



Revised Public Comment Analysis

Date: February 24, 2010

Topic: Proposed Co-location of Metropolitan Lighthouse Charter School with an Existing School in School Buildings X093 and X893

Date of Panel Vote: February 24, 2010

The analysis of public comment regarding the proposed co-location of Metropolitan Lighthouse Charter School (“Metropolitan Lighthouse”) with P.S. 93 in school buildings X093 and X893 was revised on February 24, 2010, to reflect additional comments that had not been captured in the analysis that was posted on the New York City Department of Education’s (“DOE”) Web site on February 23, 2010.

One advocacy organization submitted general comments objecting to all proposed co-locations of charter schools with existing district schools. Although the comments did not address any one co-location proposal in particular, the DOE has appended these comments to the public comment analysis for each of the proposed charter co-locations.

Summary of Proposal

In 2010-11, Metropolitan Lighthouse Charter School (“Metropolitan Lighthouse”), a new public school that will serve grades K-12 pending reauthorization of its charter in 2015 and 2020, will open and be temporarily housed in school building X093 and minischool building X893, located at 1535 Story Avenue in the Bronx. The Department of Education (“DOE”) will continue working to identify a long-term site for Metropolitan Lighthouse that will serve the full organizational needs of the school when operating at full scale. During this interim co-location, Metropolitan Lighthouse will be co-located with P.S. 93 Albert G. Oliver. P.S. 93 is currently co-located with Carl C. Icahn North Bronx Charter School (84X378, “Icahn North”), which will relocate to a new school building prior to the start of the 2010-11 school year. Metropolitan Lighthouse will open in the space made available when Icahn North vacates the building. No P.S. 93 students will be displaced by this proposal, and both schools will have adequate space and facilities resources to support all students, including those with special needs.

The co-location of Metropolitan Lighthouse and P.S. 93 in X093 and X893 will achieve several key goals.

First, by seeding the school into space that would otherwise be underutilized, the creation of Metropolitan Lighthouse will help alleviate elementary school overcrowding in the Soundview area. Metropolitan Lighthouse will open in 2010-11 with approximately 130-140 students in Kindergarten and grades 1 and 2, and will add one grade cohort annually until it achieves scale in 2021-2022. While admission to Metropolitan Lighthouse will be via lottery, District 8 students will receive preference in that lottery, yielding a net gain in seats serving District 8 students.

Building X093 has the capacity to accommodate Metropolitan Lighthouse at least during the 2010-11 school year. In 2008-2009, the target capacity of X093 was 513 students, and its target utilization rate was 72 percent. The 2008-2009 target capacity of X893 was 157 and its target utilization rate was 103 percent. This year, P.S. 93 enrolls 404 students. Icahn North currently serves 177 students in K-4 and will move out of the building prior to the start of the 2010-2011 school year. Thus, there will be sufficient space in X093 and X893 for Metropolitan Lighthouse and P.S. 93 to operate at full organizational capacity in 2010-2011.

The creation of Metropolitan Lighthouse will also serve to increase access to high quality elementary school options for students residing in District 8. Metropolitan Lighthouse is chartered by the DOE and is operated by the Lighthouse Academies charter school network. There is one other Lighthouse Academy operating in New York City, and it has a strong track record of serving its students very well. The Bronx Lighthouse Charter School opened in 2004 and currently serves grades K-7 in District 12. Pending reauthorization of its charter by the DOE in 2014, The Bronx Lighthouse Charter School will serve grades K-12 at scale. The school earned an A grade on its 2008-09 Progress Report, with 68.0 percent of students scoring Level 3 or 4 in ELA (14.2 points higher than the District 12 average) and 92.3 percent of students scoring Level 3 or 4 in Math (21.3 points higher than the District 12 average). Bronx Lighthouse achieves these outcomes while serving a high-need student population. Currently, 86 percent of students attending Bronx Lighthouse are eligible for free or reduced-price lunch and 97 percent of Bronx Lighthouse students were black or Latino. Additionally, 8.3 percent of students have IEPs (compared with 11.5 percent across District 12) and 8.6 percent of Bronx Lighthouse students are English language learners (compared with 21.6 percent in District 12).

An Educational Impact Statement on this proposal was posted on the DOE's Web site on January 8, 2010.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing was held at X093 and X893 on February 22, 2010, and all interested parties had an opportunity to provide input on the proposal. Thirty-two people attended the hearing, and seven people spoke. Two speakers supported the proposal, noting that Metropolitan Lighthouse could have a productive and positive relationship with P.S. 93 and the Soundview community. Five members of the public spoke in opposition to the proposal, citing concerns about the possibility that Metropolitan Lighthouse will grow to scale in X093 and X893, which would create an environment where high school students would share space with early childhood education and elementary school students. One speaker requested that the space made available by Icahn North's move be reserved for P.S. 93's future expansion in light of

growing enrollment. Finally, there was a question about how Metropolitan Lighthouse will specifically alleviate overcrowding in surrounding elementary schools and which feeder schools would be drawn upon by Metropolitan Lighthouse for its population.

