

Public Comment Analysis

Date: April 19, 2016

Topic: The Proposed Consolidation of Collaborative Academy of Science, Technology, & Language-Arts Education (01M345) and Grades 6-8 of Henry Street Secondary School for International Studies (01M292) with University Neighborhood Middle School (01M332) in Building M056 Beginning in the 2016-2017 School Year

Date of Panel Vote: April 20, 2016

Summary of Proposal

On February 5, 2016, the New York City Department of Education (“DOE”) posted an Educational Impact Statement (“EIS”) and Building Utilization Plan (“BUP”) proposing to consolidate Collaborative Academy of Science, Technology, & Language-Arts Education (01M345, “CASTLE”), an existing middle school that currently serves students in sixth through eighth grades, and the middle school grades of Henry Street Secondary School for International Studies (01M292, “Henry Street”), an existing secondary school currently serving students in seventh through twelfth grades,¹ with University Neighborhood Middle School (01M332, “UNMS”), an existing middle school serving students in sixth through eighth grades, in the 2016-2017 school year.

The DOE is proposing to consolidate CASTLE, Henry Street’s middle school grades, and UNMS because these schools have struggled with low enrollment, which creates budgetary and programmatic challenges. A “consolidation” means that two or more existing school organizations are combined into one school to operate and serve students more effectively. If this proposal is approved, CASTLE, Henry Street’s middle school grades, and UNMS will be combined such that students, staff, and resources of CASTLE and Henry Street’s middle school grades will become part of UNMS. CASTLE and Henry Street will no longer exist as distinct middle school options for the 2016-2017 school year

CASTLE, Henry Street, and UNMS are all currently co-located in building M056 (“M056”) with Manhattan Charter School II (84M080, “MCS II”), an existing public charter school that currently serves students in kindergarten through fourth grade and is phasing in to serve students in kindergarten through fifth grade beginning in the 2016-2017 school year. M056 also houses two community-based organizations (“CBOs”): Henry Street Settlement and Turning Point. In addition, M056 houses a special educational facility, the New York City Center for Space and Science Education (“NYCCSSE”) and a School Based Health Clinic (“SBHC”). If this proposal is approved, Henry Street Settlement, Turning Point, the New York City Center for Space and Science Education, and the SBHC will continue to provide services and maintain their space in M056.

On April 4, 2016, DOE posted a revised EIS and BUP based on feedback received. The revised BUP updated the number of rooms designated as shared spaces in the 2016-2017 school year and beyond, including: allocating the educational facility, NYCCSSE,² additional rooms to meet program demand and allow for expanded programmatic

¹ Until the current school year, Henry Street served students in grades six through twelve. For the 2015-2016 school year, fewer than 10 students enrolled in the sixth grade at Henry Street. As such, each of these students was offered the opportunity to enroll at another school and worked with the District 1 Superintendent to identify an option that met his or her needs. Consequently, Henry Street does not currently serve any sixth-grade students

² NYCCSSE is an educational facility that hosts visits for classes throughout the city aimed at increasing students’ interest and excitement about science, technology, engineering and math through space and aviation science, using simulated space experiences. NYCCSSE offers single and multi-day class visits, week-long camps during spring break and summer vacation, extended in-school and after-school programs about aviation, engineering, and robotics, and also offers professional development for teachers. NYCCSSE has seen increased demand for its program and sought additional space to expand to serve more students throughout the city.

offerings; designating all the science demonstration rooms and science laboratories in M056 as shared spaces; and removing a shared classroom from the list of shared spaces in M056 because the building will no longer be configured in a way that requires this space to be shared between multiple organizations. These changes resulted in changes to the number of excess rooms available to be allocated to each school organization in M056. The DOE also revised the proposed Shared Space Plan (“SSP”) for the 2016-2017 school year to reflect a gymnasium schedule that has been approved by all the schools in the building. The DOE revised the EIS to reflect changes made to the revised BUP.

The New York State Education Department (“SED”) assigns an accountability status to each district school—Good Standing, Local Assistance Plan (“LAP”), Focus, or Priority. CASTLE and UNMS are identified as schools in Good Standing, and Henry Street is identified as a Priority school. If this proposal is approved, the newly consolidated school would not inherit the “Priority” state accountability status of Henry Street. Rather, the current state accountability status of UNMS as a school in Good Standing would remain. However, Henry Street will continue to serve grades nine through twelve as a separate high school organization. As such, Henry Street will retain its Priority status.

