



Public Comment Analysis¹

Date: June 26, 2011

Topic: The Revised Proposed Co-location of Girls Preparatory Charter School with East Side Community School in Building M060

Date of Panel Vote: June 27, 2011

Summary of Proposal

On January 21, 2011, the DOE issued an Educational Impact Statement (“EIS”) describing a proposal to relocate Girls Prep middle school grades five through eight to building M060, located at 420-1 East 11th Street, New York, NY 10009 in Community School District 1. In M060, Girls Prep will co-locate with East Side Community School, (01M450, “East Side Community”) an existing District 1 choice secondary school serving grades six through twelve. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias. On March 23, 2011, the Panel for Educational Policy (the “Panel” or “PEP”) approved that proposal.

On May 26, 2011, the DOE published a revised EIS and revised Building Utilization Plan (“BUP”) in response to public comments on this and other proposals. The Building Utilization Plan (“BUP”) for this proposal, as originally published and approved by the Panel, has been revised in the following manner:

- The proposed shared space schedule on pages 11-12 has been adjusted and the DOE has clarified the rationale for the amount of time that each co-located school is allocated in the shared spaces under this proposal;
- Projected enrollments for the schools have been updated to reflect the most current available information and;
- The room allocation charts have been reformatted to make them easier to understand.

The EIS has been revised to reflect the changed BUP, and to reflect the most recently available enrollment projections for the schools to be co-location in M060 next year.

As background to this proposal, on February, 24, 2010, the PEP approved a proposal for Girls Prep to expand the grades served to include middle school grades 6-8 in M188. A lawsuit

¹ This Analysis of Public Comments reflects those public comments received to date. The DOE will continue to accept public comments until Sunday, June 26 at 6 p.m. If any additional comments are received, they will be addressed in an amended analysis

prevented the implementation of this proposal and Girls Prep middle school grades five and six were instead relocated to private space for 2010-2011. The lease on this space expires on June 30, 2011, and the building is slated for demolition.

Building M060 currently houses two schools. In 2009-2010, building M060 had a target capacity of 1,036 students, and a utilization rate of 94% of target capacity. East Side Community currently enrolls 599 students in sixth through twelfth grade. Ross Global Charter School (84M355, "Ross Global"), a DOE-authorized charter school, is also currently co-located in M060, with an enrollment of 396 students in Kindergarten through eighth grade. Thus, total current enrollment in M060 is 995 students, which yields a utilization of 96%. Ross Global's current charter expires on June 30, 2011, and its application for a renewal of its charter beyond that date has been denied. Thus, M060 will become under-utilized starting with the 2011-12 school year. The DOE is proposing to site Girls Prep middle school grades in this newly available District 1 space in order to maintain access to a high quality K-8 school for female students in District 1.

Girls Prep Middle School currently enrolls 124 students in fifth and sixth grades. If this proposal were approved, in 2011-2012, Girls Prep would enroll approximately 190-200 fifth through seventh graders in M060. The school will expand by one additional grade in 2012-2013. At full scale, the fifth through eighth grades of Girls Prep would enroll 280-300 students in M060, resulting in total building enrollment of approximately 850-940 students and building utilization of 82-91% of target capacity.

The details of this proposal have been released in a revised Educational Impact Statement which can be accessed here along with the revised Building Utilization Plan ("BUP"):
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/June2011Proposals>.
Copies of the revised EIS and BUP are also available in the main offices of East Side Community High School and Girls Prep Middle School.

Summary of Comments Received at the Joint Public Hearings

Two joint public hearings were held regarding the original proposal, one at East Side Community School on February 28 and one at Girls Preparatory Charter School on March 7. At the hearings, interested parties had an opportunity to provide input on the proposal.

On February 28, approximately 40 members of the public attended the hearing and 18 people spoke. Present at the meeting were: Manhattan High School Superintendent Elaine Gorman; Girls Prep Middle Grades Acting Principal Ian Rowe, Lower Grades Principal Anne Lackritz, and Managing Director of Finance and Operations Christina Garcia-Coleman; East Side Community Assistant Principal Tom Mullen; Community Education Council ("CEC") 1 representatives Lisa Donlan, Latrina Miley, Edward Primus, Andrew Reicher, Doug Stern, and Daniel Becker; and New York City Councilmember Rosie Mendez.

