

Public Comment Analysis

Date: April 19, 2016

Topic: The Proposed Opening and Co-Location of a New Site of Existing District 75 School, P.S. K036 (75K036), with P.S. 224 Hale A. Woodruff (19K224) in Building K224 Beginning in the 2016-2017 School Year

Date of Panel Vote: April 20, 2016

Summary of Proposal

On March 3, 2016, the New York City Department of Education (“DOE”) issued a proposal to open and co-locate a new site of P.S. K036 (75K036), an existing District 75 school, to be called “P036K@K224,” in building K224 (“K224”) beginning in the 2016-2017 school year. K224 is located at 757 Wortman Avenue, Brooklyn, NY 11208 in Community School District 19 (“District 19”). If this proposal is approved, P036K@K224 will be co-located with P.S. 224 Hale A. Woodruff (19K224, “P.S. 224”), an existing district elementary school currently serving students in kindergarten through fifth grade and offering a full-day pre-kindergarten (“Pre-K”) program. K224 also currently houses an Adult and Continuing Education Center. A “co-location” means that two or more school organizations are located in the same building and may share common spaces, such as the auditorium, library, gymnasium and cafeteria.

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 P036K@K224, a new site of an existing District 75 school, P.S. K036, beginning in the 2016-2017 school year. P036K@K224 will serve a range of students across kindergarten through fifth grade who are classified as autistic, intellectually disabled or multiply disabled under an Individualized Education Program (“IEP”). P036K@K224 is projected to serve ten sections of students in self-contained sections in 12:1:1, 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, and are referred to District 75 during a period that extends into summer. Students may be served in this program throughout the course of their education.

If approved, this proposal will add approximately 60-80 District 75 self-contained seats in K224 for District 75 elementary 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.

K224 has the capacity to serve 735 students. During the current (2015-2016) school year, K224 is serving 502 students, yielding an estimated building utilization rate of 68%. This means that the building is “under-utilized” and has space that could be used more efficiently to accommodate additional students. If this proposal is approved, P036K@K224 will open in September 2016 and serve ten self-contained sections of elementary school students, for a total of approximately 60-80 students. In the 2016-2017 school year, P.S. 224 is projected to serve approximately 451-511 students. Therefore, it is projected that in the 2016-2017 school year there will be approximately 511-591 students served in K224, yielding an estimated building utilization rate of 70%-80%. If this proposal is approved, there will be sufficient space in K224 to accommodate P036K@K224 and P.S. 224.

The details of this proposal have been released in an Educational Impact Statement (“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 office of P.S. 224.

Summary of Comments Received at the Joint Public Hearing

The DOE held a Joint Public Hearing regarding this proposal at K224 on April 12, 2016. At that hearing, interested parties had an opportunity to provide input on this proposal.

Approximately 15 members of the public attended the hearing. There were 8 speakers. Individuals present at the hearing included: District 19 Superintendent Joyce Stallings-Harte; District 75 Superintendent Ketler Louissaint; Community Education Council 19 (“CEC 19”) President Joyce French; CEC 19 Vice President Evelyn Pugh; Community Education Council 75 (“CEC 75”) Vice President Celia Green; P.S. 224 Principal George Andrews; P.S. 224 School Leadership Team (“SLT”) member Jane Lofton; and Jamie Dollinger and Greg Whitten from the DOE.

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

1. Joyce French, President of CEC 19, expressed the following:
 - a. Why is K224 considered for this proposal?
 - b. She knows K224 has space and is barrier free but thinks safety will be a concern.
 - c. Traffic jams will be a concern.
2. Celia Green, Vice President of CEC 75, expressed the following:
 - a. She is happy about this proposal.
 - b. She supports the proposal because a lot of District 19 students who are in need of District 75 placement are bussed out of the district, which can be dangerous.
 - c. The District 75 students are part of the community, and they deserve to be served in the district. This proposal will assist with serving those students in the district.
3. Jane Lofton, P.S. 224 SLT Member, expressed the following:
 - a. She has concerns about the safety of the school community.
 - b. District 75 students may have the propensity to run out of the school building, which will jeopardize everyone’s safety and peace of mind.
 - c. How can we ensure this is simply a co-location and not a long term plan to phase out P.S. 224?
 - d. This will impact our New York State school accountability status.
 - e. We may have the space, but how is it the appropriate type of space?
 - f. This will impact the students’ ability to move safely through the building.
 - g. Why is the proposal impacting P.S. 224, if there are other schools that are barrier free?
 - h. Two security guards will not be able to serve an increasing school population.
 - i. Traffic congestion around the school could cause incidents and an unsafe situation.
 - j. More parking permits will be needed because of the increase in staff members.
4. George Andrews, P.S. 224’s principal, stated that this will be a change for his community and asked that the community’s voices are heard.
5. A P.S. 224 SLT member expressed the following:
 - a. Her main concern is safety of the students.
 - b. Where will the District 75 classrooms be placed?
6. A P.S. 224 SLT member expressed the following:
 - a. Her main concern is that there are only two security guards assigned to the building.
 - b. What floor will the District 75 students occupy?
 - c. How many rooms in total will the District 75 students occupy?
 - d. How will students be separated, so that teachers know which children are in which school and there will not be safety concerns for those children?
 - e. How will schools share one nurse in the building?
 - f. How will this work with the traffic from busses?
 - g. Will there be two separate entrances and exits for the two schools?
7. One member of the community expressed the following:
 - a. She has grandchildren in this school.
 - b. What is this proposal trying to do? Is this one school in another school?
8. Multiple commenters expressed concern around general safety for students in P.S. 224 if this co-location is approved.