In addition, Henry Street is currently one of a cohort of 94 schools that have been designated by the DOE as Renewal Schools. Schools selected to be Renewal Schools were assigned the state accountability status of Priority or Focus Schools by the State Department of Education, demonstrated low academic achievement (in 2012, 2013, and 2014), and scored “Proficient” or below on their most recent Quality Review. (In four instances—but not in the case of Henry Street—schools were selected to be Renewal Schools per the Chancellor’s discretion.) Henry Street is currently a Renewal school.

As a Renewal School, Henry Street is being transformed into a Community School. Community Schools are intended to be neighborhood hubs where students receive high-quality academic instruction, families can access social services, and communities congregate to share resources and address their common challenges. The consolidated school would not be designated as a Renewal or Community School, but Henry Street would maintain its designation as a both a Renewal and Community School for its remaining high school grades.

Henry Street currently receives a School Improvement Grant (“SIG”), which is planned to continue through the 2016-2017 school year. If this proposal is approved, Henry Street is expected to continue receiving SIG funding for its high school grades, although the exact amount is uncertain. Henry Street also receives a 21st Century Grant. If this proposal is approved, the portion of this grant associated with Henry Street’s middle school grades will shift to the consolidated UNMS, while the portion designated for the high school students will remain with Henry Street.

UNMS is currently receiving School Innovation Funding (“SIF”), which is planned to continue through the 2016-2017 school year. This proposal will not interfere with UNMS’s ability to continue receiving its SIF award. UNMS also receives a 21st Century grant. If this consolidation is approved, UNMS will continue to receive this grant.

The DOE is proposing to consolidate CASTLE and Henry Street’s middle school grades with UNMS based primarily on the benefits students in all the school communities would derive from the additional resources made available by combining the three school organizations into one. If this proposal is approved, CASTLE and Henry Street students attending the consolidated UNMS will have access to a variety of academic and enrichment opportunities, interventions, and other supports that would not be financially feasible for any of the schools to offer in the absence of consolidation. For example, the consolidated UNMS will be able to increase its visual arts programming as a result of the increased resources resulting from the consolidation. In addition, the consolidation will allow the schools to combine the strengths and best practices of each individual school into a single, larger organization. Furthermore, the consolidation will enable Henry Street—which will serve only high school grades if this proposal is approved—to focus on enhancing its high school programming and tailoring its curriculum, theme, and culture to provide a more robust and enriching high school experience to its students.

This proposal has been developed by the District 1 Superintendent in conjunction with the principals of the consolidating schools and the school communities through a collaborative planning process. In addition to working with the school communities, the Superintendent has worked closely with various DOE offices and the principals of CASTLE, Henry Street, and UNMS to determine the best path to support the students at the schools. The

collaborative planning process culminated in a decision to consolidate these schools into one stronger middle school option

Collaboration between CASTLE, Henry Street, and UNMS has already begun. These schools are already co-located, and throughout the remainder of the 2015-2016 school year, staff from all three schools will increase collaboration, focusing on developing shared instructional practices, sharing resources, and building a cohesive school culture. In addition to these efforts, the schools have initiated collaborative planning activities with staff and families. These activities will continue throughout the year to ensure the consolidation is seamlessly executed in the 2016-2017 school year, if approved

M056 has the capacity to serve a total of 1,369 students. If this proposal is approved, in 2016-2017, UNMS is expected to absorb the enrollment of CASTLE and Henry Street's middle school grades and will serve a projected 230-260 students in sixth through eighth grades, Henry Street will serve a projected 125-165 students in ninth through twelfth grades, and MCS II will serve a projected 235-295 students in kindergarten through fifth grade. This will result in a total projected building enrollment of 590-720 students in M056, yielding a projected building utilization rate of 43%-53%. Additional enrollment and utilization information is detailed in the following section.

The details of this proposal have been released in a revised EIS and revised BUP which can be accessed here:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/April202016SchoolProposals>

Copies of the revised EIS and revised BUP are also available in the main offices of the following schools: UNMS, CASTLE, Henry Street, and MCS II.

Summary of Comments Received at the Joint Public Hearings

A Joint Public Hearing regarding the original proposal was held at M056 on March 8, 2016. At the hearing, interested parties had an opportunity to provide input on the original proposal.