On March 7, approximately 20 members of the public attended the hearing and nine people spoke. Present at the meeting were: District 1 Community School Superintendent Daniella Phillips; Girls Prep Middle Grades Acting Principal Ian Rowe, Lower Grades Principal Anne Lackritz, and Managing Director of Finance and Operations Christina Garcia-Coleman;

Community Education Council (“CEC”) 1 representatives Lisa Donlan, Latrina Miley, Andrew Reicher, Doug Stern, and Daniel Becker.

Two additional joint public hearings were held regarding the revised proposal, one at East Side Community High School on June 13 and another at Girls Prep Elementary School on June 21. At the hearings, interested parties had an opportunity to provide input on the proposal.

On June 13, approximately 4 members of the public attended the hearing, none of whom spoke. Present at the meeting were: Manhattan High School Superintendent Elaine Gorman, Tiffany Liston representing Girls Prep Middle School, Principal Mark Federman representing East Side Community High School, CEC 1 representative Lisa Donlan, and Thomas Franta representing the SUNY Charter Schools Institute.

On June 21, no members of the public attended the hearing. Present at the hearing were: Community District 1 Superintendent Daniella Phillips, Ian Rowe representing Girls Prep, and Andrew Reicher representing CEC 1.

This revised Public Comment Analysis includes those statements made at the hearing on June 13, 2011 and will be made publicly available prior to the Panel for Educational Policy’s vote on this revised proposal.

The following comments and remarks were made at the joint public hearings on February 28, 2011, and March 7, 2011, on the original proposal:

1. CEC 1 President Lisa Donlan spoke at the hearing:
 - a. She stated that the proposal is acceptable on its face, given that Girls Prep is already expanding and Ross Global Academy will be leaving building M060.
 - b. She expressed the opinion that the DOE fails to plan for growth of schools and its capacity and utilization formulas do not provide adequate space for enrichment, support, and intervention services for all students.
 - c. She noted that no other school in District 1 has requested space, and Girls Prep has been “in line” for new space.
 - d. She asserted that Girls Prep got a C on its last report card, which was really an F, and it is ranked in the bottom 15th percentile [of all schools].
 - e. She asserted that Girls Prep and charter schools in general do not serve a proportional amount of highest needs students, including Special Education and English Language Learner populations.
 - f. She expressed the opinion that it is troubling the DOE gives public space to schools not serving highest needs students and not outperforming DOE schools.
 - g. She expressed the opinion that charter schools are based on business plans that are crafted according to the interests of the wealthy, and these plans are not easily accessible by the general public.
2. CEC 1 representatives Lisa Donlan and Latrina Miley expressed the opinions that:
 - a. Charter schools lack transparency, oversight, and meaningful parental involvement, which is detrimental to education.

- b. Charter schools across the nation are plagued by negative issues that harm their students, and a study shows charter schools do not outperform district schools.
 - c. The Building Utilization Plan attached to the proposal is arbitrary and was created in a vacuum. The CEC hopes the schools will form their own fair plan for both shared space and classroom allocation in cooperation with each other and create a meaningful synergy in their relationship.
3. CEC 1 representatives Daniel Becker and Andrew Reicher said diversity is meaningful to the CEC, so they want to know about the demographics of Girls Prep. They asked:
- a. What are the demographics of the school compared to District 1?
 - b. What percentage of Girls Prep students are from District 1?
 - c. What efforts are made to recruit within District 1?
 - d. What percentage of Girls Prep students are English Language Learners?
 - e. What efforts are made to recruit English Language Learners?
 - f. What services are offered to English Language Learners?
 - g. What percentage of Girls Prep students are Special Education students?
 - h. What percentage are LRE [Least Restrictive Environment] versus MRE [More Restrictive Environment, SC [Self-Contained Special Class] versus CTT [Collaborative Team Teaching] versus SETSS [Special Education Teacher Support Services]?
 - i. What efforts are made to recruit Special Education students?
 - j. What services are offered to Special Education students in each of the Special Education categories just listed?
 - k. What percentage of Girls Prep Students are housed in temporary housing or homeless shelters?
 - l. What efforts are made to recruit students who live in temporary housing or homeless shelters?
 - m. What services are offered to students in temporary housing and homeless shelters?
 - n. What percentage of Girls Prep students receive free or reduced lunch?
 - o. What efforts are made in District 1 to recruit and serve students receiving free or reduced lunch?
 - p. What is the ethnic/racial and academic level of students served at Girls Prep?
 - q. How all of these facts could be verified?
 - r. If parents, teachers, or students are unhappy with a decision or the outcome [at a charter school] what channels can they use to register their opinion or try to affect change?
 - s. Does Girls Prep have a School Leadership Team as other schools in District 1 do? How would this be addressed?
4. CEC 1 representatives Doug Stern and Daniel Becker asked several questions about parental involvement at Girls Prep, asserting that meaningful parental involvement creates benefits to students and education comparable to \$1000 per child per year in spending:
- a. How does Girls Prep engage parents?
 - b. Are parents on the Board of Directors?
 - c. Are board meetings made public, and are parents notified in advance of the meetings?