9. Multiple commenters expressed concern around the number of safety agents assigned to K224.

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

The DOE received zero (0) voicemails through the dedicated phone line 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

Comment 7(a) is not directly related to the proposal and thus does not require a response.

Comments 2(a-c) are in favor of the proposal and do not require a response.

Comment 7(b) asks about the details of this proposal.

The DOE is proposing to open and co-locate a new site of P.S. K036, an existing District 75 school, to be called “P036K@K224,” in K224 beginning in the 2016-2017 school year. If this proposal is approved, P036K@K224 will be co-located with P.S. 224, an existing district elementary school currently serving students in kindergarten through fifth grade and offering a full-day Pre-K program. A “co-location” means that two or more school organizations are located in the same building and may share common spaces, such as the auditorium, library, gymnasium and cafeteria. If approved, this proposal will add approximately 60-80 District 75 self-contained seats in K224 for District 75 elementary 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.

Details of this proposal can be found in the EIS for this proposal, which is available on the Panel for Educational Policy website at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/April202016SchoolProposals>. Copies of the EIS can also be found in the main office of P.S. 224.

Comment 4 states that this proposal is a change for the P.S. 224 school community and asks that the community’s voices are heard.

The DOE values the voices of the P.S. 224 community and conducted several public engagement events that provided an opportunity for feedback over the course of creating this proposal. On March 2, 2016, representatives from the District 75 office conducted a walkthrough of K224 and held a SLT debrief with the P.S. 224 SLT. At the debrief, DOE representatives were available to answer questions and address concerns from representatives of the P.S. 224 community. Participants included representatives from the DOE’s Office of District Planning and Office of Space Planning, CEC 19, the District 19 Superintendent, the District 75 Superintendent and senior staff of the District 75 office, as well as SLT members from P.S. 224.

The DOE also provided public engagement opportunities after posting this proposal to solicit further public comment and feedback around the proposal. The DOE offered an optional community meeting open to the public prior to the Joint Public Hearing for this proposal, which the P.S. 224 community did not elect to hold. A Joint Public Hearing was held at K224 on April 12, 2016 at 6:00 PM, which was open to the public and at which attendees were encouraged to provide comments on this proposal. Following the posting of this proposal, a dedicated phone line and email address to accept public comment on this proposal were made available to the public.

Comment 3(d) suggests that this proposal will impact the New York State Accountability Status of P.S. 224.

The New York State Education Department (“SED”) assigns an accountability status to each district school—Good Standing, Local Assistance Plan, Focus, or Priority. If this proposal is approved, the opening and co-location of P036K@K224 in K224 with P.S. 224 will not affect the state accountability status of P.S. 224.

Comments 1(a) and 3(e,g) inquire about the reasons that K224 was considered for this proposed co-location.

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. As a result, additional seats are necessary to meet the increased demand for District 75 self-contained programming in Brooklyn and within District 19.

The DOE continuously identifies and examines “under-utilized” buildings, or buildings that have space that could be used more efficiently to accommodate additional students to meet the needs of the borough or the district. K224 has the capacity to serve 735 students. During the current 2015-2016 school year, K224 is serving 502 students, yielding an estimated building utilization rate of 68%. As such, K224 is “under-utilized” and has available space to accommodate the need for additional District 75 seats across Brooklyn and specifically within District 19. Siting P036K@K224 in K224 will add 60-80 District 75 self-contained seats for elementary 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 and within District 19.

Comments 1(c), 3(i) and 6(f) are related to increased traffic and traffic concerns in the areas surrounding K224.

If this proposal is approved, the Office of Pupil Transportation (“OPT”) will work with the school organizations to identify the most appropriate plan for drop-off and pick-up. Final student busing routes will be determined based on the home addresses of students at the school organizations.

To assist with student pedestrian traffic around schools, school crossing guards are allocated by local police precincts. School administrators can contact their local precincts to request additional crossing guards.

That said, based on experience with similar co-locations in other buildings, the DOE does not anticipate issues arising as a result of increased traffic, should this proposal be approved by the PEP.

