

Public Comment Analysis

Date: April 19, 2016

Topic: The Proposed Opening and Co-Location of a New Site of an Existing District 75 School P.S. K753 (75K753) with High School for Innovation in Advertising and Media (18K617), High School for Medical Professions (18K633), Urban Action Academy (18K642), and School for Cooperative Technical Education (79M645) in Building K500 Beginning in 2016-2017

Date of Panel Vote: April 20, 2016

Summary of Proposal

On March 3, 2016, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to open and co-locate a new site of P.S. K753 (75K753), an existing District 75 school, in building K500 (“K500”), to be called “P753K@H500,” beginning in the 2016-2017 school year. 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. K500 is located at 1600 Rockaway Parkway, Brooklyn, NY 11236, in Community School District 18 (“District 18”). If this proposal is approved, P753K@H500 will be co-located with High School for Innovation in Advertising and Media (18K617, “High School for Innovation”), a district high school serving students in ninth through twelfth grades, High School for Medical Professions (18K633, “Medical Professions”), a district high school serving students in ninth through twelfth grades, Urban Action Academy (18K642, “UAA”), a district high school serving students in ninth through twelfth grades, and School for Cooperative Technical Education (79M645, “Co-op Tech”), a multi-sited District 79 program at K500 serving students ages 17 to 21. K500 also houses the Community-Based Organization (“CBO”) City Year.

Based on a projected increased need for District 75 seats across the borough, the District 75 Placement Office is seeking to increase its capacity to serve students who have been classified as having autism, intellectual disabilities and/or multiple disabilities who reside in Brooklyn. Since the 2012-2013 school year, District 75 enrollment has grown by over 1,300 students citywide. If this proposal is approved, the DOE will open a new site of an existing District 75 school, P753K@H500, beginning in the 2016-2017 school year. P753K@H500 will serve students across ninth through twelfth grades, who are classified as autistic, intellectually disabled or multiply disabled under an Individualized Education Program (“IEP”). P753K@H500 is projected to serve eight sections of students in self-contained sections in 8:1:1 or 6:1:1 classroom settings (ratio of students: teacher: paraprofessional). Students are placed in District 75 programs based on their individual needs and recommended special education services.

If approved, this proposal will add approximately 48-64 self-contained seats in K500 for District 75 high school students who are classified as autistic, intellectually disabled or multiply disabled on their IEPs. These additional seats are necessary to meet the increased demand for District 75 self-contained programming in Brooklyn.

The details of this proposal have been released in the EIS, which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/April202016SchoolProposals>. Copies of the EIS are also available in the main offices of High School for Innovation, Medical Professions, UAA, and Co-op Tech.

Summary of Comments Received at the Joint Public Hearings

A Joint Public Hearing for this proposal was held on April 5, 2016 in building K500. At that meeting interested parties had an opportunity to provide input on the proposal. Approximately 20 members of the public attended the hearing and 10 of them spoke. Individuals present at the meeting included: District 75 Deputy Superintendent,

Barbara Joseph; Citywide High Schools and Transfer High Schools Superintendent, Paul Rotondo; District 79 Superintendent, Nancy Velez; Community Education Council 18 (“CEC 18”) President, James Dandridge; Citywide Council for District 75 (“CCD75”) President, Celia Green; UAA Principal, Steve Dorcelly; UAA School Leadership Team (“SLT”) representative, Jennifer Wellington; Medical Professions Principal, Pauline O’Brien; Co-op Tech Principal, Corey Prober; High School for Innovation SLT representative, Stanley Alton; and David Harrington and Greg Whitten from the DOE.

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

1. CCD75 President, Celia Green, commented as follows:
 - a. Few District 75 options currently exist in District 18, and she is excited for this program to offer families within District 18 opportunity to attend a high school closer to home.
 - b. This District 75 program is designed for students in 6:1:1 or 8:1:1 settings, which are typically not for students with physical disabilities. Thus, the concerns raised about a lack of fully accessible bathrooms in K500 should not impact this proposal.
2. Medical Professions Principal, Pauline O’Brien, commented as follows:
 - a. She is a former special education teacher and is in support of special education programs.
 - b. She is concerned for the District 75 program in K500, as there are no handicapped-accessible bathrooms in the building.
 - c. She is also concerned about the space plan for the proposal, as she disagrees with the planned approach of having the District 75 program stacked on multiple floors instead of occupying contiguous space on one floor.
3. Co-op Tech Principal, Corey Prober, commented that Co-op Tech is planning to offer additional CTE programming in K500, and he is excited about the opportunity to expand course offerings at this site and to work with the District 75 program if this proposal is approved.
4. UAA Principal, Steve Dorcelly, commented as follows:
 - a. He requests that K500 be provided 3-4 additional school safety agents, and 1 additional scanning machine, to help address the additional students that will be added to K500.
 - b. He asks that the DOE work to ensure that all schools have the opportunity to partner with and collaborate with the District 75 program in the building.
5. High School for Innovation SLT representative, Stanley Alton, commented as follows:
 - a. He is excited for a new program to enter building K500.
 - b. His only concern is the lack of handicapped accessibility for bathrooms in K500.
6. CEC 18 President, James Dandridge, commented as follows:
 - a. He encourages school communities in K500 to make their voices heard with regards to how space is planned in their building.
 - b. If parents are happy with this program in this building, he welcomes parent choice in this process.
7. District 75 Deputy Superintendent, Barbara Joseph, commented as follows:
 - a. She is excited to expand P753K@H500 to this site, and she is excited for the schools in the building to collaborate with one another.
 - b. She clarified that this would not be a new program, but rather an expansion of an additional program.
 - c. She stated that that this program will serve students in 6:1:1 and 8:1:1 classes, which typically involve students with developmental disabilities and are not designed for students with physical disabilities.
 - d. She noted that it is important to have a District 75 high school program in District 18 to offer students in District 18 the opportunity to attend school close to home.
8. One commenter expressed support for the proposal in meeting the needs of the District 75 community.
9. One commenter noted that building K500 does not have handicapped-accessible bathrooms.
10. One commenter questioned whether additional school safety agents will be added to K500 if this proposal is approved.
11. One commenter expressed concern about the plan to stack P753K@H500 on multiple floors in the building, rather than on one floor in contiguous space.