- d. Are the board meetings easily accessible by parents?
 - e. Are board meeting minutes made public and sent to parents?
 - f. What role does the Parents Association play in setting agendas and making decisions about educational goals and priorities?
 - g. What role does parent input play in programming and hiring or firing decisions?
 - h. Relating to transparency and accountability, how does Girls Prep collect, report and verify data such as academic results, attrition and turnover rates, financial spending, and et cetera?
5. Girls Prep Director of Finance and Operations Christina Garcia-Coleman said Girls Prep has posted impressive academic results and wants to expand so the children currently at the school can continue to be served by Girls Prep. She asserted that a tremendous amount of time and energy have been spent to serve these purposes. Additionally, Girls Prep is eager to foster a working relationship with East Side Community which can serve as an example Citywide for how charter schools and DOE schools can create a positive partnership. She said Girls Prep students are public school students because Girls Prep is a public school, and the students therefore should be served in public space.
 6. East Side Community Assistant Principal Tom Mullen said his school is looking forward to being co-located with Girls Prep, and they seek to foster a positive relationship in contrast to the current negative relationship caused by the actions and attitudes of the school East Side Community is currently co-located with, Ross Global Academy. He expressed the opinion that Ross Global has operated with an attitude of arrogance, pushing his school around and not respecting that his school is one of the top schools in the City. He said they had started construction in the building without consultation with his school, and they consequently threw out thousands of dollars worth of East Side Community's equipment and materials. Also, he said, the leadership of Ross Global Academy stopped communicating with his school, referring any attempt to communicate to the charter school's board of directors. He said his interactions with Girls Prep to date have been positive, and he is optimistic about working with Girls Prep to share the building fairly.
 7. A commenter said she believes in the school [Girls Prep], and it serves her daughters well, giving them an excellent education. She also said she looks forward to a positive relationship with East Side Community.
 8. A commenter said she supports the proposal because Girls Prep has given her family access to excellent education, and she believes that she and other District 1 parents deserve this type of education.
 9. A commenter said her child suffers from learning disabilities, but Girls Prep has worked extensively with her daughter to overcome the disabilities and become a successful student, which is why she supports the proposal.
 10. A commenter said Girls Prep has helped her daughter do well in school despite her daughter initially not knowing much English. She said the principal of Girls Prep, Anne Lackritz, does a good job.
 11. CEC representative Latrina Miley said her daughter used to attend Girls Prep and asserted that the school mismanaged her daughter's learning disabilities. She said the school once called 911 while her daughter was in a tantrum, though her daughter was only in kindergarten at the time. She said she has no respect for Girls Prep, and the DOE

school her daughter is in now has served her daughter well, bringing her test grades up from 1s and 2s to 3s and 4s.

12. Multiple commenters said they have had a positive experience with Girls Prep and they love the school, which has helped them or their children to do very well academically.
13. A commenter said that not every school is right for every family, but Girls Prep has served her family well.
14. A commenter said Girls Prep has grown in its ability to serve students since the time that CEC representative Miley's child was at the school.
15. A commenter asked where people will be able to access the answers to the questions posed by the CEC.
16. CEC President Lisa Donlan said the CEC wants there to be transparency on behalf of Girls Prep, and she invites the families of Girls Prep to be involved in the District's community, participating in the CEC's meetings and other activities.
17. A commenter said his school, East Village Community School, located in building M061 at 610 East 12th Street in Manhattan's District 1, is requesting that her school or one of the two other schools co-located in M061 be reconsidered for the re-siting in building M060. He said if they will not be reconsidered, they alternatively ask that a revision is made to the proposal to say that if the structural integrity of building M061 is compromised by a faulty foundation and possible existence of oil contamination under the school, East Village Community will be moved into building M060 instead of Girls Prep. He said that his school has already petitioned to move into building M060 because of overcrowding in their current location. He explained that the basis for this request is the possibility that instructional programming will be seriously threatened by the possible structural problems with and resulting repairs to their current building.

