

Exhibit E

Public Comment Analysis

Date: February 27, 2018

Topic: The Proposed Closure of P.S. 25 Eubie Blake School (16K025) in Building K025 at the End of the 2017-2018 School Year

Date of Panel Vote: February 28, 2018

Summary of Proposal

On January 5, 2018, the New York City Department of Education (NYCDOE) issued an Educational Impact Statement (EIS) describing a proposal to close P.S. 25 Eubie Blake School (16K025), referred to as P.S. 25, in building K025 at the end of the 2017-2018 school year. P.S. 25 is an existing zoned elementary school serving students in grades K-5 and offering a pre-Kindergarten (pre-K) program. P.S. 25 is currently co-located with Success Academy – Bed Stuy 3 (84K883), referred to as SA Bed Stuy 3, in building K025, located at 787 Lafayette Avenue, Brooklyn, NY, 11221 in Community School District 16. SA Bed Stuy 3 currently serves students in grades K-2 and will add one grade each year until it reaches full scale and serves students in grades K-4 in the 2019-2020 school year. K025 also houses the community-based organization (CBO) Urban Dove.

A co-location means that two or more school organizations are located in the same building and may share common spaces, such as:

- Auditoriums;
- Gymnasiums;
- Libraries; and
- Cafeterias.

The EIS for this proposal was amended to reflect the space used by Urban Dove in K025. The original EIS failed to allocate 1 full-size room to Urban Dove, and instead allocated that 1 room to P.S. 25 as excess. Corrections were also made to the list of P.S. 25's current extra-curricular activities, sports, and partnerships in Section III.A of the EIS to reflect the most current information available. Additionally, a correction was made in Section III.B in order to reflect that SA Bed Stuy 3 is allocated 8 full-size rooms in excess rather than 9 full-size rooms in excess in the 2017-2018 school year; SA Bed Stuy 3's total space allocation for the 2017-2018 has not been changed.

The NYCDOE is proposing the closure of P.S. 25 based on its persistently low enrollment and lack of demand from students and families. If this proposal is approved, P.S. 25 will close at the end of the 2017-2018 school year and will no longer exist as an elementary school option in the 2018-2019 school year. All students continuing in elementary school will receive an alternative elementary school option before being discharged from the closing school.

If the proposed closure is approved, NYCDOE staff will work individually with all current students in grades K-4 as well as current students in grade 5 who do not meet promotional criteria, to identify a strong school option that meets their needs. These families will receive a customized application with

elementary school options within District 16 whose performance approaches P.S. 25's and a small number of options outside of District 16 whose performance exceeds that of P.S. 25. Families will be matched to another school for the 2018-2019 school year. The superintendent's office and the Family Welcome Center (FWC) counselors will provide individualized enrollment support to help students and families in thinking through the options presented in order to ensure that students choose the right school to continue their education for the 2018-2019 school year and beyond. NYCDOE staff will also work with schools that are listed on the application to hold tours for prospective families from P.S. 25.

All current pre-K students will participate in the standard kindergarten admissions process as described in Appendix C, and current 5th grade students who meet promotional criteria will enroll in the middle school to which they are matched in the standard middle school admissions process. For further information about elementary school and middle school admissions, see Appendix C of the amended Educational Impact Statement (EIS) or visit the NYCDOE's website at: <http://schools.nyc.gov/choicesenrollment/elementary/default.htm>.

If this proposal is approved, students residing in the current P.S. 25 elementary school zone will no longer have access to their zoned option as of the 2018-2019 school year. The Office of District Planning and the District 16 Community Superintendent are working with Community Educational Council 16 to develop a rezoning plan for the zone that currently serves P.S. 25. Regardless of whether or not a rezoning plan is in place by the 2018-2019 school year, all students residing in the current P.S. 25 zone applying for kindergarten for the 2018-2019 school year will receive an offer consistent with the standard kindergarten admissions process described in Appendix C of the amended EIS.

There is sufficient capacity across other elementary schools throughout District 16 to accommodate future students who might have enrolled in P.S. 25. For further information about capacity to accommodate elementary school students across District 16, see Section III.D of the amended EIS.

