



Public Comment Analysis

Date: April 27, 2011

Topic: The Proposed Co-location of New School P.S. 354 (28Q354) with P.S. 30 (28Q030) in School Building Q030

Date of Panel Vote: April 28, 2011

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to site a new zoned elementary school, P.S. 354 (28Q354, “P.S. 354”) in school building Q030 (“Q030”), located at 126-10 Bedell Street, Jamaica, NY 11434, in Community School District 28. If this proposal is approved, P.S. 354 would be co-located with P.S. 30 in school building Q030 for three school years.

In a separate Educational Impact Statement (“EIS”) that was also published on March 4, 2011, the DOE has proposed that P.S. 30 gradually phase-out because of its low performance. P.S. 30 is currently a zoned elementary school serving grades Kindergarten through 5 and offering a Pre-Kindergarten program. If that proposal is approved, P.S. 30 would no longer admit Pre-Kindergarten or Kindergarten students after the conclusion of the 2010-2011 school year and would no longer offer a Pre-Kindergarten program. Multiple grades would be phased out at P.S. 30 in the first year of phase-out (2011-2012), and one grade would be phased out in each of the following two years. During the 2011-2012 school year, P.S. 30 would only serve students in grades three, four and five. Students in grades Kindergarten through two would be served at the new P.S. 354, also located in Q030. Current fifth graders would apply to middle school via the Middle School Choice process as anticipated. In 2012-2013, P.S. 30 would serve students in grades four and five. In 2013-14, P.S. 30 would serve grade five only. The school would close after June 2014.

P.S. 354 would open in Q030 as a zoned district elementary school serving the same zone as P.S. 30. In the 2011-2012 school year, P.S. 354 would serve 55-75 students in Kindergarten, 55-75 students in first grade and 75-95 students in second grade. P.S. 354 would then grow to serve 75-95 third graders in the 2012-2013 school year and 75-95 fourth graders in the 2013-2014 school year. P.S. 354 is expected to reach full scale in 2014-15 and would serve approximately 410-430 students in Kindergarten through fifth grade. Beginning in 2011-2012 and continuing in following years, P.S. 354 would serve 18 students in a full day Pre-Kindergarten program, pending funding availability.

P.S. 354 would be “co-located” with P.S.30 as P.S. 30 phases out. 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. Once P.S. 354 has completed its expansion and P.S. 30 has completed its phase-out, P.S. 354 will be the only school in Q030.

The DOE initially published an EIS describing the proposal to co-locate P.S. 354 with P.S. 30 in Q030 on December 16, 2010, which subsequently was amended on January 26 and 28, 2011. The joint public hearing on this proposal was scheduled to be held on January 27, 2011 at P.S. 30. However, because all New York City public schools were closed on January 27 due to inclement weather, the hearing did not take place. Despite the DOE’s attempts to re-schedule the hearing within the time frame prescribed by applicable statutes and regulations, the P.S. 30 community was not able to come to an agreement on such a date.

The DOE re-filed the EIS on March 4, 2011 and held a joint public hearing on April 14, 2011.

In a separate EIS also posted on December 16, 2010, amended on January 26 and 28, 2011, and re-filed on March 4, 2011, the DOE is proposing the phase-out of P.S. 30.

The details of this proposal have been released in an Educational Impact Statement 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 P.S. 30.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at P.S. 30 on April 14, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 150 members of the public attended the hearing, 21 people spoke, and 25 questions were submitted. Present at the meeting were: Deputy Chancellor Marc Sternberg; District 28 Community Superintendent Beverly Ffolkes-Bryant; District 28 Community Education Council representative Kathryn Thome; P.S. 30 School Leadership Team representatives Regina A. Baker, Christina Fareri-Ortiz, Ellen Klinger, Tareeka Kelly, and Sandra Farrington; and Deputy Director of Public Affairs Jenny Sobelman. Council Member Ruben Wills, Assemblywoman Vivian E. Cook and a representative from Council Member Leroy Comrie’s office were also present at the hearing.