Comment 3(j) expresses that more parking permits will be needed for the increased number of staff members at K224.

If this proposal is approved, the Department of Transportation (“DOT”) will work with school organizations to ensure each school in a co-located building is getting the correct number of permits. Permits are allocated based on relative enrollments of the co-located schools in any given building.

Comments 3(h), 6(a) and 9 express concern that there will be a potential lack of safety agents for the total number of students in the building, if the proposal is approved.

School Safety Agents (“SSAs”) are assigned 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.

Comments 1(b), 3(a-b, f), 5(a), 6(d) and 8 express concerns about safety in K224 if this co-location occurs.

Due to space limitations across the city, it is not unusual for multiple schools to be co-located in a building together. Pursuant to Chancellor’s Regulation A-414, every school or campus is mandated to form a School Safety Committee. This committee is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency, including a fire safety plan, which entails fire drill and evacuation procedures. School leaders from P.S. 224 and P036K@K224 will form a School Safety Committee at K224 and will develop a School Safety Plan. The School Safety Plan is updated annually by the Committee to meet the changing needs, changes in organization and building conditions and any other factors; these updates can also be made at any other time it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the principals when it identifies the need for additional security measures.

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 K224, to seek support from OSYD to address any issues involving safety and security. As mentioned, 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.

In addition, as stated in the EIS, the DOE makes available the following supports to schools relating to 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 6(g) inquires if separate entrances and exits will be utilized for the co-located schools in K224.

In other co-locations across the city, many co-located schools opt to utilize different entrances and exits to manage the flow of students into and out of a building in a safe manner. There are several entrances to the K224 building and the principals of P.S. 224 and P036K@K224, alongside the Office of Space Planning, may decide to utilize different entrances for different schools, if this proposal is approved.

Comment 3(c) asks whether this proposal is truly intended to co-locate P036K@K224 or whether it is meant to phase-out P.S. 224.

As stated in the EIS, the DOE is proposing to open and co-locate P036K@K224 with P.S. 224. If this proposal is approved, P036K@K224 will be co-located with P.S. 224 beginning in the 2016-2017 school year. This proposal will not result in a phase-out of P.S. 224. As described in the EIS that accompanies this proposal, there is sufficient space for all schools throughout the duration of this proposal according to the Citywide Instructional Footprint (“the Footprint”). The proposed co-location of P036K@K224 is not expected to impact current or future student enrollment, admissions, or instructional programming at P.S. 224.

Comment 6(e) asks how the schools will share one nurse in the building.

All schools in co-located buildings receive services from the school nurse. The nurse is funded through the Office of School Health, which is a joint program between the DOE and the Department of Health. The DOE acknowledges that waiting times may increase if the nurse has to serve more students; however, if the building were enrolled to maximum capacity by a single school organization, the nurse would serve a comparable number of students as in the proposed co-location. The Office of School Health continually reviews staffing and addresses any issues accordingly.

Comments 5(b) and 6(b-c) are related to space issues, including the allocation of space under the proposal and placement of school organizations within the building, if the proposal is approved.

There are currently hundreds of schools in buildings across the city that are co-located, which includes district schools with other district schools, district schools with charter schools, and schools with mixed grade levels. In all cases, the Footprint is applied to schools to ensure equitable allocation of classroom, resource, and administrative space. The Footprint sets forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school and number of classes per grade. For existing schools, the Footprint is applied to the current number of sections per grade, assuming class size will remain constant. A representative from the Office of Space Planning then confirms both the baseline and current space allocation totals during a walk-through of the building, where he/she is accompanied by a school representative.

If this proposal is approved, P.S. 224 and P036K@K224 will receive their baseline or adjusted baseline allocations pursuant to the Footprint. The Office of Space Planning will facilitate the specific placement of P036K@K224 in P.S. 224 pursuant to the Footprint if this proposal is approved. Specific decisions regarding the allocation of the shared spaces and excess space that exists after all school organizations receive their baseline Footprint allocation are made by the Building Council.

After each school has received its baseline or adjusted baseline Footprint allocation, there will be 6 excess full-size rooms remaining in K224 in the 2016-2017 school year. Accordingly, K224 has sufficient capacity to support this proposal. If this proposal is approved, the Office of Space Planning will work with the Building Council to ensure an equitable allocation of the excess space in K224. In determining an equitable allocation, the Office of Space Planning may consider factors such as the relative enrollments of the co-located schools, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building.

More details about space are available in Section III.B and Appendix A of the EIS for this proposal. The Footprint, which guides space allocation and use in city schools, can be found on the DOE website at: <http://schools.nyc.gov/Offices/OSP/KeyDocuments/Instructional Footprint>.

Changes Made to the Proposal.

No changes have been made to this proposal.