On March 8, 2016 approximately 35 people attended the hearing and 15 people spoke. Present at the meeting were: Deputy Chancellor Dorita Gibson; District 1 Superintendent Daniella Phillips; Community Education Council 1 ("CEC 1") member Marco Battistella; CEC 1 member Luke Henry; Laura Peynado Castro, principal of UNMS and representative of the School Leadership Team ("SLT"); Anthony Chianese, Interim Acting Principal of CASTLE and representative of the SLT; Miles Doyle, Interim Acting Principal of Henry Street and representative of the SLT; Carissa Page, principal of MCS II and representative of the SLT; Yael Goldberg, representative of the UNMS SLT; and Michael Locker, a representative of the UNMS SLT. Sarah Turchin, Deepa Desai, Anderson Reyes, and Eric Herman from the DOE were also present.

An additional Joint Public Hearing regarding the revised proposal was held on April 18, 2016 at M056. At the hearing, interested parties had an opportunity to provide input on the revised proposal. Approximately 14 members of the public attended the hearing and 7 spoke. Present at the meeting were: Deputy Chancellor Elizabeth Rose; District 1 Superintendent Daniella Phillips, CEC 1 member Marco Battistella; CEC 1 member Jill Pierce; Citywide Council on High Schools member Michael Kraft; Laura Peynado Castro, principal of UNMS and representative of the SLT; Anthony Chianese, Interim Acting Principal of CASTLE and representative of the SLT; Miles Doyle, Interim Acting Principal of Henry Street and representative of the SLT; Carissa Page, principal of MCS II and representative of the SLT; Yael Goldberg, representative of the UNMS SLT; and Richard Udewitz, representative of the CASTLE SLT; Sarah Turchin and Eric Herman from the DOE were also present.

The following comments and remarks were made at the Joint Public Hearing on March 8, 2016 regarding the original proposal:³

1. CEC 1 member Marco Battistella stated the following:
 - a. He is happy that the schools are being given the opportunity to grow by consolidating.
 - b. He is concerned that the BUP does not allocate sufficient space to the district schools in M056 to grow.

³ These comments were made regarding the original proposal. However, the DOE's responses reflect the revised proposal, which contains the most current information about room allocations, etc.

2. A UNMS SLT member, Yael Goldberg, stated the following:
 - a. She is concerned that UNMS is supposed to absorb teachers that were not a part of UNMS's development program.
 - b. She wants the UNMS principal to be able to choose the teachers at the consolidated school.
 - c. She wants the consolidated school to be located on one floor of the building.
 - d. She is concerned about safety at the school.
 - e. She wants to know why the Panel for Educational Policy ("PEP") meeting is scheduled to be held in Brooklyn.
3. A UNMS SLT member, Michael Locker, stated the following:
 - a. He is grateful for the consolidation and the opportunity it provides the UNMS community to grow, instead of struggling because of low enrollment.
 - b. He is concerned about UNMS maintaining its values and community after this consolidation is approved.
 - c. He is concerned that some teachers that have helped to build UNMS's school community might be pushed out because of seniority rules.
 - d. He is concerned about space allocation and does not want UNMS to be located across multiple floors of the building.
4. The District 1 Superintendent stated the following:
 - a. She strongly believes in Laura Peynado Castro, the principal of UNMS, as a leader in the district who will make consolidation a success.
 - b. She thinks there are amazing staff, teachers, and leaders at the consolidating schools that have been working together and collaborating to make this proposal a success.
 - c. She would like each school organization in the building to have its own identity in terms of space, and for each school to have its own floor.
 - d. She thinks this proposal needs to ensure there is room for growth at the consolidated UNMS and Henry Street.
 - e. There will be revisions to the BUP to allocate the NYCCSSE additional space to meet increased demand for the program and to take into consideration the natural boundaries' of the building when planning the space.
5. A student from UNMS stated the following:
 - a. He thinks that the unused space in M056 should go to all the schools in the building and should be distributed evenly.
 - b. He thinks that there need to be more programs at UNMS.
 - c. He thinks that all students should have the ability to learn and it does not matter if they are in a charter school or in a district school
 - d. He supports the consolidation proposal.
6. A parent from UNMS stated the following:
 - a. She is concerned about under-utilization in the building and whether that will result in another proposal for M056, such as a grade expansion for MCS II or a new charter co-location.
 - b. She understands why the schools are consolidating and supports the decision.
 - c. She wants to know how many rooms each organization in the building will be allocated.
7. A parent from UNMS stated the following:
 - a. She is concerned about safety.
 - b. She wants students who require specialized services to be able to retain their services.
 - c. She is concerned that class sizes at the consolidated school will be large.
8. The principal of UNMS, Laura Peynado Castro, stated the following:
 - a. While parents have concerns about the safety and welfare of their children, she and her staff are going to work to do everything to keep children safe.
 - b. She does not think the Instructional Footprint reflects the needs of the students at her school and the mandated services that her students need.
 - c. She wants the DOE to be mindful of the sustainability of this plan for the consolidated UNMS and Henry Street.
 - d. She would hate if any of her colleagues at UNMS, who have been working relentlessly to support the school, lose their jobs because of contractual mandates.
 - e. She believes in the consolidation.
 - f. She does not feel like the BUP was developed in consultation with the schools.