The NYCDOE has implemented an expanded support and supervision structure that allows for regular engagement and evaluation of schools to ensure that every student in New York City receives a high-quality education and is prepared for college and career. As a result, the NYCDOE has identified schools, including P.S. 25, that have experienced persistently low enrollment and lack of demand by students and families. At P.S. 25, these ongoing challenges have contributed to a loss of per-pupil funding, potentially resulting in fewer academic, extracurricular, and athletic opportunities than schools with robust enrollment. Teachers have few opportunities for instructional collaboration with colleagues as they are often the only staff member teaching a particular grade.

P.S. 25 has struggled with declining enrollment and low demand by students and families, despite increasing test scores over the last three years, and multiple prior interventions, such as programmatic changes at the school, recruitment and re-branding support, and school re-design.

During the 2014-2015 school year, P.S. 25 served 164 students in grades K-5. In the current 2017-2018 school year, P.S. 25 is serving a total of just 94 students in grades K-5, which represents a 43% decline in enrollment in the past three years. Additionally, only 26% of kindergarten applicants ranked P.S. 25 first, well below the district median of 40%, and only 8% of kindergarten students residing in the P.S. 25 zone chose to enroll in P.S. 25 for kindergarten in the 2017-2018 school year.

The details of this proposal have been released in the amended EIS which can be accessed on the NYCDOE's website at: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2017-2018/February282018SchoolProposals>. Copies of the amended EIS are also available in the main office of P.S. 25.

Summary of Comments Received at the Joint Public Hearings

A Joint Public Hearing (JPH) was held regarding this proposal, where interested parties had an opportunity to provide input on the proposal. The JPH was held on February 5, 2018 at K025, where approximately 75 members of the public attended and there were 16 speakers. Individuals present at the meeting included:

- Deputy Chancellor Phil Weinberg;
- Community District 16 Superintendent Rahesha Amon;
- P.S. 25 Principal Anita Coley;
- Community Education Council 16 (CEC 16) President Nequan Mclean;
- Members of P.S. 25's School Leadership Team (SLT);
- Kelly Krag-Arnold and Jamie Dollinger from the NYCDOE's Office of District Planning;
- Brandon Bloomfield from the NYCDOE's Office of Intergovernmental Affairs; and
- Meghan Harkins, Donna Taylor, and Erin Cochran from the NYCDOE's Office of School Design.

The NYCDOE invited SA Bed Stuy 3 to attend this hearing. However, SA Bed Stuy 3 did not attend this hearing or inform NYCDOE that they would not be in attendance.

The following comments and remarks were made at the JPH at K025 on February 5, 2018:

1. Anita Coley, P.S. 25 Principal, expressed the following comment:
 - a. She thanked students, staff, and families for their hard work and support in helping students at P.S. 25 succeed.
2. Nequan Mclean, CEC 16 president, expressed that CEC 16 supports the proposal to close P.S. 25.
3. Diane Watson, an SLT member at P.S. 25, expressed the following comments:
 - a. She said that she does not approve of the proposal because P.S. 25 is a high performing school.
 - b. She said that the NYCDOE should consolidate another school into P.S. 25 instead of proposing the closure of P.S. 25.
4. One student at P.S. 25 expressed the following comments:
 - a. She said that she has learned a lot at P.S. 25.
 - b. She said that the teachers at P.S. 25 are dedicated and have taught her a lot.
5. One student at P.S. 25 expressed that she does not want to school to close.
6. One student expressed the following comments:
 - a. He said that he does not want P.S. 25 to close.
 - b. He said that the teachers have provided a good education and have helped him succeed.
7. One member of the P.S. 25 staff expressed the following comments:
 - a. She said that she was sad to hear that P.S. 25 might close and that she is not in favor of the proposal.
 - b. She said that she was sad and troubled that CEC 16 supports the proposal.
 - c. She said that the staff of P.S. 25 is hardworking and dedicated.
 - d. She said that P.S. 25 offers many activities, programs, and supports for students.

