

Public Comment Analysis

Date: March 19, 2013

Topic: The Proposed Co-location of The New American Academy Charter School (84KTBD) in Building K415 with Existing Schools Kurt Hahn Expeditionary School (18K569), It Takes a Village Academy (18K563), and Cultural Academy for the Arts and Sciences (18K629) Beginning in the 2013-2014 School Year

Date of Panel Vote: March 20, 2013

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to co-locate a new public charter school, the New American Academy Charter School (84KTBD, “New American”), which will serve students in kindergarten through fifth grade, in building K415 (“K415”), which is located at 5800 Tilden Avenue, Brooklyn, NY 11203, in Community School District 18, beginning in the 2013-2014 school year. K415 currently houses Kurt Hahn Expeditionary Learning School (18K569, “Kurt Hahn”), It Takes a Village Academy (18K563, “It Takes a Village”), and Cultural Academy for the Arts and Sciences (18K629, “Cultural Academy”). All three existing district high schools serve students in grades nine through twelve. If this proposal is approved, New American will be co-located in K415 with Kurt Hahn, It Takes a Village, and Cultural Academy.

New American is a new public charter school that is authorized by its charter authorizer, The New York State Education Department (“SED”), to serve kindergarten through fifth grades. New American will open with kindergarten and first grade in 2013-2014 and will add one grade each year until it serves students in kindergarten through fifth grade in 2017-2018. The school will admit students via the charter lottery application process, with a preference given to District 18 residents.

According to the 2011-2012 Enrollment Capacity Utilization Report (“Blue Book”), K415 has the capacity to serve a total of 2,118 students. In 2012-2013, Kurt Hahn is serving 279 students in ninth through twelfth grade, It Takes a Village is serving 420 students in ninth through twelfth grade, and Cultural Academy is serving 305 students in ninth through twelfth grade, yielding a building utilization rate of 47%. This means that the building is “underutilized” and has space to accommodate additional students. If this proposal is approved, in 2017-2018, once New American’s kindergarten through fifth grades have fully phased in and the school has reached full scale, New American is projected to serve 340-410 students, Kurt Hahn is projected to serve 260-300 students, It Takes a Village is projected to serve 400-440 students, and Cultural Academy is projected to serve 285-325 students, for a total of 1,285-1,475 students, yielding a building utilization rate of approximately 61%-70%.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding the proposal to co-locate New American in K415 was held on February 20, 2013 at building K415, located at 5800 Tilden Avenue, Brooklyn, NY 11203.

Approximately 200 members of the public attended the hearing and 59 people spoke. Present at the meeting were Brooklyn and Staten Island High Schools Superintendent Aimee Horowitz; Community School District 18 Superintendent Beverly Wilkins; Facilitator Laurie Price of the DOE; Principal of Kurt Hahn Matt Brown; Principal of It Takes a Village Marina Vinitskaya; Principal of Cultural Academy Diane Varano; Community Education Council (“CEC”) 18 President James Dandridge; Citywide Council on High Schools (“CCHS”) representative Monique Lindsay; a representative from SED, Erin Shovlin; New York City Council Member Jumaane Williams; a representative from New York City Public Advocate Bill DeBlasio’s office, Kicy Motley; and a representative from New York City Assemblyman Nick Perry’s office, Vivian Bent. Additionally, Stephen Demers from the DOE was present.

Below is a summary of the comments received:

The following comments and remarks were made or submitted at the Joint Public Hearing on February 20, 2013:

1. James Dandridge of CEC 18 stated that the CEC collectively opposes this proposal.
2. Principal Varano asserted:
 - a. She is supportive of the co-location movement, but not this proposal.
 - b. She is supportive of the schools on the Tilden campus that have worked hard for their success.
 - c. Each school has specialty classes that depend on specific rooms, and there are only three natural barriers in the school.
 - d. She is concerned about the loss of resources.
 - e. This proposal does not address safety if the proposed new school’s students are not scanned by a metal detector prior to coming into the school.
 - f. This proposal does not address the specific rooms that New American will occupy if the co-location proposal is approved.
3. Principal Brown stated:
 - a. In 2006, the campus had a 38% graduation rate. The schools on campus have dramatically changed this.
 - b. He is not opposed to co-locations in general, but he is opposed to this proposal specifically.
 - c. He questioned why wasn’t this community approached about what should be added to the Tilden campus if it was under-utilized?
 - d. He questioned where the new school would be located.
 - e. He questioned how scanning and metal detectors would work.
 - f. He further questioned what programs would be lost as a result of this proposal.
4. Principal Vinitskaya stated:
 - a. She has worked for seven years to build strong schools on campus, which requires space and resources.
 - b. They are working on creating Career and Technical Education programming, but they need more space and resources to build a medical lab and computer labs.
 - c. This proposal will not allow her to expand her school, which is in very high demand.