9. The Interim Acting Principal of Henry Street, Miles Doyle, stated the following:
 - a. He thinks the consolidation has the potential to be an incredibly positive thing for this community.
 - b. He thinks this proposal should be about helping Henry Street grow and ensuring safety at the school.
 - c. He thinks that students' needs should be at the center of these conversations and proposals.
10. The Interim Acting Principal of CASTLE, Anthony Chianese, stated the following:
 - a. He is confident that Principal Laura Peynado Castro will do the right thing for students.
 - b. The consolidating schools have a disproportionate number of students with high needs that should be taken into account with this proposal.
 - c. He wants to know what additional resources will be brought to the school.
11. The principal of MCS II, Carissa Page, stated the following:
 - a. There are no current plans for MCS II to expand to middle school in M056.
 - b. She looks forward to working with Laura Peynado Castro and Miles Doyle on a plan for the shared spaces in the building that can best serve all students.
12. A CEC 1 member, Luke Henry, expressed the following:
 - a. He asked if the proposal is going to be revised.
 - b. He asked if the building is going to undergo renovations and if the DOE could commit to making the building accessible, instead of partially accessible, the current accessibility status.
 - c. He wants a commitment from MCS II that it will not expand to middle school.
13. A parent from CASTLE stated the following:
 - a. He feels confident about the staff of both schools.
 - b. He is concerned about safety.
 - c. He wants the auditorium to be fixed.
14. A parent from UNMS asked the following:
 - a. Why does MCS II have more time in the cafeteria and gym according to the proposed SSP?
15. A teacher from CASTLE stated the following:
 - a. She thinks the SSP plan needs to be adjusted to meet the special needs that the consolidated UNMS student population will have.
 - b. She is concerned about the school building getting a library.

The following comments and remarks were made at the Joint Public Hearing on April 18, 2016 on the revised proposal:

16. CEC 1 member, Marco Battistella, stated the following
 - a. The CEC thinks this consolidation proposal is a good idea.
 - b. He is happy with the revisions made to the BUP and the EIS.
17. The principal of MCS II, Carissa Page, stated the following:
 - a. She thinks the consolidation is a good idea and makes sense.
18. The Interim Acting Principal of Henry Street, Miles Doyle, stated the following:
 - a. He is a firm believer in the consolidation.
 - b. He looks forward to working with the building council on the SSP.
19. The principal of UNMS, Laura Peynado Castro, stated the following:
 - a. She is concerned with the sustainability of the consolidation plan.
 - b. She is concerned about the potential of MCS II expanding to middle school in M056.
20. The Interim Acting Principal of CASTLE, Anthony Chianese, stated the following:
 - a. He wants the proposal to take into account students with special needs.
21. A member of CASTLE's SLT, Richard Udewitz, asked the following:
 - a. When will teachers be able to see the combined seniority lists?
 - b. When will teachers find out if they are being excessed?
 - c. If teachers are excessed, will they be placed in District 1?
 - d. What measures are being taken to ensure a more balanced population of students attend the consolidated UNMS?
22. A member of UNMS's SLT, Yael Goldberg, stated the following:
 - a. She is concerned about larger class sizes at the consolidated UNMS.
 - b. She wants each of the schools in the building to have its own separate floor.

- c. She thinks this proposal needs to take into account the large amount of students with special needs at the consolidating schools.
- d. She disagrees with M056's building target capacity being approximately 1,300 students.

Summary of Issues Raised in Written and 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 and Significant Alternatives Proposed

Comments 1(a), 3(a), 5(d), 6(b), 8(e), 9(a), 16(a,b), 17(a), 18(a) are in support of the proposal and thus do not require a response.