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

18. The Principal of East Village Community School, wrote to say she is requesting that her school or one of the two other schools co-located in M061 be reconsidered for the re-siting in building M060. She said if they will not be reconsidered, they alternatively ask that a revision is made to the proposal to say that if the structural integrity of building M061 is compromised by a faulty foundation and possible existence of oil contamination under the school, East Village Community will be moved into building M060 instead of Girls Prep. She wrote that her school has already petitioned to move into building M060 because of overcrowding in their current location. She explained that the basis for this request is the possibility that instructional programming will be seriously threatened by the possible structural problems with and resulting repairs to their current building.
19. A commenter said a charter school should not be put in a building where there are already schools operating. Instead, the existing schools should expand to offer new programs. The commenter expressed the opinion that hiring an entire, separate staff is a waste of money and resources, and asserted that instead of a charter school opening, if the principals and staff of the existing schools cannot handle the additional programs, someone should be hired to run them.

The following comments and remarks were made at the joint public hearing on June 13, 2011, on the revised proposal:

20. CEC 1 President Lisa Donlan spoke at the hearing:
 - a. She said the CEC is in complete support of the co-location proposal which she described as a model co-location proposal borne out of collaboration among multiple parties.
 - b. She said this co-location proposal should not be a part of the lawsuit brought against some of the DOE's school co-location and phase-out proposals.
 - c. She thanked the SUNY CSI for sending a representative, noting the importance of their involvement in hearings related to SUNY-authorized charter schools.
 - d. She noted that while in the past BUPs have not always seemed pedagogically sound, she is very pleased with the revised BUP.
21. Girls Prep representative Tiffany Liston spoke at the hearing:
 - a. She expressed appreciation for Lisa Donlan's statement.
 - b. She expressed her feeling that families deserve to send their kids to school in public school space and she thanked Girls Prep families for fighting for their children.
 - c. She said that Girls Prep's relationship with Principal Federman had only strengthened since the Panel for Educational Policy's March 28 vote.
 - d. She said that Girls Prep is eager to work with East Side Community in any way possible to make sure their co-location serves as a model for district-charter partnerships.
22. East Side Community Principal Mark Federman spoke at the hearing:
 - a. He said that he has been waiting for 18 years to share the building with a partner that shares similar values and spoke of his belief that Girls Prep will be an incredible partner.
 - b. He thanked Lisa Donlan and Ian Rowe of Girls Prep for the work they have done.
 - c. He stated that the proposal is not just worth approving, but worth celebrating as well.

The following comments and remarks were made at the joint public hearing on June 13, 2011, on the revised proposal:

23. CEC 1 representative Andrew Reicher said he was glad the issue would be resolved on June 27th so the community can turn its focus to providing a great education to students in District 1.
24. Girls Prep representative Ian Rowe thanked Girls Prep families for their support and expressed excitement that Girls Prep could soon serve public school students in a public school building. He also expressed excitement about a partnership with East Side Community High School and said Girls Prep had already been talking with East Side Community about ways in which they could make their co-location mutually beneficial. Mr. Rowe said he hopes they can demonstrate that co-located charter and district schools can enjoy an empowering relationship.

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

Comments 1(a), 1(c), 5, 6, 7, 8, 9, 10, 12, 13, 14, 20, 21 and 22 are in favor of the proposal and do not require a response.

Comments 1(b) and 2(c) relate to the process by which the DOE allocates space to schools.

The DOE seeks to fully utilize all its building capacity to serve students. The Instructional Footprint is the guide used to allocate space to all schools based on the number of class sections they program and the grade levels of the school. The number of class sections at each school is determined by the Principal based on enrollment, budget, and student needs; there is a standard guideline of target class size (i.e., number of students per class section) for each grade level. At the middle school and high school levels, the Footprint assumes every classroom is programmed during every period of the school day except one lunch period. The full text of the Instructional Footprint is available at http://schools.nyc.gov/NR/rdonlyres/8CF30F41-DE25-4C30-92DE-731949919FC3/87633/NYCDOE_Instructional_Footprint_Final9210TNT.pdf.

In the case of a charter co-location, the Building Utilization Plan (“BUP”) attached to the EIS details the number of class sections each school is expected to program each year and allocates the number of classrooms accordingly. The assignment of specific rooms to the schools in the building will be made in consultation with the Principals of each school and the Office of Space Planning if this proposal is approved. The BUP demonstrates that there is sufficient space in the building to accommodate the proposed co-location.