8. One parent of students at P.S. 25 expressed the following comments:
 - a. She said that she does not support the proposal because P.S. 25 has high test scores.
 - b. She said that P.S. 25 has been a supportive learning environment for her children.

9. One parent of students at P.S. 25 expressed the following comments:
 - a. She said that the staff of P.S. 25 have helped her children succeed in school despite their disabilities.
 - b. She said that she does not support the proposal.

10. One commenter expressed the following comments:
 - a. He said that he works in many schools and that he is impressed with the students at P.S. 25 because they are engaged and they enjoy their work.
 - b. He said that he does not support the proposal.
 - c. He said that he believes that it is clear that the parents and staff work together to help students succeed.

11. One parent of students at P.S. 25 expressed the following comments:
 - a. He said that if this proposal is approved, students will now have to travel long distances to get to school, which would put a burden on families.
 - b. He said that there is sufficient space in building K025 to consolidate another elementary school with P.S. 25, instead of closing P.S. 25.
 - c. He said that he does not support the proposal.

12. One parent of students at P.S. 25 expressed the following comments:
 - a. She said that the teachers and staff of P.S. 25 have helped her children succeed.
 - b. She said that she does not support the proposal.

13. One commenter expressed the following comments:
 - a. She said that her mother was a former student at P.S. 25 and that she is supporting the school in order to honor her memory.
 - b. She said that she does not support this proposal due to P.S. 25's high test scores.
 - c. She asked about the timeline of the proposal and the engagement steps that were followed.

14. One commenter expressed the following comments:
 - a. She said that P.S. 25 should not be closed.
 - b. She said that gentrification might be having an impact on education.
 - c. She said that she suggests getting more students to attend P.S. 25 in order to keep the school open.
 - d. She said that she is concerned with safety outside of the P.S. 25 building because of the lack of lighting under the scaffolding outside.

15. One parent of a student at P.S. 25 expressed the following comment:
 - a. He said that he does not support the proposal because P.S. 25 provides opportunities for nearby students.

16. One parent of students at P.S. 25 expressed the following comments:
 - a. She said that another school should be consolidated with P.S. 25 instead of P.S. 25 being closed.
 - b. She said that her children have excelled at P.S. 25 because of the teachers and staff.

17. One commenter expressed the following comments:
- She said that she is a former teacher in a neighboring district and that she does not support the proposal.
 - She said that P.S. 25 should remain open because of its high test scores.
 - She said that if P.S. 25 is closed, there will be a lot of excess space in the K025 building.
 - She asked what will happen to the staff of P.S. 25 if the school is closed.
 - She asked if the statements given at the JPH will be heard by the PEP.
18. One commenter expressed the following comments:
- She said that she is a retired teacher from a neighboring district and that she does not support the proposal.
 - She said that P.S. 25 should be allowed to advertise more in order to increase enrollment.

Summary of Oral Comments Submitted to the NYCDOE

The NYCDOE received zero voicemails through the dedicated phone number for this proposal.

Summary of Written Comments Submitted to the NYCDOE

The NYCDOE received one e-mail through the dedicated email address for this proposal.

19. One commenter expressed the following:
- She said that her children attended P.S. 25 and that the school is very supportive and has helped her children succeed.

The NYCDOE received 68 letters for this proposal.

20. One parent of a student at P.S. 25 expressed the following comments:
- They said that they are in opposition to the closure of P.S. 25 because the school has taught many generations of their family.
 - They said that many teachers at P.S. 25 are talented at their jobs.
 - They said that the closure of P.S. 25 would hurt their family and community because the school has existed in the community for such a long period of time.
21. One commenter expressed the following comments:
- He said that he has worked in education for forty years around the world and that P.S. 25 stands out to him because of the school's high standards.
 - He praised P.S. 25's leadership and teachers.
22. One parent of students at P.S. 25 expressed the following comments:
- She praised the staff of P.S. 25 for welcoming her children with learning disabilities and providing the services her children need.
 - She said that she opposes the closure of P.S. 25.
23. One parent of students at P.S. 25 expressed the following comments:
- She praised the work of the teachers at P.S. 25.
 - She said that P.S. 25 should not close because test scores have improved recently.
 - She said that P.S. 25 offers many clubs and activities for students at the school.

