



Public Comment Analysis

Date: February 2, 2011

Topic: The Proposed Phase-out of M.S. 571 The Bergen Upper School

Date of Panel Vote: February 3, 2011

Summary of Proposal

M.S. 571, the Bergen Upper School (13K571, “M.S. 571”) is an existing middle school located at 80 Underhill Avenue, Brooklyn, NY 11238, in Community School District 13, in Building K009 (“K009”). It currently serves students in sixth through eighth grade. M.S. 571 is co-located with P.S. 9 Teunis G. Bergen (13K009, “P.S. 9”), an existing zoned elementary school that serves students in Kindergarten through fifth grade and also offers 3 sections of a Pre-Kindergarten program for a total of 54 seats. Co-location refers to situations where more than one school is located within a single school facility, often sharing certain common rooms such as cafeterias, auditoriums, gymnasiums, libraries, or outdoor recreation areas. The New York City Department of Education (“DOE”) is proposing to phase out and eventually close M.S. 571 based on its poor performance and the DOE’s assessment that the school lacks capacity to turn around quickly to better support student needs.

If this proposal is approved, M.S. 571 would no longer admit sixth-grade students after the conclusion of the 2010-2011 school year. One grade would then be phased out per year. During the 2011-2012 school year, M.S. 571 would serve students in grades seven and eight. In 2012-2013, M.S. 571 would serve students in eighth grade. The school would close after June 2013.

In 2009-2010, K009 had a target capacity to serve 1,192 students, and the building enrolled 751 students, yielding a target building utilization rate of 63%. In a separate Educational Impact Statement (“EIS”), published on December 20, 2010, the DOE proposed a re-siting of an existing public charter middle school, Brooklyn East Collegiate Charter School (84K780, “Brooklyn East Collegiate”), which would serve grades 5-8 when fully phased-in, from its current temporary location in a private facility located in District 17 to K009. Brooklyn East Collegiate currently serves approximately 80 students in fifth grade and will gradually grow to serve grades 5-8. If the proposal to re-site and co-locate Brooklyn East Collegiate is approved, Brooklyn East Collegiate would continue phasing in at K009 and admit fifth grade students through the charter lottery application process with a preference for District 13 students. Beginning in the 2011-2012 school year, Brooklyn East Collegiate will expand to serve approximately 80 additional students in sixth grade. When Brooklyn East Collegiate completes its expansion in 2013-2014 and achieves full scale, it will serve approximately 300-350 fifth- through eighth- grade students.

P.S. 9, M.S. 571, and Brooklyn East Collegiate would be “co-located” as M.S. 571 phases out. More detailed specifics about the use of the K009 building are described in the Brooklyn East Collegiate EIS. P.S. 9 currently enrolls 544 students in Kindergarten through fifth grade, and the enrollment is not expected to be impacted by the proposed phase-out or re-siting of Brooklyn East Collegiate. Once Brooklyn East Collegiate has completed its expansion and M.S. 571 has completed its phase-out, there will be approximately 950-1,000 students served in the building, which is below K009’s target capacity. Also, there will be sufficient space to accommodate an increase in student enrollment resulting from demand for the new school or increases in the number of families residing in District 13.

The EIS regarding this proposal was issued on December 20, 2010. An amended EIS was issued on January 20, 2011 to correct for typographical errors and formatting, delete redundant language, clarify the nature of certain of the past supports provided to M.S. 571 and reformat projected enrollment ranges to better reflect the DOE’s enrollment projections for the schools that would be served in K009. These corrections did not materially change the substance of the proposal.

The details of this proposal have been released in an Educational Impact Statement which can be accessed here: <http://schools.nyc.gov/community/planning/changes/brooklyn>. The EIS is also available in the P.S. 9, M.S. 571, and Brooklyn East Collegiate main offices.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at M.S. 571 on January 24, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 250 members of the public attended the hearing, and approximately 80 people spoke. Present at the meeting were Deputy Chancellor Laura Rodriguez; District 13 Superintendent James Machen; M.S. 571 Principal Santosha Troutman; P.S. 9 Principal Sandra D’Avilar; Brooklyn East Collegiate Principal Eric Green; P.S. 9 School Leadership Team representative Karen Shaw-Taylor; M.S. 571 Parent Teacher Association President Maria Salichs; Community Education Council (CEC) 13 representative Khem Irby; CEC 13 representative Renee Holmes; United Federation of Teachers Vice President Richard Farkas; Democratic District Leader for the 52nd Assembly District Chris Owens; and Democratic District Leader for the 52nd Assembly District JoAnne Simon.

