



Public Comment Analysis

Date: October 29, 2013
Topic: The Proposed Co-location of Grades Six through Eight of Explore Exceed Charter School (84K333) with Existing Schools P.S. 375 Jackie Robinson School (17K375) and M.S. 352 Ebbets Field Middle School (17K352) in Building K320 Beginning in 2015-2016
Date of Panel Vote: October 30, 2013

Summary of Proposal

On September 13, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) and Building Utilization Plan (“BUP”) describing a proposal to site and co-locate the sixth through eighth grades of Explore Exceed Charter School (84K333, “Explore Exceed”) in Building K320 (“K320”), located at 46 McKeever Place Brooklyn, NY 11225, in Community School District 17 (“District 17”), beginning in 2015-2016. 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. Explore Exceed is an existing public charter school that currently serves students in kindergarten through fourth grade in Building K022 (“K022”), located at 443 St. Marks Avenue Brooklyn, NY 11238. Explore Exceed is in the process of phasing in to serve grades kindergarten through five in K022. If this proposal is approved, Explore Exceed’s sixth through eighth grades will be sited in K320 beginning in the 2015-2016 school year. Explore Exceed will add one grade each year until it reaches full scale in 2017-2018 and serves sixth through eighth grade in building K320. Explore Exceed will be co-located in K320 with P.S. 375- Jackie Robinson School (17K375, “P.S. 375”), an existing zoned elementary school that serves students in kindergarten through fifth grade and offers a pre-kindergarten program, and M.S. 352 Ebbets Field Middle School (17K352, “M.S. 352”), an existing zoned middle school that serves students in sixth through eighth grades.

K320 has the capacity to serve 1,272 students. In 2013-2014, P.S. 375 is projected to serve approximately 575 students in pre-kindergarten through fifth grade and M.S. 352 is projected to serve approximately 307 students in sixth through eighth grade. This yields a building utilization rate of approximately 69%, which demonstrates that the building is “under-utilized” and has space to accommodate additional students. If this proposal is approved, in 2017-2018 once Explore Exceed is at full scale, K320 will serve approximately 1,091-1,226 students from Explore Exceed, P.S. 375 and M.S. 352 collectively, which yields a projected utilization rate of 86%-96%. Thus, K320 has sufficient space to accommodate the proposed co-location.

The EIS and and BUP describing this proposal can be accessed here:
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct30SchoolProposals>.

Copies of the EIS and BUP are also available in the main offices of Explore Exceed, P.S. 375, and M.S. 352.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding the proposal was held at the K320 building on October 24, 2013. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 243 members of the public attended the hearing, and 40 people spoke. Present at the meeting were Chancellor’s Designee Sara Kaufman; District 17 Community Education Council (“CEC 17”) President Nicole Job; Fred Baptiste, member of the Panel for Educational Policy; P.S. 375 School Leadership Team (“SLT”) representative Principal Dr. Marion Wilson; M.S.

352 SLT representatives Principal Margie Baker and Bernadette Sandy; Explore Exceed Principal Curtis Palmore; Morty Ballen, founder of Explore Exceed Charter Schools; and Council Member Letitia James. In addition to Sara Kaufman, Vicki De Javier from the DOE's Division of Portfolio Planning was also present.

The following comments and remarks were made at the joint public hearing on October 24, 2013 on the proposal:

1. Nicole Job, president of CEC 17, commented as follows:
 - a. The CEC is opposed to the proposal.
 - b. The proposed charter school would be better suited in building K161, which has a school that is currently undergoing truncation of its middle school grades.
2. Margie Baker, principal of M.S. 352, commented as follows:
 - a. She is against the co-location proposal.
 - b. M.S. 352 has forged great partnerships with private partners such as the Brooklyn Nets and Nike.
 - c. M.S. 352's computer lab was renovated thanks to a grant from Council Member Letitia James.
 - d. M.S. 352 has many programs that it needs in order to grow.
 - e. M.S. 352 needs access to science lab rooms in order to be in compliance with Regents exam requirements.
 - f. She would like to use the existing space in K320 to add a Gifted & Talented program.
3. Curtis Palmore, principal of Explore Exceed, commented as follows:
 - a. He is excited to be in K320.
 - b. He recognizes the great work of P.S. 375 and M.S. 352.
 - c. Exceed Explore serves students with Individualized Education Programs ("IEPs") and provides other support services as needed.
 - d. Explore Exceed has fostered great working relationships with principals in other co-located buildings.
 - e. He understands there are space concerns, but is confident that the proposal can work in K320.
4. A commenter stated that:
 - a. Free education is a mandate.
 - b. M.S. 352 welcomes overage students, immigrants, students with special needs. Charter schools do not.
 - c. She is not against charter schools, but is against their co-location in public school buildings.
5. Morty Ballen, founder of Explore Exceed Charter Schools, commented as follows:
 - a. He is inspired by the great work the existing schools do.
 - b. He believes students need critical thinking skills in order to succeed.
 - c. He has had the great pleasure of working with CEC 17.
 - d. All of the three Explore Exceed schools in District 17 are co-located and the principals of these schools have been able to work well together.
6. The PTA President of P.S. 375 commented that:
 - a. The DOE needs to reassess the concept of under-utilization.
 - b. The students in the neighborhood will not be offered a first priority to Explore Exceed's middle school grades.
 - c. The student body of Explore Exceed will not be reflective of the demographics of the neighborhood.
 - d. P.S. 375 serves students with special needs.
 - e. P.S. 375 needs additional funding like charter schools to provide the same level of service that charter schools provide.
7. A commenter stated that:
 - a. There is already a middle school in the building.
 - b. There are already issues with the current co-location in the building.
 - c. Having additional older students in the building may pose safety concerns for the younger students.
 - d. Cafeteria capacity is not high and may thus pose safety concerns.
8. A commenter stated that:
 - a. Her son is performing well academically in high school due to the support he received at M.S. 352.
 - b. The co-location proposal would reduce the already-limited resources in the existing schools.

9. A commenter stated that:
 - a. She is against charter schools due to the pressure they place on students.
 - b. Her son is enjoying the programs that the school offers.
 - c. The school community needs to hold elected officials accountable.
10. A commenter stated that:
 - a. She wonders if Explore Exceed will take students with special needs. Her children who have special needs have been on Explore Exceed's waitlist for years.
 - b. She is against the proposal.
11. A commenter stated that:
 - a. She is against charter schools.
 - b. Her child was expelled from a charter school due to "corporal punishment."
 - c. It was clear that Explore did not want to admit her child as she was on Explore's waitlist for six years.
 - d. The students in the existing schools need access to the dance studio and computer lab on the fourth floor.
12. An SLT member of M.S. 352 commented that:
 - a. Every student has a right to a quality free education.
 - b. The students in the existing schools would be further disenfranchised by losing space.
 - c. The schools need instructional space to effectively adopt the Common Core Learning Standards.
 - d. She has concerns over sharing resources.
 - e. Available funding should be geared towards existing schools.
13. A commenter stated that:
 - a. She is a product of Brooklyn public schools.
 - b. She believes in charter schools.
 - c. Co-locations are logistically challenging, but Explore Exceed will try to facilitate the process if the proposal is approved.
14. A commenter stated that:
 - a. He attended a charter school, but was expelled due to a disability.
 - b. M.S. 352 gave him the opportunity to take the Regents exam.
 - c. He is against charter schools.
15. Council Member Letitia James commented that:
 - a. Co-locations offer a false sense of choice.
 - b. She has been a vocal supporter of public schools, including the ones in K320.
 - c. She calls for a moratorium on the current proposals as they would bind the next administration to the current administration's policies.
 - d. Co-locating a charter middle school in a building that already has a middle school will lead to competition.
 - e. She questions the timeline of the proposal as it will not take effect until the 2015-2016 school year.
 - f. Public schools are lacking adequate resources.
 - g. Charter schools do not serve students with special needs. These students are usually disciplined and discharged.
16. A commenter stated that:
 - a. The fourth floor is currently occupied by the self-contained special education classes. The special education population has been showing great progress.
 - b. There are not enough resources in the existing schools.
 - c. Charter schools have more resources than traditional public schools.
 - d. She is against the proposal.
17. A commenter stated that:
 - a. She wants students to remain safe.
 - b. Another school would hinder students from learning adequately.
 - c. The proposal would lead to students having lunch at 10 a.m.
18. A commenter stated that:
 - a. His organization partners with the existing schools as part of the Explore program.
 - b. He asks if another co-location would lead to students losing access to the gym, which was recently renovated with a grant from Nike.

