

## **Public Comment Analysis**

Date: October 29, 2013

Topic: The Proposed Co-location of Achievement First North Brooklyn Preparatory Charter School with Existing School P.S. 299 Thomas Warren Field (32K299) in Building K299 Beginning in 2015-2016

Date of Panel Vote: October 30, 2013

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### **Summary of Proposal**

The New York City Department of Education (“DOE”) is proposing to site grades five through eight of Achievement First North Brooklyn Preparatory Charter School (84KTBD, “AF North Brooklyn Preparatory”) in building K299 (“K299”), beginning in the 2015-2016 school year. K299 is located at 88 Woodbine Street, Brooklyn, New York, 11221, in Community School District 32. If this proposal is approved, AF North Brooklyn Preparatory will be co-located with P.S. 299 Thomas Warren Field (32K299, “P.S. 299”); an existing zoned K-5 school in building K299. P.S. 299 also offers two sections of a full-day pre-kindergarten program. Beginning in the 2015-2016 school year, AF North Brooklyn Preparatory will begin to phase in and serve fifth grade students, and will add one grade level each year until it reaches full scale serving fifth through eighth grade students in K299 by the 2018-2019 school year.

In October 2012, AF North Brooklyn Preparatory charter was authorized by the State University of New York Trustees (“SUNY”) to serve students in kindergarten through eighth grade. AF North Brooklyn Preparatory will be managed by Achievement First Schools (“Achievement First”), a Charter Management Organization (“CMO”). On June 19, 2013 a proposal was approved to co-locate AF North Brooklyn Preparatory’s kindergarten through fourth grades in building K377 located in District 32.

Under this proposal, AF North Brooklyn Preparatory will begin enrolling fifth grade students in K299 for the 2015-2016 school year, continuing to add one grade each year until it serves students in fifth through eighth grades in 2018-2019. At that point, it will serve its elementary school grades (K-4) in building K377 and its middle school grades (5-8) in building K299.

P.S. 299 is an existing zoned elementary school that currently serves students in kindergarten through fifth grade and offers two sections of a full-day pre-kindergarten program. P.S. 299 provides admissions preference to students residing in the K299 zone. This proposal will not

impact P.S. 299's ability to offer pre-kindergarten.

According to the 2011-2012 Enrollment, Capacity, Utilization Report (the "Blue Book"), K299 has the capacity to serve 618 students. If this proposal is approved, K299 is projected to serve approximately 406-481 students from AF North Brooklyn Preparatory and P.S. 299 during the 2015-2016 phase-in year, yielding an estimated building utilization rate of 66%-78%. At full scale in 2018-2019, K299 will serve approximately 646-766 students from AF North Brooklyn Preparatory and P.S. 299, yielding an estimated building utilization rate of 105%-124%. As detailed in the attached Building Utilization Plan ("BUP"), all schools will receive space that meets their instructions needs, and the building has space to accommodate P.S. 299 and AF North Brooklyn Preparatory.

### **Summary of Comments Received at the Joint Public Hearings**

A joint public hearing regarding the proposal was held at P.S 299 on October 23, 2013. At this hearing, interested parties had an opportunity to provide input on the proposal. Approximately 173 members of the public attended the hearing, and 53 people signed up to speak. Present at the meeting were District 32 Community Superintendent Lillian Druck, who served as the Chancellor's Designee; District 32 Community Education Council ("CEC 32") President Victorina Lugo; District 32 CEC members Fletta Stocks and Elaine Rogers-Cruz; P.S. 299 School Leadership Team ("SLT") representative DeNeil Campbell; Principal Wilma Kirk of P.S. 299; Maureen Murphy of SUNY; and Lily Haskins and Timothy Castanza from the DOE.

The following comments and remarks were made at the joint public hearing on October 23, 2013 on the proposal:

1. A member of the CEC commented that:
  - a) The building utilization is wrong.
  - b) The proposal will cause overcrowding in K299.
  - c) The proposal takes away space and programming from the current school.
  