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

1. CEC representative Khem Irby voiced support for all District 13 schools. She further encouraged P.S. 9 and M.S. 571 communities to work together. She commented that other arrangements or siting options should be considered for Brooklyn East Collegiate given space constraints.
2. M.S. 571 PTA President Maria Salichs commented that most of the students who attend M.S. 571 are not from District 13 and that M.S. 571 was the only school to accept her son. She questioned what would happen to the students who are not selected by lottery to attend Brooklyn East Collegiate and asked whether the M.S. 571 community wanted a public school in the building that admits students through a lottery.

3. The Vice President of the United Federation of Teachers (“UFT”) spoke on behalf of the UFT in support of P.S. 9. The representative stated that M.S. 571 is being phased out to create space for charter schools. He then commented that the DOE has not provided M.S. 571 with enough support.
4. A State Committee member for the New York State Democratic Party spoke of his positive experiences as a student at P.S. 9 and expressed opposition for the proposal to relocate Brooklyn East Collegiate in building K009. The commenter also stated that Brooklyn East Collegiate would likely serve less special needs and English Language Learner (“ELL”) students than M.S. 571 did.
5. A commenter spoke about the divisions in the community, especially in the P.S. 9 community because of this proposal and noted that those divisions should be repaired.
6. Multiple commenters, including representatives from the offices of N.Y. State Assembly members Joan Millman, Inez Barron, and Hakeem Jeffries, New York City Council member Letitia James, the President of the District 13 President’s Council Timothy Greedy, and multiple students, voiced opposition to the proposed phase-out of M.S. 571 for the following reasons:
 - a. The DOE did not adequately support M.S. 571 and P.S. 9 in the past;
 - b. P.S. 9 had improved in the past, and asked that M.S. 571 be given more time to turn around;
 - c. There was low morale in the school and high teacher turnover as a result of the phase-out;
 - d. M.S. 571 school has well-trained teachers who are committed to putting in extra time to assist students, as well as a positive environment and good guidance counselors;
 - e. The phase out proposal was rushed and did not adequately incorporate feedback from the community.
7. Multiple commenters voiced their support for P.S. 9 by citing the caring and positive atmosphere at the school.
8. A commenter expressed concern that addressing two proposals at one hearing divided the community.
9. Multiple commenters expressed support for allowing P.S. 9 to continue to grow and opposed the plan to phase out M.S. 571.
10. A commenter noted that the community should be more involved in decisions about underperforming schools like M.S. 571.
11. One commenter asked the DOE to reconsider the proposal to phase out M.S. 571.
12. A student commented that he was opposed to the proposal to phase out M.S. 571 because the school had good existing programs, like the Boys to Men program.
13. Multiple commenters expressed opposition to phasing out M.S. 571 based on one year of failing grades on one Progress Report.
14. A commenter asked for more time to turn the school around and voiced her opposition to the DOE’s plan and Mayor Bloomberg’s policies.
15. A commenter stated that she opposed the phase-out of M.S. 571 because the school had never received two consecutive Ds or Fs on its progress report. Therefore, the commenter said it would be unreasonable to move forward with a phase-out.

16. A commenter referred to “11th hour changes,” with the EIS and commented that the DOE had not considered the proposal to phase out M.S. 571 thoughtfully. She also questioned the accuracy of the EIS for the proposed phase-out of M.S. 571.
17. A commenter asked whether the building would have a new library and librarian, stating that the phase out proposal overshadowed other considerations with building K009.
18. A commenter encouraged the DOE to introduce more after school sports teams and extracurricular programs in Building K009.
19. A commenter asked whether the proposal to phase-out M.S. 571 would be considered separately from the proposal to co-locate Brooklyn East Collegiate.
20. A commenter said M.S. 571 should be given an opportunity to turn around, as afforded to it by the Chancellor’s Regulations.