The shared space schedule listed in the revised BUP is only a proposal. The Building Council, made up of the principals of both co-located schools, is free to deviate from the proposed revised Shared Space Plan to accommodate specific programmatic needs of all special populations or groups within each school, provided that the Building Council comes to an agreement of the final Shared Space Plan collaboratively.

The DOE verified the amount of space available in the building through a walkthrough performed by Richard Bocchicchio, Manhattan Director of Space Planning. The DOE believes that the walkthrough properly identified the available space in the building.

Comments 1(d) and 2(b) concern the performance of charter schools generally and/or Girls Prep specifically.

In 2010, Girls Prep students scored in the top 22% of all schools city-wide on the State ELA test and in the top 10% of all schools city-wide on the State math test. Among District 1 schools, Girls Prep scores were third highest on both the ELA and math tests.² The only schools scoring

² 2009-2010 Division of Performance and Accountability.

higher than Girls Prep were a city-wide gifted and talented school (NEST+M, 01M539), and P.S. 184 Shuang Wen (01M184).

In spite of these strong test scores, Girls Prep received a “C” on the 2009-2010 Progress Report. It received an “A” on the school environment, a “B” on Performance, and an “F” on Progress, reflecting a relative drop from the very high test scores achieved the prior year, and the relative progress its students made from 2008-2009 to 2009-2010.

Girls Prep’s record of academic performance has led the DOE to make this co-location proposal in order to preserve a strong option for parents of female students in District 1.

Comments 1(e) and 1(f) claim that public charter schools generally and/or Girls Prep specifically do not serve students with special needs.

Under recent amendments to state law, public charter schools must 1) serve all students who are admitted through their lotteries, and 2) serve a percentage of Special Education and English Language Learners comparable to the district average. Charter schools that fail to meet the special education and/or ELL targets set by their authorizer risk being closed or having their renewal applications rejected. The actual number of students with IEPs and ELL students served by Girls Prep is discussed below.

Comments 1(g) and 2(a) claim that charter schools have business plans which cater to the wealthy and are not easily accessible by the general public, and that charter schools are otherwise insufficiently transparent.

Under the most recent amendment to the state Charter Law, for-profit entities may not operate or manage new charter schools in New York. The Charter Law also specifies the information which must be included in a charter school’s application, which includes information on estimated budgets and other business issues.

Charter schools are considered public agencies for purposes of the Open Meetings Law and the Freedom of Information Law (FOIL). Under FOIL, schools are required to adopt procedures by which interested citizens may review school records, including public school charters. Therefore, a member of the public can file a FOIL request to view charter school records. Moreover, the Charter Law requires charter schools to post online an annual report which contains much of the data cited in this document.

Comments 3(a)-3(q) ask for demographic information about Girls Prep students.

3(a): Demographics of the school compared to District 1

Ethnicity	Girls Prep (grades K-6)	District 1
American Indian or Alaska Native	0%	1%
Black or African-American	39%	17%
Hispanic or Latino	36%	47%

Asian or Native Hawaiian/Other Pacific Islander	2%	20%
White	1%	16%
Multiracial	21%	0%
Refused	1%	0%

3(b): 48% of Girls Prep students (grades K-6) are District 1 residents. However, beginning in 2009, Girls Prep gives absolute preference to District 1 students, and District 1 residents therefore make up 75% of the Kindergarten class. Given this absolute preference to District 1 residents, future classes will likely have a similar percentage of District 1 students.

3(c): Girls Prep uses postcards to recruit District 1 families.³ In 2011, postcards were mailed to 6,546 District 1 families. The school also completed presentations at D1 head start programs, nursery schools, after-school programs, and daycares. Girls Prep writes letters to local D1 church leaders including information about the school as well as a bilingual flyer (Spanish/English and Chinese/English). These fliers are then handed out at all D1 NYCHA housing developments as well as local stores, banks, Laundromats, hair salons and barbershops, pizza parlors, and take-out restaurants. In 2011, Girls Prep handed out fliers at 12 housing developments, 11,424 apartments, and more than 45 local businesses found within 1.26 miles of the school.