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

The DOE received zero (0) voicemails through the dedicated phone number for this proposal.

The DOE received zero (0) emails through the dedicated email address for this proposal.

Analysis of Issues Raised, Significant Alternatives, Significant Alternatives Proposed

Comments 1(a), 3, 5(a), 7(a), 7(d), and 8 express support for the proposal, whereas comment 2(a) expresses support for special education programs; thus, these comments do not require a response.

Comments 2(b), 5(b), and 9 express concerns about the proposal because there are no handicapped-accessible bathrooms in K500, whereas comments 1(b) and 7(c) note that this District 75 site is being planned for students in 6:1:1 or 8:1:1 classes, which typically are not the setting of students with physical disabilities.

The DOE recognizes the concerns raised in comments 2(b), 5(b), and 9 regarding a lack of handicapped-accessible bathrooms in K500. As noted in comments 1(b) and 7(c), the District 75 program planned for K500 is planned for students in 6:1:1 and 8:1:1 self-contained special education classes, which typically serve students with intellectual and developmental disabilities, and students with autism. The lack of handicapped-accessible bathrooms in K500 will not preclude the opportunity for these programs to be offered in the building, though the DOE is also working to improve handicapped-accessibility in all building campuses around New York City. To the extent that any particular student cannot access the bathroom facilities in K500, the DOE would need to consider whether K500 offers an appropriate educational environment for that child.

Comments 2(c) and 11 express concern that the District 75 program in K500 will be located stacked on multiple floors, rather than contiguous space on one floor.

The DOE notes that specific space plans for this new co-location, if approved by the PEP, have not yet been finalized. If in fact this proposal is approved, the Office of Space Planning and the Office of Campus Governance will meet with all of the principals on the K500 campus in a Space Implementation Meeting to determine the appropriate placement of the District 75 program in consideration for the needs of that program and where current schools in K500 are presently located. While a program contained in contiguous space rather than stacked on multiple floors may pose certain benefits, the DOE also plans with a goal of minimizing disruption and planning for the schools already located in the building. Thus, as the Space Implementation meeting occurs, the DOE will work with the schools already on the K500 campus and P753K@H500 to determine the appropriate placement for the new program in light of the needs of all programs in the building and with a goal of minimizing disruption of the current location of each school already on the campus.

Comments 4(a) and 10 question whether additional security agents will be provided to the K500 campus, and if so, how many agents will be added as a result of this proposal.

The DOE recognizes concerns related to school safety in K500, and takes these concerns seriously. The Office of School and Youth Development (“OSYD”) supports schools in maintaining a safe, orderly, and supportive school environment. The DOE encourages all schools, including those in K500, to seek support from OSYD to address any issues involving safety and security. School Safety Agents (“SSAs”) are allocated to schools based on each building’s projected enrollment. The NYPD’s School Safety Division looks at a set of variables to determine the number of SSAs to deploy to a particular school building, including the crime rate, size and design of the building, enrollment, and grade span. Thus, the proposal to open and co-locate P753K@H500 into K500 will not necessarily result in additional school safety agents being added to the building, but a combination of factors related to the proposal may result in additional SSAs being employed to the K500 campus.

Further, 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 the New York City Police Department);

- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

Comment 4(b) requests that the DOE work to ensure that all schools in the building have the opportunity to partner with and collaborate with the District 75 program in the building.

The DOE aims to build the capacity of school communities to support interschool collaboration, leadership development, and resource sharing. The DOE has programs that foster environments where innovation and critical thinking can thrive, enabling schools to better prepare students to be college and career-ready. More information can be found online at: <http://schools.nyc.gov/Academics/InterschoolCollaboration/default.htm>.

Further, in any building where more than one school is co-located, the Building Council, which consists of the principals of each school, meets regularly to address issues related to space allocations, shared space usage, and building planning. Principals of co-located schools are encouraged to collaborate and can use the Building Council as a forum for doing so. The DOE also offers schools in any co-location a Co-Location Handbook, which provides many best practice examples for effective and efficient management of a school campus. More information about the Co-Location Handbook and the Building Council can be found online at: <http://schools.nyc.gov/community/campusgov/default.htm>.

Comments 6(a) and 6(b) encourage family choice and encourage school communities in K500 to be active in conversations involving planning in the building.

The DOE appreciates the sentiments from CEC 18 that encourage family choice and active involvement in school planning discussions, and the DOE similarly encourages families and school communities to be involved in planning conversations for their school building. The DOE seeks to support co-located schools through a variety of methods, including providing resources of best practices in co-locations in the Co-Location Handbook and encouraging regular meetings of the Building Council, a campus structure consisting of the principal of each school, which meets regularly to address issues related to co-location and shared space usage. Through the Building Council and strategies addressed in the Co-Location Handbook, the DOE hopes to encourage school communities to be involved and active in the decisions being made about their campus. More information on the use of Building Councils and the Co-Location Handbook can be found here: <http://schools.nyc.gov/community/campusgov/default.htm>.

Comment 7(b) clarifies that P753K@H500 is not a new program, but rather is a new site for an already existing program. This comment is self-explanatory in nature and does not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.