The DOE received the following comments at the Joint Public Hearing which did not directly relate to the proposal and therefore do not require a response

- A commenter voiced his dissatisfaction with Mayor Bloomberg’s policies and called for an investigation into the Mayor’s personal finances. He also commented that the voting age should be lowered from 18 years to 16 years.

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

21. New York State Assembly member Hakeem Jeffries wrote that the decision to phase-out and replace M.S. 571 is premature and is based on improperly analyzed raw data. The school has not been given enough time to show it can improve, although signs of some improvement are already visible. The school should be given more support instead. The proposal to phase out the school seems to be based on a pre-determined decision to place a charter school in the building.
22. Approximately 35 commenters expressed opposition to the proposal for the following reasons:
 - a. M.S. 571 received a “B” in the 2008-2009 Progress Report, and the school’s lowest grade occurred on its 2009-2010 Progress Report which is not sufficient enough to warrant the phase out of the school. Instead of closing M.S. 571, the DOE should provide more support to the school.
 - b. M.S. 571 is considered to be “In Good Standing” with the New York State Education Department.
 - c. The DOE’s own quality review yielded positive comments about M.S. 571, indicating the school has great potential.
 - d. M.S. 571 is victim to factors outside of its control, like attendance issues, which the school has nonetheless attempted to remedy. Also, the school should be given time to experience the effects of the Mayor’s Truancy Program, which was launched in September 2010.
 - e. Opening new schools and closing old ones does not change or fix anything because the DOE does not nurture existing school.
23. New York City Council Member Letitia James wrote that the proposal ignores the desperate need for support at M.S. 571, and the school’s scores are so low because they accept students who are already far below grade level. She said a two-year moratorium on the proposal should be issued to evaluate the growth of M.S. 571.

24. The DOE received a comment concerning all phase-out proposals calling for a moratorium on school closings, which stated that the DOE is the servant of the people and is not acknowledging the community's opposition to these proposals. The commenter suggested a facilitated discussion process which would work towards consensus.

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

- Comments 1, 3, 5, and 7, relate to the potential impact of this proposal on P.S. 9. As discussed in the EIS, the proposed phase out of M.S. 571 is not expected to impact current or future student enrollment or instructional programming at P.S. 9. Once M.S. 571 is phased out and the new charter school is phased in, the building would serve 969-1,029 students for a target utilization rate of 86%. Therefore, there is sufficient capacity to accommodate both schools at full scale. In addition, as noted in the EIS, in the future, if there is an increase in student enrollment or demand at P.S. 9, the DOE reserves the right to relocate Brooklyn East Collegiate to an alternate location to accommodate the increased demand/enrollment at P.S. 9. At this time, however, based on the current projections and demand for P.S. 9 there will be enough space to accommodate both schools in the building. The leadership at P.S. 9 may submit an application to expand the grades offered at the school in the future. If P.S. 9's principal, SLT, and parents believe that P.S. 9 would benefit from expanding to serve students in sixth through eighth grades, the DOE encourages the P.S. 9 principal to contact the school's Network Leader to discuss such changes that could be implemented at the school. Principals had been notified about the previous deadline to apply for grade expansion. To date, the DOE has not received any applications from P.S. 9 to expand the grades served.
- Comment 2 relates to the options for future middle school students in District 13. Although the commenter stated the most of the students who attend M.S. 571 are not from the district, in fact, according to the audited register dated November 1, 2010, approximately 70% of students enrolled in M.S. 571 reside in District 13. As detailed in the EIS, students in the district would continue to have access to a broad range of middle school options through the District 13 Middle School Choice process. These choices are outlined in the EIS for this proposal. In general, excluding the seats currently available at M.S. 571, there are 1,529 sixth-grade seats in District 13. In 2010-2011, there were only 1,211 sixth-grade students enrolled in District 13 schools, including those at M.S. 571. This means that there is sufficient additional space in existing District 13 schools in the middle school entry grade to replace the seats lost by this proposal.

In addition to the seats available at existing District 13 middle schools, students may apply through the charter lottery application process to attend Community Partnership Charter School, Community Partnership Charter School, Leadership Preparatory Bedford-Stuyvesant Charter School, and Achievement First Endeavor Charter School. If the proposal to site Brooklyn East Collegiate in the building is approved, students may

also apply to attend this charter school, preference would be given to students who reside in District 13.