Comments 5(c), 12(b), and 13(c) are not directly related to the proposal and thus do not require a response.

Comments 4(a,b), 10(a), 13(a) expressed support for the teachers, staff, or administrators at the schools in M056.

The DOE recognizes the hard work of all of the schools in M056 and commends the teachers, staff, and administrators for their dedication.

Comments 2(d), 7(a), 8(a), 9(b) and 13(b), expressed concerns about general school safety.

Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which 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. The School Safety Plan is updated annually by the Committee to meet changing security needs, changes in organization and building conditions, and any other factors. Updates can also be made at any other time if it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the principal(s) 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 M056, 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.

In addition, 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.

The DOE is committed to supporting the schools in M056 throughout the implementation of this consolidation proposal and thereafter to ensure student safety.

Comment 2(e) expresses the sentiment that since this proposal pertains to schools in Manhattan, the PEP meeting to vote on this proposal should be held in Manhattan.

At any given meeting, the PEP votes on several proposals impacting schools across the city and the monthly meeting locations vary from month to month. Throughout the school year, PEP meetings rotate amongst locations throughout all five boroughs. All boroughs host at least one PEP meeting per calendar year. Locations are chosen based on the school's ability to accommodate large public meetings and convenience to public transportation as well as accessibility.

This proposal was originally scheduled for vote at the March PEP meeting, which was held in Brooklyn. However, this revised proposal will be voted on the April PEP meeting, which will be held in Manhattan.

Comments 1(b), 2(c), 3(d), 4(c,d), 5(a), 6(c), 8(b), 9(b), and 22(b) are in regard to space within M056, including the placement of the each organization in the building and the ability for schools in M056 to expand or grow.

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.

The Footprint is available online at: [http://schools.nyc.gov/Offices/OSP/KeyDocuments/Instructional Footprint](http://schools.nyc.gov/Offices/OSP/KeyDocuments/Instructional_Footprint).

In response to Comment 6(c), which inquires about space allocations for each school. As stated in the revised EIS and the revised BUP, if this proposal is approved, all schools in M056 will receive space according to their baseline Footprint allocation of space pursuant to the Citywide Instructional Footprint. After each school in M056 has received its baseline or adjusted baseline Footprint allocation in accordance with the Footprint, there will be an excess of 15 full-size rooms, 4 half-size rooms, 4 quarter-size rooms, and 1.0 full-size equivalent ("FSE") rooms of designed administrative space remaining in the building in the 2016-2017 school year. If this proposal is approved, excess space in M056 will be allocated proportional to the schools' projected enrollments, while also taking into account the physical location of excess space within the building. If this proposal is approved, UNMS will be allocated 7 full-size rooms and 1 quarter-size room in excess of its baseline Footprint allocation. Henry Street's allocation will include 3 full-size rooms, 4 half-size rooms, 2 quarter-size rooms, and 1.0 FSE of designed administrative space in excess of its baseline Footprint allocation. MCS II's allocation will be 5 full-size rooms and 1 quarter-sized room in excess of MCS II's baseline Footprint allocation. The Office of Space Planning will work with the Building Council to place each school organization in the building to have the space allocation published in the revised BUP, which can be accessed on the PEP website at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2015-2016/April202016SchoolProposals>.

In response to comments 1(b), 4(d) and 9(b), which express concern over the ability of the consolidated UNMS and Henry Street to expand, if this proposal is approved: each school in M056 will receive its equitable allocation of space per the Footprint. Even after the schools receive their baseline or adjusted baseline allocation of space under the Footprint, there will still be excess rooms available in the building which can support school growth.

Comments 2(a,b), 3(c), 8(d), and 21(a-c) pertain to staffing and potential excessing at the consolidated UNMS.

As discussed in the revised EIS that describes this proposal, some CASTLE, Henry Street, and/or UNMS staff members may be excessed when the schools are consolidated. Where possible, the DOE will seek to minimize excessing of represented staff during any approved school consolidation. In the event that staff excessing is required, staff from CASTLE, Henry Street, and UNMS will be merged into a list to determine seniority by license as appropriate and in accordance with applicable collective bargaining agreements. All contractual rules regarding excessing will apply. Barring system-wide layoffs, excessed teachers will be eligible to apply for other City positions, and any teachers who do not find a permanent position will be placed in the absent teacher reserve pool ("ATR"), meaning that they will continue to earn their salary while serving as substitute teachers in other City schools.