24. One parent of students at P.S. 25 expressed the following comments:
- She said that she opposes the closure of P.S. 25.
 - She praised the welcoming environment created by the staff at P.S. 25.
25. One parent of students at P.S. 25 expressed the following comments:
- She said that she opposes the closure of P.S. 25.
 - She praised the dedication of the teachers at P.S. 25.
26. NYCDOE received 62 form letters that expressed the following comments:
- They said that they do not support the closure of P.S. 25.
 - They said that the closure of P.S. 25 would have a negative effect on all of District 16.
 - They said that small schools work best for students and teachers.
 - They said that P.S. 25 is not underperforming and has been making progress.
 - They said that in 2017, P.S. 25 outperformed District 16, New York City, and New York State averages in both math and ELA state tests.
 - They said that P.S. 25 is the only zoned school in the vicinity.
 - They said that P.S. 25 offers a variety of enrichment programs such as robotics, music, and dance.

Analysis of Issues Raised and Significant Alternatives Proposed

Comments 13(a) and 14(b, d) are not directly related to the proposal and thus do not require a response.

Comment 2 is in favor of the proposal and thus does not require a response.

Comments 5, 6(a), 7(a), 9(b), 10(b), 11(c), 12(b), 14(a), 17(a), 18(a), 22(b), 24(a), 25(a), and 26(a) state their general opposition to the proposal. Additionally, comments 3(a), 8(a), 13(b), 17(b), 23(b), and 26(d, e) question the decision to close P.S. 25 in light of the school's test scores.

There are times when the NYCDOE and members of the community differ in their opinions about specific proposals. As noted above, while the NYCDOE recognizes the praise for P.S. 25 and commends the school community for its hard work and dedication, a number of factors went into consideration when making this difficult decision. P.S. 25 has struggled with declining enrollment and low demand by students and families, despite increasing test scores and multiple prior interventions, such as programmatic changes at the school, recruitment and re-branding support, and school re-design. The NYCDOE commends the good work done by P.S. 25 students and staff, however, the loss of per-pupil funding at under-enrolled schools can result in fewer academic, extra-curricular, and athletic opportunities than schools with robust enrollment and the NYCDOE believes that a well-rounded education demands more resources than such a small school can provide.

During the 2014-2015 school year, P.S. 25 served 164 students in grades K-5. In the current 2017-2018 school year, P.S. 25 is serving a total of just 94 students in grades K-5, which represents a 43% decline in enrollment in the past three years. Additionally, only 26% of kindergarten applicants ranked P.S. 25 first, well below the district median of 40%, and only 8% of kindergarten students residing in the P.S. 25 zone chose to enroll in P.S. 25 for kindergarten in the 2017-2018 school year.

Comments 14(c), and 18(b) state that the NYCDOE should help P.S. 25 increase enrollment instead of closing the school.

As noted above, a number of factors went into consideration when making this decision to close P.S. 25. P.S. 25 has struggled with declining enrollment and low demand by students and families, despite increasing test scores and multiple prior interventions, such as programmatic changes at the school, recruitment and re-branding support, and school re-design.

During the 2014-2015 school year, P.S. 25 served 164 students in grades K-5. In the current 2017-2018 school year, P.S. 25 is serving a total of just 94 students in grades K-5, which represents a 43% decline in enrollment in the past three years. Additionally, only 26% of kindergarten applicants ranked P.S. 25 first, well below the district median of 40%, and only 8% of kindergarten students residing in the P.S. 25 zone chose to enroll in P.S. 25 for kindergarten in the 2017-2018 school year.

Comments 1(a), 4(a, b), 6(b), 7(c, d), 8(b), 9(a), 10(a, c), 12(a), 16(b), 19(a), 20(b), 21(a, b), 21(a, b), 22(a), 23(a, c), 24(b), 25(b), and 26(g) express support for the quality of programs and staff at P.S. 25.