2. A member of the CEC commented that:
  - a) They have an issue with co-locations.
  - b) Co-locations limit time for students in shared spaces.
  - c) Students with special needs require specific rooms and space.
  - d) The auditorium at K299 is currently used for music programming and that should not change.
  - e) They have strong concerns about middle school aged children being co-located in the same building as elementary school aged children.

f) The proposal causes a safety concern for the students who are in the building already and crowding in the stairwells will be a safety concern.

3. A member of the CEC commented that:

- a) The building is not built to hold middle school students in regards to specific spaces such as bathrooms.
- b) The building lacks enough space for P.S. 299.
- c) P.S. 299 utilizes all of the space it currently has.
- d) If P.S. 299 wants a middle school co-location it should be able to expand to serve 6-8<sup>th</sup> grade itself.

4. A member of the SLT commented that:

- a) The proposal will cause the current school to follow the rules and orders established by Achievement First North Brooklyn Preparatory.
- b) A deal has been made between the DOE and Achievement First at the expense of the children at P.S. 299.
- c) It is not fair that P.S. 299 will be displaced in their own building while Achievement First will be granted space.
- d) The proposal presumes that P.S. 299 is not an adequate school that does not provide a quality education.

5. A member of a community based organization commented that:

- a) The proposal should not be approved because this is the end of the Bloomberg administration and this co-location represents the policies of an outgoing mayor.

6. City Council Member- elect Antonio Reynoso commented that:

- a) He is excited about P.S. 299 being one of the better performing schools in Bushwick.
- b) He thinks it is a disgrace that the DOE wants to disrupt the progress at P.S. 299 with this proposal.
- c) He thinks that instead of this proposal, the DOE should provide P.S. 299 with additional resources and support.
- d) The proposal is being forced upon the community, especially because it involves a charter school.
- e) The people are tired of Mayor Bloomberg.
- f) The mayor's term ends in 2013 and he should leave anything beyond then to the next mayor to decide upon.
- g) No matter what is said tonight, the DOE will not listen to the members of the community here.

- h) It is important to be on record so that the new mayor will know your concerns and overturn this proposal.
  - i) We need quality schools, not quality schools interrupting other schools.
  - j) I welcome a process where the DOE asks parents what they want before moving ahead with a proposal.
7. A representative from City Council Member Diana Reyna's office commented that:
- a) The DOE has not worked hard to be an active member of the community.
  - b) The proposal shows that the DOE does not put children first.
  - c) P.S. 299 is not the only school on the chopping block and that the community should fight the DOE.
8. Principal Wilma Kirk commented that:
- a) She has been principal of the school for 7 years and has seen much growth amongst the school community.
  - b) Good things will continue to happen at P.S. 299.
9. Multiple commenters commented that they oppose the co-location of a charter school in building K299.
10. Multiple commenters stated:
- a) They support the current staff and principal at P.S. 299.
  - b) The current school is high performing.
  - c) The school has been a community school and should remain a community school.
11. Multiple commenters stated:
- a) They support the proposal.
  - b) Achievement First provides strong options in the Bushwick community.
  - c) The proposal provides parents with a choice for their child's education.
12. Multiple commenters stated that the co-location of a middle school with an elementary school provides safety concerns for the elementary school students currently in the building.
13. Multiple commenters stated that they are concerned that the proposal will put the elementary school students currently in the building at risk of bullying.
14. One commenter stated that the proposal causes concern over the safety of students in the case of a fire.

15. Multiple commenters stated that the proposed co-location causes safety concerns in regards to entering the building in the morning and exiting at dismissal.
16. One commenter stated that:
- a) The pre-k program at P.S. 299 is filled to capacity and had to turn away applicants for the 2013-2014 school year.
  - b) The principal requested to expand the pre-K program, but cannot as a result of the proposal.
17. One commenter commented that the DOE should provide additional academic intervention programs and laptops to current students instead of funding the proposed charter school.
18. Multiple commenters stated that the building is not structurally built to serve middle school students.
19. Multiple commenters stated about the process by which space is allocated to schools and shares space scheduling.
20. One commenter stated that the co-location proposal prevents the expansion of programming at P.S. 299.