This proposal is not expected to impact the staffing of MCS II.

In response to [comment 21\(a\)](#) regarding when the seniority list will be available: if this proposal is approved, the schools' seniority lists are expected to be combined sometime in May 2016. Once combined, teacher seniority will be available to the principals for review and share with principals as needed.

In response to [comment 21\(b\)](#), which inquires about when teachers will find out they are being excessed: the goal of this consolidation proposal is to retain individual school community members to the extent possible, not to excess teachers. If, after receiving next year's budget and taking into account resignations, retirements, and voluntary transfers of school staff, the principal needs to excess staff members, they will be notified in accordance with the UFT/DOE collective bargaining agreement.

In response to [comment 21\(c\)](#), which inquires about whether excessed teachers will be placed in District 1, excessing will depend on many factors, which include but are not limited to: budget, student enrollment, resignations, retirements, and program requirements. If excessed, teachers will be assigned schools within their appointed seniority district and in accordance with the UFT/DOE collective bargaining agreement.

With specific reference to [comments 2\(a,b\)](#), which express concern over UNMS absorbing teachers from CASTLE and Henry Street, as well as about staffing at the consolidated UNMS-- if this proposal is approved, CASTLE, Henry Street's middle school grades, and UNMS will be combined such that students, staff, and resources of CASTLE and Henry Street's middle school grades will become part of UNMS. CASTLE and Henry Street will no longer exist as distinct middle school options for the 2016-2017 school year. Laura Peynado Castro, who will be the principal of the consolidated UNMS, will administer the same development program for all teachers and staff at the school for the 2016-2017 school year. As stated by Laura Peynado Castro at the Joint Public Hearing on March 8, 2016, the teachers at UNMS, CASTLE, and Henry Street are already sharing professional development best practices, which is expected to facilitate the consolidation, if approved.

[Comments 7\(b\) and 10\(b\)](#) expressed concern about what the consolidation would mean for students with disabilities and students with special needs with respect to retaining their mandated services. [Comment 10\(b\), 20\(a\), and 22\(c\)](#) further expressed that his proposal needs to take into account the number of students the consolidating schools have with special needs.

UNMS, CASTLE, and Henry Street serve general education students and students requiring special education services, including students currently enrolled in Integrated Co-Teaching and Self-Contained special education classes and students receiving Special Education Teacher Support Services and related services. Students with disabilities will continue to receive services in accordance with their Individualized Education Programs, if this proposal is approved. Services are tailored to meet the individual needs of the students with disabilities currently enrolled and, as such, may vary from year to year. All current and future students enrolled at the consolidated UNMS will continue to receive all mandated services if this proposal is approved, and all schools will have sufficient space within their Footprint allocation to meet their students' needs.

Most funding in schools' budgets is allocated on a per-pupil basis, based on Fair Student Funding per capita allocation levels. UNMS's total enrollment is expected to increase as a result of the consolidation, and as a result UNMS's budget is expected to increase to reflect the additional pupils. Schools also receive additional funds for students with disabilities, English Language Learner students, and those students with other supplemental academic needs. This consolidation will result in increased resources, which will allow the schools to combine the strengths and best practices of each individual school into a single, larger organization.

[Comment 3\(b\)](#) expressed concern about UNMS maintaining the values and community they have already developed through the consolidation.

The DOE believes that consolidations will combine the strengths and best practices of each individual school into a single, larger organization. As Daniella Phillips, the District 1 Community Superintendent, expressed at the Joint Public Hearing on March 8, 2016, there are many challenges to merging school communities but UNMS, CASTLE, and Henry Street have strong leadership, staff, and principals that will help with collaboration and blending the school communities together.

Comments 7(c) and 22(a) expressed concern that this proposal will lead to larger class sizes.

If this proposal is approved, the DOE projects that the combined enrollment of the consolidated UNMS would range from 80-90 students, or three sections per grade. While these classes may be larger than some of the current classes offered at either UNMS, CASTLE, or Henry Street, these classes are not expected to exceed the UFT contractual maximum for serving students, which is 30 students per class for a Title I school.