- Comments 3, 6(a), and 20 stated that M.S. 571 was not supported adequately. Contrary to that suggestion, the DOE has offered considerable support to M.S. 571 which included:

Leadership Support:

- Offering leadership mentoring, training, and coaching for the principal on recruiting and retaining talented staff, setting school wide goals, and developing systems to help implement best teaching practices.
- Working with the principal to develop a detailed plan that aligned with M.S. 571's Quality Review, outlined its strengths and areas for improvement, established a timeline, and assigned action items to individuals.
- Connecting administrators with other schools to learn effective practices that could be replicated at M.S. 571.

Instructional Support:

- Supporting the principal in creating individual teacher goals, developing a plan-of-action for each teacher, and creating individualized training plans.
- Helping the principal analyze data to find patterns and trends in the performance of various sub-groups of students, particularly English Language Learners and students with disabilities.
- Working with the principal, assistant principal, literacy and math coaches, and a data specialist to develop a data system to project and monitor student progress.
- Offering professional development to teachers in curriculum planning, student engagement, project-based learning, and designing assessments.
- Working with the school to establish teacher teams that focus on the needs of English Language Learners, students with disabilities, and students performing below grade level.
- Arranging for on-site content experts to coach teachers in English, math, social studies and science.
- Working with M.S. 571 to ensure students with disabilities and English Language Learners receive proper services.

Operational Support:

- One-on-one support for the principal and staff on topics including budgeting, human resources, recruiting and retaining talented teachers, building management, and operational compliance issues.

Student Support:

- Helping M.S. 571 secure partnerships with Brooklyn Community Services, which provides after-school and academic enrichment programs, and Urban Advantage, which exposes students to science through cultural institutions.

Safety Support: The DOE makes available the following supports to schools around safety and security:

- Providing Best Practices Standards for Creating and Sustaining a Safe and Supportive School as a resource guide.
 - Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and NYPD).
 - Providing technical assistance when incidents occur via the Borough Safety Directors.
 - Providing professional development and support to CFN Safety Liaisons.
 - Providing professional development and kits for Building Response Teams.
 - Monitoring and certifying School Safety Plans annually.
- Comment 4 suggests that Brooklyn East Collegiate would be less likely than M.S. 571 to serve students with special needs and ELL students. Brooklyn East Collegiate will serve all students, regardless of whether they are an ELL student or a student with special needs. Charter schools are expected to serve student populations that reflect the district in which they are located.
- Comment 6(c) stated that the proposed phase-out could result in low school morale and high teacher turnover. If this proposal is approved, the DOE would continue to provide support to current sixth, seventh, and eighth grade students as they progress towards completion of middle school and transition to high school. In addition, M.S. 571's Network Leader would continue to provide support to the school's faculty and staff throughout the phase-out. All teachers, administrators and non-pedagogical staff at M.S. 571 would be excessed over the course of the phase-out. 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.
- Comments 6(d) and 12 expressed the fact that M.S 571 has well-trained teachers and good programs, such as the Boys to Men program and the CHAMPS program. We recognize that M.S. 571 staff members have worked hard to improve the school. Despite their efforts, the school has not developed the proper infrastructure to meet the needs of its students and families. We also recognize that M.S. 571 has instructional programs and extracurricular activities that students enjoy. These programs and activities would continue to be offered as the school phased out. In addition, there are other middle schools in the district that offer comparable programs as demonstrated in the EIS for this proposal. For example, the CHAMPS program is also available at M.S. 226, J.H.S. 383, and Khalil Gibran International Academy, which are all options in the District 13 Middle School Choice Process. Mentoring programs similar to the Boys to Men program are available at M.S. 226 and Eagle Academy for Young Men II, which are options in the District 13 Middle School Choice Process.
- Comments 6(b), 11, 13, 14, 15, 20, 21, 22(a-d), and 23 note that M.S. 571 should be given more time to improve its performance. Although the decision to close a school is a difficult decision to make, the DOE believes that this measure is necessary because:
 - M.S. 571 earned a D grade on its 2009-2010 Progress Report, including F grades in the Student Performance, Student Progress, and School Environment sub-sections.