19. A commenter stated that:
 - a. She is active in the community board.
 - b. She would like to clarify that charter schools are public schools.
 - c. She has two children with IEPs and are both supported at Explore Exceed.
 - d. The relationship between the principals at the building where Explore is currently co-located has been great.
20. Fred Baptiste, member of the Panel for Educational Policy, commented as follows:
 - a. The projected utilization rates in the proposal are based on 2011-2012 figures. There will be a new mayor in 2015, when the proposed school would be sited, and so the projected utilization rates will be outdated.
 - b. The proposal would lead to overcrowding and would not leave enough space for the existing schools' growth.
 - c. Access to shared spaces such as the computer lab is important.
 - d. Community Boards 8 and 9 have expressed opposition to the proposal.
21. Multiple comments expressed opposition to the proposal for a variety of reasons including concerns of overcrowding, the proposed breakfast and lunch schedules, already limited resources, and decreased access to shared spaces.

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

22. The DOE received a letter from Community Board 9 requesting that the DOE postpone the joint public hearings at buildings K161 and K320 in order to allow for additional input from interested parties.

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

Comments 3, 5, 13, and 19 are in support of the proposal and therefore do not require a response.

Comments 1(a), 2(a), 10(b), 16(d), and 20(d) express general opposition to this proposal, comment 7(b) expresses reservations about the existing co-location in K320 while 15(a, c) express opposition to co-locations overall.

There are times when the DOE and some members of the community differ in their opinions about specific projects. This proposal is driven by the DOE's desire to more efficiently utilize its building capacity to serve students and to provide high-quality educational options for families in District 17.

The DOE believes that, if this proposal is approved, the school communities in the K320 building will be able to foster a collaborative and mutually respectful environment for all students, staff, and faculty members in the building. With respect to the existing co-location between P.S. 375 and M.S. 352, the DOE encourages Building Councils to resolve issues within campus by working collaboratively to make decisions in the best interests of all students. If the Building Council is unable to reach a resolution on an issue, it should engage in the dispute resolution process outlined in the Campus Policy Memo available at the following link: <http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo.htm>.

Comments 4(c), 9(a), 11(a), and 14(c) express general opposition to charter schools and their co-location in public school buildings.

Roughly half of schools in New York City share space in a building. Because of co-locations, the DOE is able to use limited facilities efficiently while simultaneously creating additional high-quality options for New York City families. This is necessary when there are scarce facilities and a demand for more high-performing options. The DOE seeks to provide space for additional education options for all students, regardless of whether students are served in DOE or public charter schools. We welcome public charter schools to lease or provide their own space, but we will offer space in DOE buildings where it is feasible to do so. The DOE does not lease space directly for charter schools; a charter school interested in parochial school or other space would have to acquire or lease that space with private funds.

Comments 1(b) and 7(a) concern the selection of K320 for the proposed co-location, and comment 6(a) suggests that the building is not underutilized.

As noted earlier, this proposal is driven by the DOE's desire to provide more quality educational options for families in District 17.