In addition, the goal of a larger student population is one reason why this proposal is being submitted to the PEP, as the current low enrollment numbers at UNMS, CASTLE, and Henry Street have led to budgetary challenges for the schools to offer diverse and enriched curricula and extra-curricular activities. Though small class sizes may offer teachers additional opportunity to spend more time on individual student needs, small class sizes can cause budgeting and operational difficulties for a school to function more broadly. If in fact class sizes do increase at the consolidated UNMS, the DOE is confident that teachers and staff at UNMS will be able to continue effectively serving the students that they teach.

Comments 4(e) and 12(a) relate to requests that the original proposal being revised.

In response to comments such as these, and other concerns expressed at the joint public hearing on March 8, 2016, on April 4, 2016 the DOE posted a revision to the EIS and BUP for this proposal. The revised BUP updated the number of rooms designated as shared spaces in the 2016-2017 school year and beyond, including: allocating the educational facility, NYCCSSE, additional rooms to meet program demand and allow for expanded programmatic offerings; designating all the science demonstration rooms and science laboratories in M056 as shared spaces; and removing a shared classroom from the list of shared spaces in M056 because the building will no longer be configured in a way that requires this space to be shared between multiple organizations. These changes resulted in changes to the number of excess rooms available to be allocated to each school organization in M056. The DOE also revised the proposed SSP for the 2016-2017 school year to reflect a gymnasium schedule that has been approved by all the schools in the building. The DOE revised the EIS to reflect changes made to the revised BUP.

The Office of Space Planning will work with the Building Council to place each school organization in the building to have the space allocation published in the revised BUP and to establish natural boundaries between schools where possible.

Comments 5(b) and 10(c) expressed the need for increased programs and resources for the school.

The DOE is proposing to consolidate CASTLE and Henry Street's middle school grades with UNMS based primarily on the benefits students in all the school communities would derive from the additional resources made available by combining the three school organizations into one. If this proposal is approved, CASTLE and Henry Street students attending the consolidated UNMS will have access to a variety of academic and enrichment opportunities, interventions, and other supports that would not be financially feasible for any of the schools to offer in the absence of consolidation. For example, the consolidated UNMS will be able to increase its visual arts programming as a result of the increased resources resulting from the consolidation.

Comments 6(a), 11(a), 12(c) and 19(b) are related to concerns about future proposals for M056, such as MCS II expanding to serve middle school grades or another organization being sited in the building.

The PEP originally approved the opening and co-location of MCS II's kindergarten through fifth grade in M056 on March 21, 2012. For the 2016-2017 school year MCS II will be fully phased into M056. MCS II has not applied to expand to middle school grades and is only approved to serve students in kindergarten through fifth grade in M056. More information about the original proposal can be found at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm>.

Any future significant changes to school utilization in M056 would be proposed in a future EIS and will be subject to separate approval by the PEP in accordance with Chancellor's Regulation A-190.

Comment 9(c) conveyed that students' needs should be at the center of these proposals

The DOE also believes that students' needs should be at the center of these proposals. Consolidation decisions are made on a case-by-case basis in partnership with the superintendent and impacted school communities. They are intended to improve under-enrolled schools and address the budgetary, programmatic, and performance challenges that arise as a result of low enrollment. A consolidation may also be proposed to allow the DOE to leverage a particularly strong school leader. Since most funding in schools' budgets is allocated on a per-pupil basis based on Fair Student Funding per capita allocation levels, schools that struggle with low enrollment may also subsequently struggle with funding issues. For example, they may not be able to afford the full range of services or specialized instruction. Consolidations support healthy school enrollment so that schools have the budgets necessary to operate effectively. Other potential benefits of consolidations include increased access to resources and improvements in school performance.

In this case, the DOE has considered the needs of the students at the schools in M056 and believes this consolidation proposal to be in their best interest.

Comments 8(c) and 19(a) expressed concerns about the sustainability of this proposal.

The DOE believes that the consolidation of CASTLE and Henry Street's middle school grades with UNMS will benefit the CASTLE, Henry Street, UNMS, and District 1 communities by strengthening middle school options and providing increased services at the consolidated UNMS. As described above, this proposal has been developed through a collaborative planning process that included central DOE staff, the District 1 Superintendent, the Superintendents' staff, the principals of the schools proposed for consolidation, and the respective school communities.