- Although M.S. 571 earned an overall B grade on its 2008-2009 and 2007-2008 Progress Reports, the school also earned D grades in the School Environment subsection on both of those Progress Reports.
 - In 2008-2009, only 32% of M.S. 571 students were performing on grade level in English Language Arts, which placed the school in the bottom 2% in middle school ELA proficiency Citywide, and 55% of M.S. 571 students were performing on grade level in math, putting M.S. 571 in the bottom 10% in middle school math proficiency Citywide.
 - In 2007-08, only 31% of students were on grade level in ELA, putting the school in the bottom 20% in ELA proficiency Citywide, and only 49% of M.S. 571 students performed on grade level in math, placing the school in the bottom 23% for math proficiency Citywide.
 - Student attendance actually declined from 87.7% to 83.4% between 2008-2009 and 2009-2010. While the DOE is hopeful that the Mayor's anti-truancy initiative will be successful in M.S. 571 and other schools, the DOE also believes that it is apparent that M.S. 571 has failed to develop the proper infrastructure to meet the needs of its students and families.
 - While M.S. 571 was rated "Proficient" on its most recent Quality Review in 2008-2009, the review a number of serious concerns. Specifically, the reviewer indicated that the school did not consistently use data to create effective lessons and differentiated strategies, which resulted in inadequate differentiation of teaching to meet each student's needs. The report further indicated that the school needed to make timely adjustments to curriculum and instruction to increase student performance and implement broader outreach to community organizations, foundations, and partnerships that could support the school environment and students' academic, social, and emotional growth.
 - Finally, even though M.S. 571 was determined to be "In Good Standing," by the New York State Education Department, the academic performance trends indicate above illustrate that M.S. 571 students will only fall further behind their peers in other schools if the school is not closed, and, therefore, only the most serious intervention, the gradual phase-out and eventual closure of M.S. 571, will address the school's longstanding struggles and allow for new school options to develop in the K009 building that will better serve future students and the broader community.
- Comments 6(e), 10, and 19 relate to the engagement process. Comment 8 stated that addressing both the proposal to phase-out M.S. 571 and the proposal to co-locate Brooklyn East Collegiate in building K009 was divisive. Prior to posting an EIS regarding this proposal to phase out M.S. 571, the Superintendents facilitated meetings with the M.S. 571 community including the School Leadership Team, parents, and teachers to explain the Department's rationale on why M.S. 571 may be phased out. They also reviewed with the community the supports that had been provided in the past. A hearing regarding this proposal was held, and a dedicated email as well as a voicemail for this proposal was set up. These measures effectively allowed the community to have a voice in the process and in the decision to phase out M.S. 571. In accordance with Chancellor's Regulation A-190, this proposal was posted at least 6 months in advance of when the closure would take place, and a joint public hearing was held within the

mandated time frame as well.

The joint public hearing for both the proposal to phase out M.S. 571 and to co-locate Brooklyn East Collegiate were held at the same time because both proposals are part of the overall plan for building K009. Although the joint public hearing for the phase out proposal and the proposal to co-locate Brooklyn East Collegiate were held at the same time, the proposal to phase out M.S. 571 and the proposal to re-site and co-locate Brooklyn East Collegiate in building K009 will be considered separately by the PEP. The PEP will vote on various proposals, including these two proposals, on February 3, 2011, and there will a period designated for public comment at that hearing when the vote is scheduled.

- Comment 9 suggests that P.S. 9 should be allowed to expand, whether by increasing the number of sections per grade or by expanding to serve students in sixth through eighth grades. The proposed co-location of Brooklyn East Collegiate is not expected to impact current or future student enrollment or instructional programming at P.S. 9. As stated earlier if there is an increase in P.S. 9’s enrollment resulting from an increase in demand for the zoned elementary school or an increase in the number of families residing in the zoned area, the Chancellor reserves the right to relocate Brooklyn East Collegiate to an alternate location geographically proximate to K009.