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

1. P.S. 30 PTA President Tareeka Kelly thanked members of the P.S. 30 community for their support organizing and participating at the hearing. She read aloud a letter that was sent to the Panel for Educational Policy (“PEP”), former Chancellor Cathie Black, and Gentian Falstrom from the Office of Portfolio Planning, which stated the following about the proposed co-location:
 - a. The new school, P.S. 354, should be servicing the entire school. The new school should take over the entire school.
 - b. The DOE has not explained how the new school will differentiate from the existing school.

- c. Instead of phasing out and replacing P.S. 30, fiscal resources should be redirected for a better P.S. 30.
2. P.S. 30 UFT Chapter Leader Ellen Klinger stated the following about the co-location proposal:
 - a. The proposal is a “done deal” because the DOE already introduced the leader of the proposed new school to the community.
 - b. Is a third school coming to the transportable classrooms?
3. Multiple commenters stated that it does not feel that the DOE is listening to their feedback. A commenter said the DOE should listen to the community instead of outside individuals who do not understand what is going on at the school.
4. Multiple commenters raised concern about how the phase-out and replacement plan splits the school.
 - a. A commenter inquired why the phase-out and replacement does not include all students at P.S. 30. If the school needs change, that change should be applied to all students at the school. This proposal makes it seem that the DOE has given up on students in grades 3-5.
 - b. Another commenter added that bringing in new teachers will be traumatic for current students at P.S. 30.
 - c. A commenter stated that P.S. 30 should remain having one principal and two assistant principals.
 - d. A commentator stated that a lawyer will show how this proposal fails the spirit of the Brown v. Board of Education case, by creating a separate situation that is not equal.
5. A commenter stated that she was insulted by the suggestion that a new school would bring in a new culture that is “supposed to be better.”
6. A commenter said the proposal to phase out P.S. 30 was part a larger agenda to privatize New York City schools.
7. A commenter stated that the new school would face the same challenges and the school community will be in the same situation two years from now.
8. A commenter questioned the rationale behind the proposal if the curriculum would stay the same at the new school.
9. Multiple questions were submitted about whether the new school would be a charter school or district school. A question was also submitted that inquired whether charter schools were subject to grading like district schools.
10. Multiple questions were submitted that inquired about the core curriculum, whether there would be any difference in the core curriculum, and what educational improvements would be offered at P.S. 30 and the new school.
11. A question was submitted that inquired why a principal was already named for the new school and the new school was already given a number (P.S. 354) if this was still a proposal and not final.

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

- A commentator stated that Mayor Michael Bloomberg’s third term in office and the appointment of former Chancellor Cathie Black are examples of how rules are changed “to fit the situation.”

- A commentator stated that the Mayor is using tax dollars not only to destroy the public school system, but also to profit billions by way of multi-million-dollar-no-bid contracts. The commentator cited a company that supplies cleaning supplies and is owned by the Bloomberg family.
- A commentator stated that any school system with an annual operating budget of \$21 billion and a five-year capital budget of \$11 billion should not be laying off teachers and/or overcrowding schools. Fiscal resources should be making the school system a shining example for the rest of the world and all children.
- A commentator stated that the problem is that the community has to be “engaged intellectually.” The community has to organize, chip in money, and hire lawyers to fight the DOE. The DOE only responds to money and power.
- A commentator stated that the proposal was part of a larger problem in which schools were given a Progress Report grade of “A” in 2009, which allowed the DOE to strip schools of resources for enrichment programs, teacher centers, Saturday schools. The commentator added that Eva Moskowitz could take the school if she wanted to and that she would prefer P.S. 30 over P.S. 40 because it is a nicer building.
- A commentator stated that the Mayor should get rid of the city’s consultants from Europe.
- A question was submitted that inquired why teachers were not allowed to use blackboards any more.

Summary of Issues Raised in Town Halls

On January 13, 2011, a town hall was organized and hosted by Council Member Ruben Wills, Council Member Leroy Comrie, Assemblywoman Vivian E. Cook, and State Senator Shirley Huntley. Also present at the hearing was the UFT District 28 Representative Angela Artis and the DOE Director of Public Affairs Lenny Speiller. Approximately 200 members of the public attended the town hall meeting and made comments. Although these comments were not received through the formal public comment channels, as a courtesy, the DOE wishes to acknowledge that several comments were made regarding the DOE’s proposal to phase-out and replace P.S. 30. In particular, commenters expressed disapproval of the phase-out proposal, stated that P.S. 30 had not received enough support from the DOE or warned that the school was struggling, raised concerns about school leadership and a lack of parental involvement, and wanted to know how the DOE intends to support grades 3-5 if the school phases out. Commenters also expressed their support for the P.S. 30 and suggested that the funds that would go to the new school should go to P.S. 30 instead to help the school improve. Comments similar to these issues were raised a hearing regarding the phase-out of P.S. 30 and are addressed in the public comment analysis on the phase-out proposal.