**The DOE received comments at the Joint Public Hearing which did not directly relate to the proposal and therefore, will not be addressed.**

21. A representative from a community based organization commented that if elected, Bill deBlasio will fight to make sure that parents are included in any co-location decision.
22. One commenter expressed that middle school students are inappropriate at times.

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

No written or oral comments were submitted to the DOE regarding this proposal.

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

Comments 5(a), 6(e, h), 7(a), 21 and 22 are not directly related to the proposal and thus do not require a response.

Comments 4(d), 6(a), 8(a-b) and 10(a-c) express support for P.S. 299.

The DOE acknowledges the gains and achievements of P.S. 299. The DOE believes that this proposal will not prevent P.S. 299 from continuing to provide the supports needed for the success of the school community and will continue to support P.S. 299 moving forward.

Comments 2(a), 4(b-c), 7(b) and 9 state general opposition to the proposal.

The DOE believes in Achievement First's record of success and supports the permanent placement of an Achievement First charter school in District 32. Achievement First's schools have a strong track record of academic achievement: of the five Achievement First schools that received a Progress Report in 2011-2012, four earned an overall score of A and the other earned a B. Furthermore, on the 2012-2013 New York State Exams, Achievement First Charter School's demonstrated strong results in ELA, math, and science. The co-location of a public charter school does not impact the resources available to other District 32 schools, other than by enrolling students who might have attended those schools. The DOE supports parent choice and is committed to providing different educational options to communities. Charter schools are also public schools, and thus represent a distinct alternative for parents who are not satisfied by the DOE options available.

Given that building space is scarce in New York City neighborhoods, and the growing enrollment needs of our 1.1 million students, the DOE must use its existing public buildings in the most efficient manner possible. Sharing space is central to New York City's strategy for school improvement. The DOE has over 900 schools and programs co-located with at least one other district or charter school in multi-school campus buildings. Co-locating new charter schools with district schools is necessary to ensure that students and families in every community have increased access to and range of high-performing educational options. There are several structures to facilitate a smooth co-location between the two schools. Co-located schools on campuses must actively participate in a Building Council, which is a campus structure for administrative decision-making for issues impacting all schools in the building. Additionally, a Shared Space Committee will review the implementation of the BUP once it has been approved by the Panel for Educational Policy. To the extent that principals and charter leaders are unable to reach agreement upon the use of shared spaces, they may avail themselves of a mediation process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

The DOE believes there is a need for increased options for students in Brooklyn, including those students located in District 32. The DOE strives to ensure that all students in New York City have access to various educational options at every stage of their education. This proposal aims to provide a new option for these students.

Comment 7(c) claimed that P.S. 299 is "on the chopping block".

This proposal does not propose the phase-out or closure of P.S. 299. As stated in the EIS, the proposal is not expected to impact admissions, enrollment or programming at P.S. 299. Additionally, the DOE believes that Achievement First North Brooklyn Prep will be a valuable addition to the District 32 community.

Comments 2(f), 14 and 15 assert that there are specific safety concerns around entry and exit, especially with respect to fire drills or evacuations.

Every school has a fire safety plan which includes plans for fire drills and evacuations in case of emergencies. If this proposal is approved, P.S. 299 and Achievement First North Brooklyn Prep will work with the Office of Safety and Youth Development to modify the fire safety plan as needed based on the additional enrollment in the building.

If this proposal is approved, Achievement First North Brooklyn Prep would sit on the School Safety Committee. The School Safety Committee is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency.

The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the principals when it identifies the need for additional security measures.

In addition, the Certificate of Occupancy issued by New York City Department of Buildings for K299 provides that the school has a maximum occupancy rate of over 2,500, which is sufficient to safely accommodate all students and staff of both schools, should this proposal be approved.