The NYCDOE recognizes the praise for P.S. 25 and commends the principal and staff for their hard work, dedication, and commitment to creating a positive school environment for their students and the community, including students with disabilities. Despite the efforts made at P.S. 25, the NYCDOE has made the difficult decision to propose closure. The NYCDOE will continue to support District 16 families to ensure they have access to high-quality options.

Comments 3(b), 11(b), and 16(a) express that another school should be consolidated into P.S. 25 instead of closing P.S. 25.

The NYCDOE takes a number of factors into consideration when it makes a difficult decision such as proposing a school for closure. Based on the rationale noted above and described in the amended EIS, including P.S. 25's struggle with declining enrollment and low demand for many years, the NYCDOE believes that school closure is the most appropriate option for P.S. 25 and its students at this time, as students will have access to schools with more robust enrollment if this proposal is approved. At P.S. 25, these ongoing challenges have contributed to a loss of per-pupil funding, potentially resulting in fewer academic, extracurricular, and athletic opportunities than schools with robust enrollment.

Comment 15(a) expresses concern about losing P.S. 25 as an elementary school option in the neighborhood and comments 20(a, c) express the importance of P.S. 25 to the neighborhood and community.

The NYCDOE acknowledges the importance of district schools to the community, and decisions such as a school closure are made on a case-by-case basis. The NYCDOE takes a number of factors into consideration when it makes a difficult decision such as proposing a school for closure. Based on the rationale noted above and described in the amended EIS, including P.S. 25's struggle with declining enrollment and low demand for many years, the NYCDOE believes that school closure is the most appropriate option for P.S. 25 and its students at this time.

Comment 11(a) expresses concern about students' travel distance to other schools if this proposal is approved.

While this consolidation may require some P.S. 25 students to travel further to school each day, there may be other students who may be closer to their new school. Transportation for students will continue to be provided according to Chancellor's Regulation A-801. More details on the NYCDOE transportation policy can be found at: <http://www.optnyc.org/resources/A801.pdf>. The closing of P.S. 25 may result in different students being eligible for busing than in past years, in accordance with Chancellor's Regulation A-801, depending where they enroll for school and where they live.

The Office of Pupil Transportation will continue to provide busing to special education students in accordance with State Education Law and Chancellor's Regulation A-801. State Education Law mandates that the City School District provide transportation for certain special education children residing in New York City to and from the school they legally attend. Students designated as Special Education by the Committee on Special Education are exempt from the minimum grade and distance requirement. Special Education students must also fall within the age guidelines stipulated in the most recent Office of Pupil Transportation General Education Transportation Manual. For special education pupils, specialized transportation is provided only to those students who have an Individualized Education Plan (IEP) that mandates this service. Many pupils who receive special education services do not have IEP's that require specialized transportation and these pupils are eligible only for the same services provided to general education pupils. If the child has any medical problems which might affect his or her well-being on the bus, the parent shall inform the escort of the problem and of any action he or she should take in the event that action is required (medical problems might be asthma, heart condition, diabetes, convulsions, etc.). There is no busing for after-school programs.

Comment 13(c) asks about the timeline of the proposal and engagement steps.

For all proposals related to a significant change in school utilization, the NYCDOE offers multiple opportunities for community engagement, including opportunities mandated by the Chancellor's Regulation A-190. This includes: making the proposal available online and in hard copy, providing notice of the Joint Public Hearing and PEP vote, holding a Joint Public Hearing, collecting public comments concerning the proposal, and preparing an analysis of public comment, as well as offering additional opportunities, such as an optional community meeting for each impacted school.

For the current proposal to close P.S. 25, the NYCDOE offered the following information and opportunities for engagement:

- Calls were made to families of P.S. 25 on December 18, 2017 to notify them of the proposed closure and upcoming community meeting.
- Letters notifying P.S. 25 families of this proposed closure and the upcoming community meeting were backpacked home with students on December 18, 2017.
- Superintendent Pate led a community meeting at P.S. 25 on December 19, 2017 to answer questions and concerns from the P.S. 25 community.
- The NYCDOE held a Joint Public Hearing for this proposal on February 5, 2018.
- A dedicated phone line and email address have accepted public comment at any time following the posting of the proposal.