Summary of Issues Raised in Written and Oral Comments and Significant Alternatives Suggested

In the original version of this analysis, twenty-seven total comments regarding this proposal had been received; no oral comments had been received. All twenty-seven written comments supported the proposal, and they were sent by staff and faculty members of Bronx Lighthouse Charter School, parents of students attending Bronx Lighthouse Charter School, and members of the board of directors of Bronx Lighthouse Charter School. The writers noted the Bronx Lighthouse Charter School's students' academic success. No significant alternatives were originally proposed.

This analysis has been revised to reflect seven additional written comments that had been submitted. They raise the total number of comments to thirty-four. All seven comments were in support of the proposal, and they reiterated Bronx Lighthouse Charter School's students' academic successes. The additional comments did not propose any significant alternatives.

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

Regarding the concerns that Metropolitan Lighthouse would reach at-scale operations in X093 and X893, which would lead to high school students and elementary school students sharing buildings. On the contrary, the proposal specifically states that Metropolitan Lighthouse's siting in X093 and X893 is temporary and that the DOE and Metropolitan Lighthouse are working to identify a long-term site that would meet Metropolitan Lighthouse's organizational needs when it operates at its full scale.

As noted above, one of the key goals of siting Metropolitan Lighthouse in X093 and X893 is to help alleviate elementary school overcrowding in the Soundview area. Though the DOE and Metropolitan Lighthouse are still searching for a long-term site for Metropolitan Lighthouse, Metropolitan Lighthouse's planned recruitment of District 8 elementary grade students will help alleviate overcrowding in surrounding elementary schools. Furthermore, because P.S. 93 is a zoned school, using the space made available by Icahn North's re-siting would not accomplish this goal because an expanded P.S. 93 would not be able to draw students from surrounding schools that are overcrowded.

The DOE rejects the concern that Metropolitan Lighthouse will grow to its full Kindergarten-grade 12 scale in X093 and X893. Because siting Metropolitan Lighthouse in X093 and X893 would accomplish the goals of alleviating overcrowding in surrounding schools, the proposal will be presented to the Panel for Educational Policy as it is currently posted.

A copy of the educational impact statement for this proposal can be obtained at <http://schools.nyc.gov/NR/ronlyres/585A6F4E-316F-45AF-A1C4-0F38AC7260E8/75244/X093andX893MetroEISFinal1811.pdf>.

**Prepared by
Department of Education**

Summary of Issues Raised and Significant Alternatives Suggested

One advocacy organization submitted general comments objecting to all proposed co-locations of charter schools with existing district schools. In opposing the DOE's proposed co-locations, the comments cited the following reasons: (1) the DOE did not use accurate data in analyzing the utilization and capacity of school buildings; (2) the utilization formula used by the DOE is inadequate and assumes inappropriate target class sizes; (3) charter schools enroll fewer high needs students than district and citywide averages, leading to higher concentrations of high needs students in district schools; and (4) the expansion of charter schools has eliminated critical space from district schools.

The comments suggest a moratorium on any new charter co-locations, or expansions of existing charter schools within shared public school space, until an independent review is conducted to assess the capacity in existing public school buildings and make determinations about the amount of space required to reduce class size to mandated levels.

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

The comments assert that the DOE did not use accurate data in analyzing utilization and capacity of school buildings. The data used in analyzing the utilization and capacity of school buildings comes from "The Enrollment, Capacity and Utilization Report" (also known as the "Blue Book"), which is the standard by which the DOE measures the maximum capacity of a school building compared to the enrollment. These calculations are based on information provided by principals in the Annual Facilities Survey conducted by the School Construction Authority. In addition to considering the Blue Book information, the DOE conducts a physical survey of school buildings and takes into consideration current programming prior to proposing a change in utilization.

With regard to the comment regarding the use of inappropriate target class sizes, the DOE does use aspirational targets for school buildings but feels that these goals are appropriate for ensuring a quality education for all students. The DOE understands that building usage varies by schools and leaves programming decisions to school leaders. However, it is important to have a standard means of assessing the use of our limited physical plant resources consistently across the city. The class size targets used for the 2008-2009 Blue Book calculations of target capacity and utilization are lower than those used for determining historical capacity and utilization.

The comments assert that charter schools enroll fewer high needs students than the citywide and district averages, thereby leading to higher concentrations of high needs students in district schools. It is important to note that charter school admissions are done by lottery as

required by State Education Law. Charter schools do in fact serve the full range of public school students.

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