Finally, several buildings in the city are co-located with both district and/or charter schools. These buildings have sufficiently adopted new safety plans that take into account stairwells and other building configuration issues. The final decision on how to appropriately plan for these situations resides with the Building Council.

Comment 3(d) references the process by which a school can apply for a grade expansion.

The Office of New Schools manages the process for determining any changes to schools' current grade levels. Reconfigurations include either the expansion or truncation of grade levels served at a school and may be initiated by the Office of Portfolio Management or the school that wishes to reconfigure. All grade reconfigurations are assessed via the following decision factors: school quality, physical space, demographic need, impact on enrollment, and community input.

If it is determined that a school will expand, location for the expansion may be either in the school's current building or at another building, resulting in a split-site. As of the date of this analysis, P.S. 299 has not applied for a grade expansion with the DOE.

Comment 20 expresses concern that this co-location proposal would prevent P.S. 299 from offering additional programming.

While the co-location will reduce the amount of excess space that is currently available to P.S. 299, P.S. 299 will continue to receive its adjusted baseline footprint allocation of rooms throughout the course of the phase-in of Achievement First North Brooklyn Prep. The DOE does not believe that the co-location will necessarily prevent P.S. 299 from offering any programming that it currently offers. As stated in the EIS, the co-location may change the way those programs are configured. For example, some activities may need to share classroom space or the scheduling of these activities may change as a result of greater demands on the available space during or after school hours. Students will continue to have the opportunity to participate in a variety of extracurricular programs, though the specific programs offered at a given school are always subject to change.

Comment 16(a) claims that P.S. 299's pre-kindergarten program is filled to capacity for the 2013-2014 school- year.

The DOE acknowledges that P.S. 299's pre-kindergarten program is at capacity at this time.

Comment 16(b) states that the principal requested to expand the pre-k program and the proposal will limit the expansion for the Pre-K program.

The DOE notes that the Office of Portfolio Management received a request from P.S. 299 for an expansion of its Pre-K program in September 2012.

During the 2012-2013 school year, the DOE had additional funds and added 4,000 additional full-day pre-k seats across the city in our public schools and community-based organizations for the 2013-2014 school year. These seats were all allocated through a centralized application process administered by Office of Early Children Education ("OECE"). After multiple forms of communication to principals and a webinar for principals, OECE held a public school application process through which schools could apply to add pre-k seats. P.S. 299 did not apply through that process and therefore it was not considered for additional seats.

As stated in the EIS, this proposal is not expected to impact the pre-kindergarten program at P.S. 299. Incoming pre-kindergarten students may apply to attend the pre-kindergarten program at P.S. 299 through the centralized pre-kindergarten admissions process. Verified zoned siblings of students who are pre-registered or enrolled at the time of application submission and will be enrolled in kindergarten through fifth grade at the start of the following school year at P.S. 299 will have first priority for admission to the pre-kindergarten program at P.S. 299. Students who reside in the P.S. 299 zone who do not have siblings enrolled at P.S. 299 will have second priority for admission.

As with all pre-kindergarten programs, the availability of pre-kindergarten at P.S. 299 will be subject to continued funding availability and demand.

Comments 2(e), 12 and 13 express concern over the co-location of middle school students in a building with elementary school students.

Due to space limitations, it is not unusual for varying grade levels to be co-located in a building together. There are successful examples of mixed grade co-located school buildings or campuses in New York City. These examples include:

- Building K324 currently houses three schools: M.S. 267, an existing middle school serving students in grades sixth through eighth, La Cima Charter school, a charter elementary school serving students in grades K-5, and Bedford Stuyvesant Collegiate, an existing charter secondary school, which is currently in the process of growing to serve students in grades 5-12. Members of the building council worked together to secure financing from KaBOOM to resurface the schoolyard and playground for all of the children at K324.
- The Julia Richman Educational Complex, which houses four small high schools, a K-8 school, and a District 75 program
- Building M092 currently houses three schools: St. Hope Leadership Academy Charter School, a charter middle school serving students in grades fifth through eighth, P.S. 92, a district elementary school which serves students in grades K-5, and Democracy Prep Charter School, a charter high school serving students in ninth through twelfth grade.