On March 29, 2011, a town hall was organized at P.S. 117 by the DOE and CEC 28. Present at the hearing were former Chancellor Cathie Black, Deputy Chancellor Marc Sternberg, Community District 28 Superintendent Beverly Ffolkes-Bryant and CEC 28 representatives Joseph Trotti, Emily Ades, Denise Nelom, Kathryn Thome, Deborah Dillingham, Lynn Schulman, Josianne Trahan, Nancy Tvedt, and Ying-Zi Yang. Approximately 200 members of the public attended the town hall and some members of the public made comments regarding the proposals to phase-out and replace P.S.30. Although these comments were not received through the formal public comment channels, as a courtesy, the DOE wishes to acknowledge that several comments were made regarding the phase-out proposal. Commenters expressed concern about phasing out schools without community

input and noted that phasing out schools divides the school community and drains resources. A commenter also asked that the DOE to redirect funding to support existing schools. Comments similar to these issues were raised a hearing regarding the phase-out of P.S. 30 and are addressed in the public comment analysis on the phase-out proposal.

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

Certain comments were also received during an initial public comment period when the proposal was first published. Although this proposal was later re-filed (thus beginning a new public comment period), the DOE would like to acknowledge that two written comments were received in regards to the co-location proposal:

12. State Senator Shirley Huntley stated her opposition of the planned rescheduling of the joint public hearing at P.S. 30 for Saturday, January 29. Ms. Huntley objected due to the short notice of the newly scheduled hearing, the fact that Saturday is a religious observance days for a segment of her constituents, and that not all CEC 28 members were consulted before rescheduling the hearing.
13. A commenter objected to the planned rescheduling of the joint public hearing at P.S. 30 for Saturday, January 29. The commenter objected due to the short notice, the fact that Saturday is a religious observance day for several members of the community, and that at least two members of the CEC did not agree to the date.

During the public comment period for the re-filed proposal, the DOE received 18 comments by e-mail, 161 comments by mail, and 4 comments by telephone. To the extent that these comments related to the co-location proposal, they are described below:

14. The DOE received 159 letters addressed to the PEP, former Chancellor Cathie Black, and Gentian Falstrom from the Office of Portfolio Planning. The letter was read aloud at the joint public hearing at P.S. 30 on April 14 and are summarized above (Comment 1, a-c).
15. The DOE received 12 online petitions that urged the DOE to rescind the proposal to phase out and replace P.S 30. The petition cited efforts by staff and parents to find ways to improve the academic performance and create a turnaround plan for the school. The petition stated that this was endorsed and supported by Council Member Ruben Wills.
16. Adrienne Adams, the Education Chair of Community Board 12, expressed her disagreement with the proposed phase out and co-location of a new school. Ms. Adams urged the PEP to consider the progress that P.S. 30 has made and continues to make after the DOE initially evaluated the school. She requested that all public schools be provided “equal resources of improvement.”
17. Ms. Kelly, the PTA President of P.S. 30, said the following (via an e-mail and two phone conversations):
 - a. It will be difficult to measure success in the new school because the new principal will not have testing grades in the beginning.
 - b. Ms. Kelly inquired how the new budget for a new school will compare to the budget given to existing schools for improvement.
 - c. Ms. Kelly inquired what the new “school culture” will be at the new school and how it will differ from the current culture. She also inquired how the DOE will measure this.

18. Multiple commenters inquired why all grades are not being considered to be part of the new school. A commenter urged change for all the students at P.S. 30.

