



## **Revised Public Comment Analysis**

Date: February 24, 2010

Topic: Proposed Grade Expansion of Girls Preparatory Charter School of New York (84M330)

Date of Panel Vote: February 24, 2010

The analysis of public comment regarding the proposed grade expansion of Girls Preparatory Charter School of New York (“Gils Prep”) 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**

Beginning in the 2010-2011 school year, Girls Preparatory Charter School of New York (“Girls Prep”)—an existing single-sex charter school serving grades Kindergarten-5—will gradually expand its current grade configuration to Kindergarten-8, pending final approval of the charter grade expansion application by the Board of Regents.

Girls Prep is currently housed in school building M188, located at 442 East Houston Street, in Manhattan’s District 1, where it is co-located with two other schools: P.S. 188 - The Island School and P.S. M094, which is a District 75 program. P.S. M094 currently serves students in grades 4-9 at M188, and P.S. 188 serves students in grades Pre-Kindergarten-8.

Beginning in 2010-11, Girls Prep will add grade 6 and will serve grades Kindergarten-6. Grade 7 will be added in 2011, and grade 8 will be added in 2012. During that same period, P.S. M094 students will graduate and enroll in other schools while new fifth-grade students will not be admitted to the program. This will reduce the total number of sections served in P.S. M094 from from nine to five, with a corresponding reduction in the program’s space needs. P.S. M094 will continue to serve middle school students in the building and enrollment will be based on the needs of District 75. Over time, as P.S. M094 students matriculate, M188 will have sufficient

space for the gradual growth of Girls Prep to full scale, while P.S. M094 and P.S. 188 both have sufficient space to operate at their full organizational capacities.

M188 has the capacity to accommodate the grade expansion of Girls Prep without displacing any students in the building. The 2008-09 target capacity for M188 was 1,010 students. The 2009-10 combined enrollment of P.S. 188, P.S. M094, and Girls Prep is 687 students. The projected enrollment of Girls Prep at full scale is approximately 550 students. The total projected building enrollment with Girl's Prep at scale would be 990 students.

The grade expansion of Girls Prep will create a high quality middle school option for District 1 students and families. While admission to Girls Prep is via lottery, District 1 students will continue to receive preference in that lottery. Additionally, by growing the school into otherwise underutilized space in an existing District 1 school building, the expansion of Girls Prep will add approximately 300 new middle school seats to the District.

This proposal was developed in consultation with principals from all impacted schools, a process which culminated in a specific plan to allocate space that would meet the needs of all three schools. Under that plan, the expanded grades of Girls Prep will be housed entirely on the fifth floor of M188. P.S. M094 currently occupies the entire fifth floor of the facility, but the leadership of P.S. M094 and Girls Prep devised a mutually agreeable solution for sharing space in that area of the building. This plan was confirmed to be viable during walkthroughs conducted by school leaders along with space planners from the Department of Education ("DOE").

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 M188 on February 11, 2010, and all interested parties had an opportunity to provide input on the proposal. Three hundred and ninety people attended the hearing, and fifty-four people spoke. Thirty-eight members of the public spoke in opposition to the proposal, citing concerns about safety in the building with the additional students, as well as the feasibility of sharing the gymnasium and auditorium with Girls Prep's expansion. Safety concerns were both general, and specific to developing a Shelter In plan for the building.

Several speakers proposed that Girls Prep secure its own private space or get the DOE to provide them their own building.

Sixteen members of the public spoke in favor of the proposal, stating that Girls Prep is a high-quality choice for families in District 1 and the community. The quality of education that has been given to the students of Girls Prep should be expanded.

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

A total of five written comments and one oral comment regarding this proposal have been received; comments were received from P.S. 188 parents. Three written comments and the sole oral comment were opposed to the proposal; the remaining comments were in support. Those in opposition to the proposal opposed charter schools in general and stated their belief that accommodating Girls Prep has negatively affected P.S. 188 students. In opposing the proposal, these commenters noted the following: (1) the siting of Girls Prep in the building has resulted in Kindergarten students' lunch being pushed to 12:20; (2) safety issues may arise during arrival and dismissal of additional students in M188; and (3) concerns about the sharing of the gymnasium. The comments in support of the proposal noted that an all-girls middle school in District 1 would be a welcomed addition to the middle choice in District 1.

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

Regarding concerns about the sharing of common spaces in the building, the M188 building has a capacity of 1,010 students. With the expansion of Girls Prep, the combined total enrollment of all schools in the building would be still below the capacity of the building.

After Girls Prep's expansion, it will still be possible for all schools to share the gymnasium. The DOE is looking into the possibility of installing gym divider curtains to create a visual and physical separation between two adjacent play areas, which Girls Prep may be able to help fund. The principals of P.S. 188, Girls Prep, and P.S. M094 are also discussing ways to better utilize the space on the first floor, and will get thoughts from the space planner on achieving that goal. In addition the principals of all three schools will work together to develop a schedule around the shared spaces, including the lunch room. The DOE is also investigating the possibility of expanding the lunch room to accommodate more students.

To address the concerns about safety challenges that may arise during arrival and dismissal given the additional students in M188, the DOE has suggested that Girls Prep hire an additional security guard. Also, there are fourteen doors at M188 and principals of P.S. 188, Girls Prep, and P.S. M094 will be discussing a plan to identify separate entrances.

The DOE has also had conversations with the Borough Safety Director to discuss the M188 School Safety Plan (SSP). The SSP is reviewed, modified and developed on an annual basis through an extensive review process, and the SSP at M188 would be modified to account for the additional students. The modified plan would identify additional spaces which would be appropriate for campus shelter-in to meet the new needs of the Campus School Safety Plan. Based on the DOE and the Borough Safety Director's knowledge of the building, we are confident in the ability to develop an appropriate Shelter-In plan for the expected increase in enrollment.

The alternative proposal for Girls Prep to secure private space is not a better alternative. The DOE has provided space to over 60 charter schools in DOE buildings as they are also public schools. Given that there is space in the building where Girls Prep is currently located and Girls Prep is a high performing school that is serving its students very well, the DOE has made no changes to the proposal and will present the proposal 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-A1C4-0F38AC7260E8/75238/M188GirlsPrepEISFinal1810.pdf>.

### **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.

**Prepared by  
Department of Education**