These comments also express concerns about safety issues at P.S. 299. With respect to Achievement First North Brooklyn Prep's proposed co-location in K299, it should be noted that in many buildings housing co-located schools, each school is assigned floors or hallways for their classrooms and specific stairways for students to use. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity.

Comments 6(c) and 17 assert that more resources should be given to P.S. 299 in place of the proposal

Fair Student Funding (FSF) dollars – approximately \$5.0 billion in the 2012-2013 school year based on projected registers – are used by all district schools to cover basic instructional needs and are allocated to each school based on the number and need-level of students enrolled at that school. All money allocated through FSF can be used at the principals' discretion, such as hiring staff, purchasing supplies and materials, or implementing instructional programs. As the total number of students enrolled changes, the overall budget will increase or decrease accordingly, allowing the school to meet the instructional needs of its student population. In addition to the FSF student-need based dollars a school receives, all schools receive a fixed lump sum of \$225,000 in FSF foundation and \$50,000 in Children First Network Support to cover administrative costs.

Principals have discretion over their budget and make choices about how to prioritize their resources. New schools may choose to hire fewer administrative staff (e.g. only a single assistant principal) freeing up dollars to be directed toward other priorities.

All schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. We do everything we can to offer struggling schools leadership, operational, instructional, and student supports that can help turn a struggling school around.

Comment 1(a) claims that the Building Utilization Rate is incorrect in the proposal, Comment 3(c) claims that P.S. 299 utilizes all the space that it is currently granted and Comment 3(b) claims that there is not enough room for P.S. 299 in the current building.

The Building Utilization Rate stated in both the EIS and BUP is correct. Based on Budget Register Projections for the 2013-2014 school year, the Building Utilization rate at building K299 is 57%.

All references to building utilization rates in this document are based on target capacity data from the 2011-2012 Blue Book and enrollment data from the charter projections as of June 2013 and the 2013-2014 Budget Register Projections. Enrollment projections for new charter schools opening in 2014-2015 are based on enrollment in the charter application. This methodology is consistent with the manner in which the DOE conducts planning and calculates space allocations and funding for all schools. In determining the space allocation for co-located schools, the Office of Space Planning will conduct a detailed site survey and space analysis of the building to assess the amount of space available in the building.

Comment 1(b) claims that the building will be overcrowded as a result of the proposal.

If this proposal is approved, the building will serve approximately 1,925 - 2,155 students and have a utilization rate of 90% - 101% in the 2018-2019 school year, when both schools, have reached full scale and stable enrollment in K299. As discussed in the EIS and in the BUP while the utilization rate may be in excess of 100%, all schools will receive space that meets their instructional needs and the building has space to accommodate both P.S. 299 and Achievement First North Brooklyn Prep. Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation.

In addition, charter school enrollment plans are frequently based on larger class sizes than target capacity, contributing to building utilizations above 100% while not impacting the utilization of the space allocated to the traditional public school.

Comments 2(b) and 19 question the process by which shared spaces are divided amongst the co-located schools.

The BUP puts forth a proposed shared space schedule for the co-located schools that is feasible and demonstrates that the co-located schools may be treated equitably and comparably in the use of shared spaces. If this proposal is approved, both schools will have access to the shared spaces in building K299. The final shared space schedule will be collaboratively drafted by the Building Council if the proposed co-location is approved by the PEP.

Comments 1(c) and 2(d) express concern over the programming of specific spaces such as the auditorium as a result of the proposal.

The Citywide Instructional Footprint (the “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 are 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 in a 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/ronlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011\\_FINAL.pdf](http://schools.nyc.gov/NR/ronlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf)

As stated in both the EIS and BUP, both schools will receive their baseline footprint.