3(d),(e) & (f): 5% of Girls Prep students are English Language Learners, compared to 10% for D1. As discussed above, under recent amendments to state law, public charter schools must serve a percentage of Special Education and English Language Learners comparable to the district average. Charter schools that fail to meet the special education and/or ELL targets set by their authorizer risk being closed or having their renewal applications rejected.

All marketing and recruitment materials, as well as the lottery application, are printed in English, Spanish and Chinese. At events, Girls Prep has a bilingual speaker on hand to aid in translation. Recruitment materials and events emphasize that the school is inclusive and provides full services for ELLs. The school canvases in neighborhoods that are predominantly Spanish and Chinese speaking.

Services for ELL students include guided reading in a small group setting. ELL students who qualify for Supplemental Academic Services receive reading support for phonemic awareness, fluency, vocabulary and comprehension.

3(g), (h), (i), and (j): 11% of Girls Prep students have IEPs; 2% receive related services only; 4% receive SETSS; and 5% are in CTT classes. For all District 1 students, 22 % have IEPs; 6% are in Self Contained classes; 7% in CTT classes; and 5% receive SETSS. As discussed above, under recent amendments to state law, public charter schools must serve a percentage of Special Education and English Language Learners comparable to the district average. Charter schools that fail to meet the special education and/or ELL targets set by their authorizer risk being closed or having their renewal applications rejected.

³ All data given for 2011 recruitment season.

All students with disabilities are educated alongside their nondisabled peers for the majority of their school day (LRE). There are no MRE Self Contained special education classes. In 2010-2011, there is one CTT class per grade in grades 2, 4, 5, and 6. In 2011-2012, the school plans to offer automatic CTT classes in Kindergarten and 1st grade. For grades 2-7, the school will offer CTT classes and/or special education certified learning specialists based on the number of students requiring special education services, as well as the hours per day these students require the services. SETSS are provided for up to 10 periods per week based on student need. Speech and language therapy and counseling are provided. Occupational therapy and physical therapy are both provided on-site and are contracted through a related service agency.

All marketing and recruitment materials and events emphasize that the school is inclusive, with services for students with IEPs. The school also reaches out to head-start programs that cater to special education students.

3(k), (l), and (m): 0.3% of Girls Prep students live in homeless shelters and 0.5% live doubled up. Girls Prep visits homeless shelters throughout District 1 to distribute applications and recruitment/ marketing materials. The school communicates with parents, homeless shelters and the Office of Pupil Transportation when bussing is needed to travel to school. Other services are provided as needed.

3(n) and (o): 73% of Girls Prep students receive free or reduced price lunch, compared to 65% of students in all of District 1. In terms of recruitment, presentations are scheduled at head start programs in high-needs neighborhoods. Girls Prep writes letters and reaches out to local D1 church leaders and canvases extensively at NYCHA developments and homeless shelters.

3(p): Data for students who took the NYS ELA and Math exams and were enrolled at Girls Prep in 2009-2010 can be found below.

Math Results

Ethnicity	Level 1	Level 2	Level 3	Level 4
African-American	0	10	24	13
Hispanic	0	6	24	7
Caucasian	0	1	1	1
Asian	0	0	0	1
Multiracial	0	1	13	8

ELA Results

Ethnicity	Level 1	Level 2	Level 3	Level 4
African-American	1	21	21	4
Hispanic	0	18	16	3
Caucasian	0	0	3	2
Asian	0	1	0	0
Multiracial	0	3	14	5

Comment 3(q) asks how the above data could be verified.

Under the most recent amendment to the charter law, charter schools are required to post online an annual report which contains much of the data above, along with student performance and recruitment information. This annual report is also provided to the school's authorizer, which has oversight authority over the school.

Comment 3(r) asks how parents, teachers and students can affect change and register complaints.

Complaints that are not violations of law or charter are considered to be informal. Parents with informal complaints can bring them directly to the attention of a teacher, the Assistant Principal, the Director of Student and Family Affairs, or the PTA President. Parents can then bring complaints to the Principal.

Formal complaints regarding alleged violations of law or charter must be made in writing and submitted to the Board of Trustees. The Board of Trustees will then contact the Principal to address the problem. If a satisfactory solution is not reached, an appeal should be made to the school's authorizer.

Comment 3(s) asks about the School Leadership Team at Girls Prep.

Girls Prep's School Leadership Team is made up of the Principal, the Director of Student and Family Affairs, the Instructional Coach, and Lead Mentor Teacher. In addition, the School Leadership Team is supported by the CEO and Managing Director, Finance and Operations of Public Prep – the school's charter management organization.