As discussed above, building space is scarce in many New York City neighborhoods. Given this reality and the growing enrollment needs of New York City's 1.1 million students, the DOE must use its existing public school buildings in the most efficient manner possible. The DOE must also work to ensure that students and families in every community have high-quality educational options. To this end, each year the DOE's Division of Portfolio Planning publishes and requests school and community feedback on building utilization information and potential changes. Building K320 was identified as underutilized pursuant to the November 20, 2012 Revised Under-utilized Space Memorandum, available at http://schools.nyc.gov/NR/rdonlyres/6D8EA76A-82FA-4740-9ED1-66BCABEE8BFB/134525/UnderutilizedSpaceMemorandum112012_vFINALforprint.pdf

As described in the EIS, K320 has the capacity to serve a total of 1,272 students. In 2013-2014, P.S. 375 is projected to serve 575 students in pre-kindergarten through fifth grade and M.S. 352 is projected to serve 307 students in sixth through eighth grade, which means that there are more than 300 seats available at Building K320. This yields a projected utilization rate of approximately 69%. In 2016-2017, when the proposed new middle school reaches full-scale, P.S. 375, M.S. 352 and the new middle school will serve a combined total of approximately 1,091-1,226 students, yielding an estimated building utilization rate of 86%-96%. Thus, K320 is currently underutilized and has sufficient space to accommodate the proposed co-location.

With respect to building K161, a proposal to re-site and co-locate Success Academy Charter School – Crown Heights in K161 was approved by the PEP on October 15, 2013. After Success Academy Charter School—Crown Heights has reached full scale, there will not be sufficient excess space at K161 to accommodate an additional school.

Comments 2(b), 8(a), 9(b), 14(b) and 15(b) support the programming and partnerships at P.S. 375 and M.S. 352 while comments 2(c,d,e), 11(d), 12(b,c) and 17(b) suggest that the reduction of available space in K320 will have an adverse impact on the academic enrichment programming, extracurricular activities, and partnerships at P.S. 375 and M.S. 352.

While the co-location will reduce the amount of excess space which is currently available to P.S. 375 and M.S. 352, the co-location is not expected to impact instructional programming, extra-curricular offerings, or partnerships at P.S. 375 and M.S. 352. The DOE anticipates that P.S. 375 and M.S. 352 will continue to offer a full range of programming based on student interests, available resources, and staff support for those programs.

When Explore Exceed is fully phased in, each school will continue to receive space in excess of its baseline or adjusted baseline number of full-size instructional rooms it is allocated pursuant to the Citywide Instructional Footprint (the "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 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 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/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

The music room will remain a shared space, as indicated in the BUP. The assignment of other specific rooms, including those for use in serving students with IEPs or special education needs, as well as the rooms currently used as a dance studio and computer lab, will be made in consultation with the principals of each school and the Office of Space Planning if this proposal is approved. The dance room and computer lab are located in regular instructional rooms, and as such the existing schools may continue to offer dance and computer instruction within the excess space allocated to them pursuant to the BUP.

Comment 20(b) contends that the proposal will cause the building to be overcrowded.

As stated in the EIS, the projected building utilization rate at K320 when the new middle school is fully phased in will be 86%-96%. In addition, as set forth in the BUP, even once Explore Exceed has fully phased in, there will be 11 full-size instructional rooms in excess of all schools' respective baselines (or adjusted baseline allocations) of space, which indicates that there is sufficient space to accommodate all three schools.

Comments 11(d), 17(c), 18(b), 20(c) and 21 in part concern the change in access to and scheduling of shared spaces such as the cafeteria and gymnasium.

The Building Utilization Plan sets 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. The final shared space schedule will be collaboratively drafted by the Building Council if the proposed co-location is approved by the Panel for Educational Policy.

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.htm>.

With respect to concerns about the lunch schedule, it should be noted that under the proposed shared space schedule, the earliest proposed lunch time is 10:45 am to 11:15 am for Explore Exceed. P.S. 375 has been allocated a lunch period from 12:00 pm to 1:30 pm and M.S. 352 has been allocated a lunch hour from 11:15 am to 12:00 pm. The DOE believes that this allocation is appropriate because it minimizes the disruption to the existing schools' current lunch schedule while providing sufficient time for all students to be served.