CASTLE has experienced a significant drop in enrollment, from 262 students in the 2010-2011 school year, to 104 students in the 2015-2016 school year, a decline of 60%. Henry Street's middle schools grades have also experienced a significant drop in enrollment from 116 students in 2010-2011 school year, to 25 students in 2015-2016, a decline of 78%. UNMS has not seen a significant decline in enrollment but as of the 2015-2016 school year has an enrollment of 110 students. Schools that struggle with low enrollment often simultaneously encounter budgetary issues because school funding is allocated on a per-pupil basis. The consolidation of CASTLE, Henry Street, and UNMS will result in a healthy enrollment at the consolidated UNMS and provide the budget required to run effectively. Because of the increased resources, the consolidated UNMS will be able to enhance programs offered, creating a stronger school environment and an improved middle school option for the community.

Furthermore, the consolidation will enable Henry Street—which will serve only high school grades if this proposal is approved—to focus on enhancing its high school programming and tailoring its curriculum, theme, and culture to provide a more robust and enriching high school experience to its students.

Comment 8(f) expressed that the BUP was not developed in consultation with the school communities.

Although the original BUP was developed in consultation with the school communities, based on further feedback provided during the public comment period, the DOE made substantial changes (outlined above, regarding shared spaces and the SSP) resulting in a revised BUP and EIS to be responsive to community concerns.

Comments 11(b) and 18(b) expressed excitement for the collaboration process in development of the SSP at M056.

The DOE commends and supports collaboration among school organizations in the development of a SSP for co-located schools. The revised BUP reflects a gymnasium schedule that was developed collaboratively by the M056 Building Council.

Comments 14(a) and 15(a) expressed concern about the SSP and about the fact that it allocated more time in the gymnasium and cafeteria to MCS II.

The proposed SSP is based on the projected enrollments for the consolidated UNMS, Henry Street's high school grades, and MCS II. The reason why MCS II is allocated more time in the cafeteria for lunch than the consolidated UNMS and Henry Street is because its projected enrollment for the 2016-2017 school year is greater than the other school organizations in the building. The scheduled times in the cafeteria for breakfast are based on

the current schedules of the schools and are not based on projected enrollment because, traditionally, not all students have opted to participate in the breakfast program at UNMS, Henry Street, or MCS II.

The DOE has taken community feedback into consideration regarding the gymnasium schedule. Because of the varying needs of the schools in M056, time in the gymnasium will not be allocated proportionally to the schools' projected enrollments. The proposed gymnasium schedule in the revised BUP has been proposed and approved by the M056 Building Council.

Comment 15(b) expressed concern about M056 getting a library with this proposal.

M056 currently has a library located on the second floor of the building. This space is primarily used by MCS II as a classroom. This revised proposal allocates the library to all organizations in M056 as a shared space, according to the projected enrollments of the schools in the building.

Comment 22(d) expressed concern about the accuracy of the target capacity of M056 published in the Blue Book.

The capacity figures in the Blue Book are based on the manner in which rooms in a school building are utilized. Capacity is calculated with information provided by principals in the Annual Facilities Survey conducted by the School Construction Authority. The survey verifies the usage and size of rooms within each building. The Blue Book includes a building's "target capacity," which reflects aspirational goals for school buildings, making different assumptions about how classrooms are used. The "target capacity" provided in the revised (and original) proposal accurately reflects the information contained in the Blue Book for M056.

Comment 21(d) asked what measures are being taken to ensure a more balanced population of students attend the consolidated UNMS.

As part of the proposal to consolidate schools, principals are collaborating to highlight successful practices of each individual school community and to redesign aspects of the proposed consolidated school's curriculum and program, while ensuring every student continues to be served appropriately. Principals will be working closely with their superintendent and the Office of Student Enrollment on an enrollment strategy that attracts a wide range of students and supports the needs of their communities.

Changes Made to the Proposal

In response to feedback received during the public comment period for the original EIS and BUP, on April 4, 2016, the DOE revised the EIS and BUP for this proposal. The revised BUP updated the number of rooms designated as shared spaces in the 2016-2017 school year and beyond, including: allocating the educational facility, NYCCSSE, additional rooms to meet program demand and allow for expanded programmatic offerings; designating all the science demonstration rooms and science laboratories in M056 as shared spaces; and removing a shared classroom from the list of shared spaces in M056 because the building will no longer be configured in a way that requires this space to be shared between multiple organizations. These changes resulted in changes to the number of excess rooms available to be allocated to each school organization in M056. The DOE also revised the proposed SSP for the 2016-2017 school year to reflect a gymnasium schedule that has been approved by all the schools in the building. The DOE revised the EIS to reflect changes made to the revised BUP.