The BUP details the number of class sections each school is expected to program each year through 2018-2019 and allocates the number of classrooms accordingly. The assignment of specific rooms and the location for each 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.

If conflicts emerge and progress is impaired, the Building Council will follow the dispute resolution procedures outlined in the Campus Policy Memo available at the following link: <http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo>.<http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo.htm>.

Comment 2(c) states that students with special needs require specific spaces.

The allocation of rooms provided for special needs students is consistent Citywide, and is applied consistently in this proposal. This proposal does not require that any special education students be provided instruction in spaces that are not designed for student use.

Comment 4(a) implies that P.S. 299 will be forced to follow rules and policies of Achievement First North Brooklyn Prep and not its own.

P.S. 299 will still maintain the ability to set their own rules and procedures within current regulations and guidelines.

Comments 6(j) demands that the DOE involve parents before decisions are made.

Consistent with applicable statutes and regulations, the DOE solicited public comments via a joint public hearing, a dedicated voicemail number and e-mail address for this proposal. The DOE also met with the school leadership team in building K299, and CEC 32 prior to the joint public hearing on this proposal. Moreover, the DOE provided notice to all requisite stakeholders as required by law.

Although the DOE recognizes that some members of the P.S. 299 community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities in the K299 building will be able to foster a collaborative and mutually respectful environment for all students, staff, and faculty members in the building and that the District 32 community will be provided with an additional middle school option for families.

Comment 6(g) claims that the DOE will not take into account what is said at the Joint Public Hearing.

Chancellor's Regulation A-190 sets out the public review and comment process that the DOE undertakes with respect to all such proposals by the Chancellor, including this proposal to co-locate Achievement First North Brooklyn Prep. Included in this process is a joint public hearing in which public comment is collected and analyzed. The DOE also solicits community feedback via phone, email, and the DOE Web site until 24 hours prior to the PEP vote. Those comments and analysis are then made available to the Panel for Educational Policy before the Panel votes on a proposal.

The DOE will continue to listen to community feedback consistent with Chancellor's Regulation A-190. Indeed, as described above, more than 170 members of the public attended the joint public hearings concerning the proposal. This indicates that the community had adequate notice of the proposal and a meaningful opportunity to comment on it.

Comments 6(d, f) claim that the proposal is being forced and rushed through because it involves a charter school and the DOE should wait until the new mayor is elected before moving forward with this proposal.

All proposals for the October 30<sup>th</sup> PEP vote represent a continuation of DOE's strategy to increase access to high quality schools, both district and charter, in communities that need better options for the 2015-2016 school year. Consistent with this, the PEP already approved 23 proposals for September 2014 implementation during the May and June 2013 PEP meetings.

The development of these 2015-2016 proposals reflects our extensive strategic planning to advance our proven strategy of bringing high quality district and charter schools online, as well

as our desire to allow the maximum allotment of time for communities and educators to work towards their successful implementation.

Forward planning allots more time for:

- School/leaders to meet each other; and
- Office of Space Planning to plan school placement and implement any needed facilities upgrades
- Charters to submit proposals for facilities matching
- Division of Facilities to review and conduct work on approved proposals

Comment 18 claims that building K299 is not structurally built to serve middle school students. Additionally Comment 3(a) claims that the bathrooms are not built for middle school aged children.

While a facility may initially be designed to serve a specific age level, that does not limit the ability to serve different age levels in that building.

In many buildings where schools are co-located, each school is assigned bathrooms on the floors or hallways of their classrooms and specific stairways for students to use. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity. If the assignment of specific bathrooms is not working or is inadequate, the Building Council may discuss alternative arrangements.

Additionally, there are many K-8 schools throughout the city in which students in elementary and middle school grades share the same bathrooms without issue.

Comments 11(a-c) express support for the proposal and thus do not require a response.

### **Changes Made to the Proposal**

No changes have been made to the proposal.