Furthermore, as to concerns about the use of the gymnasium, the proposed shared schedule reflects an allocation proportional to each school's enrollment, and results in P.S. 375 receiving the greatest amount of time, M.S. 352 receiving the next greatest amount of time, and Explore Exceed receiving the least amount of time.

Comments 7(c,d) and 17(a) concern the proposal's impact on campus safety and governance.

The DOE does not believe that this co-location proposal will adversely impact the safety of students in K320. Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. School leaders from the new middle school will join the School Safety Committee. 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, as stated in the EIS, the DOE makes available the following supports to schools relating to safety and security:

- Providing "Best Practices Standards for Creating and Sustaining a Safe and Supportive School," as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children's First Network (CFN) Safety Liaisons;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

With respect to concerns about additional older students being co-located in a building with younger students, the DOE notes that it is not unusual for varying grade levels to be co-located in a building together. Besides the current

co-location of middle and elementary school students in K320, there are other successful examples of mixed grade co-located school buildings or campuses in New York City.

These examples include:

- 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 middle school serving students in sixth through eighth grade.
- 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.

Comment 2(f) proposes that the available space in the K320 building should be utilized to increase the number of seats in the existing schools, specifically for the addition of a Gifted & Talented program at M.S. 352.

The DOE closely monitors the need to create additional elementary, middle, and high school seats across the city. As described above in the response to comment 20(b), there will be a number of full-size instructional rooms in excess of all schools' baseline (or adjusted baseline) allocations of space after Explore Exceed has completed its phase-in. Therefore, the proposal does not necessarily preclude the expansion of any of the existing schools.

Every year, the DOE determines the number of Gifted & Talented programs needed by each district based on the number of students who meet the eligibility requirements. Currently, District 17 has a Gifted & Talented program at 17K316 and 17K161. Due to low demand, beginning in 2013-2014, P.S. 161 will no longer accept new incoming kindergarten students in its Gifted and Talented Program. This indicates that there is not currently a need for additional Gifted & Talented seats in the district. However, the DOE will continue to monitor the need for additional Gifted & Talented programs in District 17.

Comments 6(e) and 16(c) contend that charter public schools receive more funding than traditional public schools.

Charter schools receive public funding for general education students pursuant to a formula created by the state legislature, and overseen by the New York State Education Department. The DOE does not control this formula, and the funding formula for charter schools is not affected by the approval or rejection of this proposal. Charter management organizations, just like any other school Citywide, may also choose to raise additional funds to purchase various resources they feel would benefit their students (e.g., Smartboards, fieldtrips, etc).

Comments 8(b), 12(d,e), 15(d, f), and 16(b) concern the adequacy of existing resources for P.S. 375 and M.S. 352, and the proposal's potential impact on these resources.

In New York City, schools are funded through a per pupil allocation. That is, funding "follows" the students and is weighted based on students' grade level and need (incoming proficiency level and special education/English Language Learner/Title I status). For example, if a school's population declines from 2,500 to 2,100 students, the school's budget decreases proportionally—just as a school with an increase in students receives more money. Even if the DOE had a budget surplus, a school with declining student enrollment would still receive less total funding each year enrollment falls. As indicated in the EIS, though the proposal may result in up to 55-70 fewer fifth grade students vying for seats through the District 17 Middle School Process, this slight reduction is not expected to have a significant impact on any particular school in District 17. Therefore, the proposal is not expected to have any material impact on student enrollment— and thus no impact on the per-pupil allocation— at P.S. 375 and M.S. 352.

Comments 4(b), 6(b,c), 10(a), 11(b,c), 14(a), 15(g) concern Explore Exceed's admissions process, the demographics of its students, and its provision of services to students with special needs.