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

Comments 1 (a), 4 (a), 14 and 18 express concern about current second, third, and fourth grade students who would remain enrolled at P.S. 30 during the phase-out plan and how they would be supported and not made to feel that the DOE has given up on them. As described in the EIS, P.S. 30 would continue offering all necessary classes to support current students as they work to meet promotional requirements, and the DOE will continue to provide support to the school as it does so. In addition, P.S. 30 will continue to receive support from a CFN team throughout the phase out process. This team will continue to provide instructional and operational support to the school administrators, teachers, and staff. Finally, as described in the EIS, current and future fourth graders may elect to participate in the application process for Louis Armstrong Middle School (28Q227), which is a 5-8 middle school accepting students as rising fifth graders.

Comments 1 (b) and 14 ask how the new school will be different from the existing school. As explained in the EIS, the DOE has proposed the phase-out of P.S. 30 and its replacement by a new school because we feel that only the most serious intervention—the gradual phase-out and eventual closure of P.S. 30—is the action the DOE must take to best serve students and the community. The DOE has proposed a school with similar structures to P.S. 30 in order to meet the P.S. 30 community’s need for a high quality zoned elementary school as well as replace the capacity provided by P.S. 30 seat-for-seat. The DOE believes that a change school staff will provide the community with a high quality option.

Comments 1 (c), 14, and 17 (b) suggest that fiscal resources would be better served by supporting P.S. 30 instead of replacing it. The DOE disagrees. New schools are funded in the same manner as our other schools. Funding follows a student and is based on student need (ELL, Special Education, below standards, 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. This amount is not large enough to even cover the salary of a first year teacher and the DOE believes it is not sufficient to support the type of change needed to turnaround P.S. 30.

Comment 2 (a) suggests that the proposal is a “done deal” because the DOE already introduced the proposed new leader of the proposed new school to the community, and Comment 11 also asks why a new school number has already been assigned to the proposed new school. The DOE did bring the proposed new leader of the replacement school to meet the community in January. This was done to get a specific sense of what the community would want to see in the replacement school, as well as to address the feedback the DOE received last year about how it issued phase-out proposals and waited for PEP approval before submitting replacement proposals. This introductory meeting was not meant to supersede any decisions. These proposals will only be implemented if approved by the PEP on April 28, 2011. Rather, both this and the development of a new school number was in effort to assure the community that the DOE is responsibly proposing and planning for a replacement school, and to share this with the community so that the overall plan to better serve the P.S. 30 community could be understood as a whole.

Comment 2 (b) asks if a third school is going to be placed in the Transportable Classroom Units (“TCUs”). The DOE has only proposed to co-locate P.S. 354 in Building Q030 as P.S. 30 phases out. The DOE has no plans to place an additional school in the building or TCUs.

Comment 3 suggests that the community’s feedback has not been taken into consideration. Indeed, the DOE welcomes feedback and has worked hard to ensure that the P.S. 30 community has had the opportunity to share concerns, ask questions, and discuss alternate proposals throughout this process. Our goal for every proposal is to engage communities well in advance of a PEP vote. In the case of P.S. 30, we talked to school leadership, parents, the SLT, CEC 28, and local community representatives about our ideas. We were very clear in these meetings that we had not settled on any proposals yet, and we were there to hear feedback and new ideas. We integrated feedback into our decisions to propose P.S. 30 for phase-out. Deciding to phase out a school is the toughest decision we make, but it is the right thing to do for the students in some schools. In this case, the DOE continues to believe that the phase-out and replacement of P.S. 30 is the best course of action for the school, but this does not mean that the DOE has not carefully considered the community’s feedback. Furthermore, the comments received on both proposals are included in this public comment analysis that will be presented to the PEP.

Comment 4 (b) suggests that bringing in new teachers will be traumatic for current students at P.S. 30. Students are assigned to new teachers on a yearly basis, and as such, students would change teachers between the 2010-2011 and 2011-2012 school years whether or not this proposal is approved.