The following data indicates that P.S. 9 is able to accommodate additional zoned families without having to open additional classes. Currently, only 55% of the students enrolled at P.S. 9 (not including students enrolled in the pre-kindergarten program, the gifted and talented program, or students who receive full-time self contained or collaborative team teaching services) reside in the zone of P.S. 9:

2010-2011 Audited Register Data	K	Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Grades K-5
Number of students residing in the P.S. 9 Zone	53	44	26	21	22	19	185
Number of students not residing in the P.S. 9 Zone	30	29	29	21	23	17	149
Grand Total	83	73	55	42	45	36	334

2010-2011 Audited Register Data	K	Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Grades K-5
Percentage of students residing in the P.S. 9 Zone	64%	60%	47%	50%	49%	53%	55%
Percentage of students not residing in the P.S. 9 Zone	36%	40%	53%	50%	51%	47%	45%

The DOE acknowledges that this may mean that families residing outside of the zone may no longer be able to register their children at P.S. 9. This would not affect families seeking to enroll their children into the pre-kindergarten program or the gifted and talented program.

Further, the DOE recognizes that some parents and students prefer the continuity of education that K-8 schools could provide. If P.S. 9's principal, SLT, and parents believe that P.S. 9 would benefit from expanding to serve students in sixth through eighth grades, the DOE encourages the P.S. 9 principal to contact the school's Network Leader to discuss such a change that could be implemented at the school. Principals had been notified about the previous deadline to apply for grade expansion. At this time, the DOE is unaware that any formal proposal to expand the grades served at P.S. 9 was made.

- Comment 16 relates to the DOE's decision to amend the initial EIS regarding this proposal and publish the amended EIS on January 21, 2011. The amended EIS did not materially or substantially change the initial proposal for this co-location. The amended EIS merely corrected typographical errors and formatting, deleted redundant language, and reformatted projected enrollment ranges to better reflect the DOE's enrollment projections for the schools that would be served in K009.
- Comment 17 inquired whether building K009 would have a new library and librarian. Most funding in school budgets is allocated on a per-pupil basis according to Fair Student Funding (FSF) per capita allocation levels, which are subject to annual variation. At the school's discretion, these funds may be used to hire staff, including librarians, purchase supplies and materials, or implement instructional programs. Building K009 currently utilizes two classrooms as a shared library.
- Comment 18 noted that there should be more extracurricular programs in building K009. School administrators determine which extracurricular programs are offered at their respective schools based on student interests and available resources. All schools modify extracurricular offerings annually based on student demand and available resources.
- Comment 22(e) noted that phasing out schools was not the proper method to improve schools. In New York City, we are striving to create a system of great schools. To accomplish this goal, we've replaced 91 of our lowest-performing schools with better options and opened 474 new schools. Of the 474, 365 are traditional public schools and 109 are public charter schools. As a result, we've created more good choices for families. M.S. 571 will continue to serve students as it phases out so all current middle school aged students in grades 6-7 would be able to complete elementary school at M.S. 571 and all eighth grade students will participate in the Citywide High School Admissions Process, assuming they continue to meet promotional standards.
- With respect to comment 24, the central goal of the Children First reforms is to create a system of great schools. Every child in New York City deserves the best possible education. This starts with a great school – led by a dedicated leader with a vision for student success. To ensure that as many students as possible have access to the best possible education, since 2003 New York City has replaced 91 of our lowest-performing schools with better options and opened 474 new schools: 365 district schools and 109 public charter schools. As a result, we've created more high-quality choices for families.

Based on feedback from communities in 2009 and 2010, the DOE made improvements to its timeline and process for communicating with schools and families early and often throughout the investigation and decision making process. This year, we talked to school leadership, parents, SLTs, CECs, elected officials, and local CBOs about our ideas about how to improve struggling schools. We convened these meetings to discuss our proposals and to hear feedback and new ideas.

The Department developed and distributed “Fact Sheets” for each school we talked with. These fact sheets described proposals, the rationale behind them, included relevant data, and provided clear instructions for how to offer feedback. They were posted on our website and distributed at meetings.

When we announced the Department’s recommendation to propose the school for phase out, dedicated teams of educators and engagement specialists spent several days back in these schools meeting with teachers, parents, and students.

In January, Joint Public Hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The Department’s analysis of public comment is contained in this document.

Changes Made to the Proposal

No changes have been made to this proposal as a result of public comment.