Any child eligible for admission to a district public school is eligible for admission to a public charter school. If the number of applicants exceeds the number of available seats at a charter school, a random selection process, such as a lottery, must be used. Lotteries select students randomly from among the applicant pool. In contrast, screened schools are able to select their students based on factors including academic achievement, attendance, teacher recommendation, and admissions tests.

Charter schools give preferences to students based on various factors, including, but not limited to, whether the applicant has a sibling already enrolled in the charter school, lives in the charter school's community school district, and/or is eligible for free or reduced price lunches. Charter may also include additional preferences for students that may be considered at-risk of academic failure (as defined by the school).

Explore Exceed's charter lottery for elementary grades will continue to provide a preference for District 17 students. Elementary school students at Explore Exceed will be given the opportunity to articulate to Explore Exceed's middle school grades. No lottery process will be conducted for Explore Exceed's middle school grades; returning students will attend the school and students will be admitted through a rolling waitlist process to backfill seats available through attrition.

In May 2010 the Charter Schools Act was amended to expressly require that charter schools demonstrate good faith efforts to attract and retain ELLs, students with disabilities, and students eligible for free or reduced lunch at rates comparable to those of the Community School District.

Pursuant 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 Learner ("ELL") students comparable to the district average. Charter schools which fail to meet the special education and/or ELL targets set by their authorizer risk being closed or having their renewal applications rejected. Charter schools must admit all students according to their lottery preferences, and may not turn away a student because of language ability, behavioral problems, or services required by an IEP.

With respect to comments concerning Explore Exceed's disciplinary policy, charter schools have the autonomy to develop discipline and suspension policies that work best for their student population. Each school's charter authorizer ensures that the policy is consistent with federal law.

Comments 6(d) and 16(a) concern the potential impact of the proposal on the provision of special education services at P.S. 375 and M.S. 352.

As stated in the EIS, the DOE does not believe that the proposal will impact students being served in special education programs at P.S. 375 and M.S. 352. The existing Integrated Co-Teaching and self-contained special education classes and Special Education Teacher Support Services will continue to be provided, and students with disabilities will continue to receive mandated services in accordance with their IEPs. Current and future students with IEPs will continue to receive mandated services at P.S. 375 and M.S. 352.

Comments 15(c, e), and 20(a) concern the DOE's issuance of proposals for implementation in the 2015-2016 school year.

All proposals for the October 30th PEP vote represent a continuation of DOE's strategy to increase access to high quality schools in communities that need better options for the 2014-2015 and 2015-2016 school years. Consistent with this, the PEP already approved 46 proposals for September 2014 implementation during the May, June, and October 15th 2013 PEP meetings.

The development of these 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; and
- Charters to submit proposals for facilities matching; and

- Division of Facilities to review and conduct work on approved proposals.

With respect to concerns about the accuracy of projected utilization rates for the 2015-2016 school year and beyond, it should be noted that the projections are based on the current enrollment of the entry point grade and assume that the same number will age up and that there is either a stable incoming enrollment at the entry point or an enrollment consistent with historical patterns. The projections already account for a substantial increase in enrollment at P.S. 375. There is no indication that the enrollment levels at M.S. 352 will substantially increase during the implementation of this proposal.

Comment 22 requested that the DOE postpone the public hearings to allow for additional input.

The DOE provided notice to all requisite stakeholders as required by law, and has and will continue to listen to community feedback consistent with Chancellor's Regulation A-190. Although not a required participant, Community Board 9 was notified of the joint public hearing.

In compliance with applicable state laws and Chancellor's Regulation A-190, the community had approximately a month and a half from the issuance of the proposal to the joint public hearing to review the proposal. In addition, the DOE continued to accept written and oral comments via a dedicated e-mail address and voicemail number both before and after the joint public hearing. Finally, interested parties may provide public comment at the PEP meeting on October 30.

Comments 4(a), 9(c), 12(a), and 18(a) do not directly relate to the proposal and thus do not require a response.

Changes Made to the Proposal

No changes have been made to this proposal.