Comment 2(a) and 4(h) concern transparency at Girls Prep and charter schools in general.

Girls Prep collects academic results through interim assessments created by the school's instructional leadership team, through State testing at the end of the year (Grades 3 and up), and through a nationally norm-referenced test called the Terra Nova (all grades). Results on the State tests are verified by the State, and results on the Terra Nova are verified by McGraw Hill, which scores the exam. Results from State exams and Terra Nova exams are reported annually to SUNY's Charter Schools Institute and to the State in the form of an Accountability/Annual Report. The report is posted on SUNY's website and will be posted on the school's website beginning in June 2011.

Attrition/Turnover is monitored in the school's student information system and reported monthly in the school's internal Dashboard. Student enrollment is also reported and verified in the bi-monthly Per Pupil submitted to the NYDOE.

Girls Prep tracks its financial spending in Quickbooks. Girls Prep is audited annually by an independent accounting firm and by the State and files a Form 990 annually.

Comments 4(a)-4(g) ask about parent involvement in Girls Prep and claim there is a lack of parent involvement in charter schools in general.

4(a): Parent involvement at Girls Prep includes:

- Principal greets each student and her family at the entrance of the school each morning. Families are welcome to communicate questions, comments or concerns. Principal is committed to respond to all communication within 36 hours.
- Daily homework/communication log allows parents to write a note to the teacher and vice versa. A family member signs the sheet each night affirming that the student has been read to or read independently.
- Each week the school sends home a weekly newsletter called The Blossom.
- At least once per month classroom teachers reach out to families to speak about progress or concerns.
- Each month every grade at the school hosts a family event where the students are able to showcase their work or talents to family.
- Director of Student and Family Affairs serves as a liaison between home and school.

4(b): The senior officer of the PTA serves a one-year term on the Board of Directors each academic year.

4(c)&(d): All school board meetings are public and notification is provided at least one week in advance, as required by law. Dates are posted in the school's main office and on the website.

4(e): Board minutes are public information but are not sent to parents.

4(f): The Principal and Director of Student and Family Affairs meet with the executive committee of the PTA on a monthly basis. In addition, Girls Prep uses information from family surveys performed twice each year to examine and set new educational goals and priorities.

4(g): Programming decisions are made primarily based on student achievement and results, and firing/hiring decisions are made primarily based on performance evaluations.

Comment 11 deals with a CEC member's daughter who attended Girls Prep. Although the DOE does not have information regarding the specific student or incident cited in the comment, Girls Prep's record of academic performance has led the DOE to make this co-location proposal in order to preserve a strong option for parents of female students in District 1.

Comment 15 asks where people will be able to access answers to the CEC's questions. This document is designed to respond to all relevant comments, and was made publicly available prior to the Panel for Educational Policy's vote on the original proposal. The revised Public Comment Analysis includes those statements made at the hearings on June 13 and June 21, 2011 and will be made publicly available prior to the Panel for Educational Policy's June 27, 2011 vote on this revised proposal.

Comment 16 is an invitation for Girls Prep families to get involved in the District 1 CEC and does not require a response.

Comments 17 and 18 concern the possible existence of oil contamination under building M061.

Based on a complaint of petroleum-like odors identified during a geotechnical investigation in the school auditorium at M061, the DOE had AKRF Engineering, P.C., conduct an inspection on March 2, 2011. Based on the inspection results, AKRF concluded that there was no oil under the ground and no conditions that would present an indoor air quality concern.

The School Construction Authority will perform repairs on a portion of the foundation of the M061 auditorium, but these repairs are not expected to substantially impact instructional programming at the school.

Comment 19 asserts that instead of allowing a charter school to move into Building M060, the schools currently in the building should be allowed to expand.

East Side Community intentionally limits its enrollment to 85-95 students per grade in high school and does not wish to expand beyond this size.

Changes Made to the Proposal

On May 26, 2011, the DOE revised this proposal in response to public comments to this and other proposals. The DOE has published a revised EIS and BUP. The revised BUP makes the following changes:

- The proposed shared space schedule on pages 8-9 has been revised and the DOE has clarified the rationale for the amount of time that each co-located school is allocated in the shared spaces under this proposal.
- Projected enrollments for the schools have been updated to reflect the most current available information.

The EIS was revised to reflect the changes to the BUP and to reflect the most recently available enrollment projections for the schools to be co-location in M060 next year.