Comments 4 (c), 15, and 16 refer to the belief that the P.S. 30 staff and parents can turn around the school. As stated above, while the DOE recognizes that P.S. 30 supporters, staff members, and parents have worked hard to improve the school, and the DOE has offered and provided support, the school has not turned around. In particular, in 2009-2010 the school earned a C on the progress sub-section of the progress report. In 2009-2010, P.S. 30 was in the bottom 15% of Citywide elementary schools in terms of learning growth in math and the bottom 7% of Citywide elementary schools in terms of learning growth in English. In 2008-09, P.S. 30 was in the bottom 2% of Citywide elementary schools in terms of the percent of students making one-year progress in math. If these low results persist, P.S. 30 students will continue falling further behind their peers in other schools. Even if this trend was to reverse and learning growth rates increased substantially, several more cohorts of students would pass through P.S. 30 before the school would see real improvement. The DOE believes that incoming students would be served much better by the replacement school than by P.S. 30 as it attempts to reverse its downward trend in student achievement and learning growth.

Comment 4 (d) suggests that phase-outs target minority communities and are unjust. The DOE determines which interventions to apply to schools based on the performance of the school (including student progress and student demographics) over time. The specific ethnic make-up of P.S. 30 was not a factor in the DOE’s decision to propose to phase out and replace P.S. 30. Rather, the DOE believes that the phase-out and replacement of P.S. 30 will best serve the school community.

Commenter 5 was insulted by the DOE's suggestion that a new school would bring in a better culture than the current one at P.S. 30. It was not the DOE's intention to offend any individuals in sharing this opinion, but rather to support the DOE's decision to propose to phase out and replace P.S. 30.

Comment 6 suggests the proposals to phase out and replace P.S. 30 are part of an attempt to privatize New York City schools, and Comment 9 asks about whether the school would be a charter school. The DOE has no intent to privatize its schools. The proposed replacement school for P.S. 30 is a zoned, district elementary school, and therefore it would not be a charter school. Comment 9 also asked whether charter schools are subject to grading like district schools, and they are.

Comment 7 suggests that the new school would face the same challenges and be in the same situation two years from now. The DOE disagrees. The only guaranteed constant between P.S. 30 and the proposed replacement school are the students. The DOE believes that the students can achieve at much higher levels, which is why the proposed new school will serve the same geographic zone of students. The DOE believes that the new school will be better equipped to support student achievement.

Comment 8 suggests that the curriculum is all that would change between the two schools, and therefore the proposals seem unnecessary. The DOE believes that much more than the curriculum will change, including but not limited to the structures in the school, the culture, and the school and community interaction and communication. As a result, the proposals to phase out and replace P.S. 30 are not unnecessary.

Comment 10 asks about the core curriculum and what educational improvements would be offered at P.S. 30 and the new school. P.S. 30 will continue to be supported by the DOE through its Children First Network, as would the new school, P.S. 354. The new school and proposed new leader will create its academic plans with an eye towards the new national standards, known as the Common Core, to best prepare its students to succeed while at P.S. 354 and beyond. These standards will be formally adopted by New York State in the next few years, when State tests will also begin to assess students according to them, rather than the current set of New York State standards. More information on the Common Core can be found at: <http://www.corestandards.org/>.

Regarding Comments 12 and 13, the Joint Public Hearing for this proposal was originally scheduled for January 27, 2011, but this was cancelled due to a snow day which closed schools on the 27th. In order to try to come to a timely conclusion of the phase-out and replacement proposals, the DOE attempted to reschedule the hearing within the legally mandated 45-day hearing window, which extended only through Sunday, January 30. While Saturday, January 29th was considered as a possibility, not all hearing participants were available on that date and so the hearing was rescheduled for a date later in the school year.

Comment 17(a) suggests it will be difficult to measure success in the new school because it will not serve testing grades in 2011-2012. The replacement school, P.S. 354, would receive an Early Childhood Progress Report after 2012-2013 when the school served grades PK-3, and then an Elementary Progress Report after the 2013-2014 school year when the school served grades PK-

4. However, P.S. 30 will be reviewed informally yearly, as are all schools. The new school will also be reviewed yearly by the District 28 superintendent. Additionally, the school would likely have a Quality Review prior to receiving a Progress Report grade. Finally, each year the school would receive results of the yearly NYC School Survey.

Comment 17(c) asks how the DOE will measure this culture of achievement. The new school will be measured along the same standards of student performance and student progress, and the more intangible effects of culture would be captured in the NYC School Survey and in the Environment sub-section in the Progress Reports.

Changes Made to the Proposal

No changes have been made to this proposal.