As mentioned, the PEP is scheduled to vote on this proposal, along with several others, at its February 28, 2018 meeting at Murry Bergtraum High School, 411 Pearl Street, New York, NY 10038. The PEP meeting is open to the public, and attendees have an opportunity to provide public comment before the PEP members and Chancellor. The NYCDOE seeks to continuously provide a transparent and accountable environment, and continuously aims to improve trust between the NYCDOE and school communities.

Comment 17(c) asks about space in K025 if the proposal to close P.S. 25 is approved.

If this proposal is approved, K025 will then be under-utilized, meaning it will have more capacity to accommodate additional students. Pursuant to Chancellor's Regulation A-190, the NYCDOE may issue an EIS for the future use of space in K025, if applicable.

Comment 17(d) asks what will happen to the staff of P.S. 25 if the school is closed.

If this proposal is approved, all teachers, administrative, and non-pedagogical staff at P.S. 25 will be excessed after the closure. All excessing would be conducted in accordance with existing labor contracts.

All excessed teachers will be eligible to apply for other City positions and any teachers who do not find a position would be placed in the ATR pool meaning that they will continue to earn their salary while serving as teachers in other City schools.

Students who would otherwise have enrolled in P.S. 25 would instead be enrolled in other elementary schools. Therefore, it is possible those schools might need to hire additional staff. Consequently, this proposal may not result in an overall loss of teaching positions within the citywide system.

Comment 17(e) asks if the statements given at the JPH will be heard by the PEP.

All comments received at the Joint Public Hearing or through the phone line or email address by 6 p.m. on the day before the PEP meeting are addressed by the NYCDOE in this Public Comment Analysis. The Public Comment Analysis is made available to the public after 6 p.m. on the day before the PEP meeting.

Comment 26(b) states that the closure of P.S. 25 would negatively affect all of District 16.

If this proposal is approved, students in District 16 will no longer have the opportunity to enroll in P.S. 25 for elementary school. They will, however, continue to have access to a broad range of elementary school options. This proposal is not expected to otherwise impact the admissions process at other District 16 elementary schools. There will continue to be sufficient kindergarten seats in District 16 to accommodate future students who may have otherwise enrolled in P.S. 25. Schools in District 16 currently have the capacity to serve approximately 6,500 students in grades K-5, while only 3,110 such students are currently enrolled in 2017-2018. This proposal is expected to help reduce the excess of over 3,400 elementary school seats in District 16 and support enrollment at other elementary schools across the district that will enroll future students who may have otherwise attended elementary school at P.S. 25. If the closure of P.S. 25 is approved, District 16 district elementary schools will have the capacity to serve approximately 5,950 students in grades K-5 and will have an excess of about 2,850 elementary school seats.

Comment 26(c) states that small schools such as P.S. 25 are best for students and teachers.

P.S. 25 has experienced consistent decline in enrollment and low demand by students and families. These issues negatively impact the school's ability to serve students and provide robust programming and resources. The NYCDOE strives to ensure that all families have access to high-quality school options that meet their children's needs. The declining student enrollment at P.S. 25 over the past several years indicates that there is a need to provide stronger options for future and current students in the P.S. 25 community.

Comment 26(f) states that P.S. 25 is the only zoned school in the vicinity.

The Office of District Planning and the District 16 Community Superintendent are working with Community Educational Council 16 to develop a rezoning plan for the zone that currently serves P.S. 25. Regardless of whether or not a rezoning plan is in place by the 2018-2019 school year, all students residing in the current P.S. 25 zone applying for kindergarten for the 2018-2019 school year will receive an offer consistent with the standard kindergarten admissions process.

Comment 17(b) states disappointment with CEC 16's endorsement of the proposal.

Community Education Councils are composed of elected volunteer members of the District 16 community. Community Education Council members are free to provide public feedback on proposals such as this one.

Changes Made to the Proposal

On January 26, 2018, this proposal was amended as described in the Summary of Proposal above.

No further changes have been made to this proposal.