- d. This proposal doesn't take into consideration the demand of District 18 families, who need college and career ready programs.
5. Monique Lindsay of CCHS expressed:
 - a. Charter schools pit schools against schools, parents against parents, children against children.
 - b. Charter schools should find their own buildings.
6. Council Member Williams asserted:
 - a. He is angry about the DOE's process in proposing co-locations, not about charter schools in general.
 - b. He is against this administration's arrogance that leads to closing schools instead of building up schools.
 - c. Why was an elementary school chosen for this building? What study says that there is greater need for elementary schools than high schools in the district?
 - d. Why aren't high schools in the building being allowed to expand if they have graduation rates near 90%?
 - e. The DOE never asked the principals what they wanted in the building.
 - f. The DOE is prepared to push this proposal through the PEP, we need to be prepared to come up with something they're not ready for.
7. A commenter speaking on behalf of Public Advocate Bill de Blasio stated:
 - a. Why not build on the three great educational options on campus instead of picking them apart and tearing them down?
 - b. Public Advocate de Blasio is calling for a one year moratorium on closures and co-locations because these proposals are reckless and not well thought through.
8. Multiple commenters expressed concern over an elementary school being sited in a building serving high school students.
9. Multiple commenters asked why an elementary school was chosen for this building as opposed to a high school.
10. Multiple commenters expressed opposition for the proposal on the grounds that the co-location would lead to larger class sizes for students at the existing high schools.
11. One commenter asked about the money it will take to renovate bathrooms and the cafeteria for elementary school students.
12. One commenter asserted that by adding another charter school to the building, money is being taken away from district schools. The commenter also submitted a written statement.
13. Two commenters questioned the accuracy of the enrollment projections provided in the EIS and BUP.
14. Multiple commenters stated that the DOE should allow the existing schools to grow instead of adding a new school to the building.
15. Two commenters expressed discontent with New American's public engagement.
16. Multiple commenters stated that they were not opposed to co-location proposals in general, but were opposed to this proposal in particular, while multiple commenters expressed general opposition to the proposal and the DOE's policies.

17. Multiple commenters expressed concern about the impact this proposal will have on the strong academics at the school.
18. Multiple commenters stated that they did not want to lose their sports and athletic programs or facilities as a result of this proposal.
19. Multiple commenters expressed concern about the impact of this proposal on extracurricular programming at the existing schools.
20. Two commenters stated that this proposal would take away resources from the existing schools.
21. Multiple commenters shared discontent with the DOE's engagement process and expressed their desire to see more community engagement.
22. Multiple commenters asserted that this building was not underutilized and one noted that this proposal will result in the building being over capacity.
23. Two commenters stated that the DOE's proposals are racist because the proposals disproportionately target minority communities.
24. Multiple commenters expressed concern over safety in the building as a result of the co-location, especially in light of the kindergarten through twelve grade span in the building.
25. Multiple commenters expressed concern over the lack of space as a result of the proposal.
26. Multiple commenters expressed support for the existing schools and commended their successes.
27. One commenter stated that teachers will be excessed as a result of this proposal.
28. Multiple commenters asked where New American will be located in the building.
29. One commenter asked how much import the community's opinion has in the PEP's decision-making process.
30. One commenter asked if New American will grow beyond K-5.
31. One commenter stated that the district is already going to lose a significant amount of kindergarten through eighth grade students according to a School Construction Authority report. The commenter also submitted a written statement.
32. One commenter stated that this proposal does not help English Language Learners ("ELL") or special education students.
33. One commenter suggested there was no evidence that New American would provide a high quality education for District 18 families. The commenter also submitted a written statement.
34. Multiple commenters expressed their support for the proposal for the following reasons:
 - a. If approved, all schools will be able to work collaboratively.
 - b. At the other school where New American is located, there is hardly any interaction between the schools.
 - c. New American won't take away the existing schools' sports and resources.
 - d. New American has a solid record and has been recognized by public officials.
 - e. Students will be safe if this proposal is approved.

The DOE received a number of comments which do not directly relate to the proposal

35. Mayor Bloomberg is a disaster.
36. Mayor Bloomberg has run the city like a king with total autonomy.
37. Mayor Bloomberg can run a business, but what would he do if he was told that a majority of his businesses would be closed?

38. One commenter is against this administration because it does not consider the community's input.

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

39. One commenter stated the high schools on the campus need the opportunity to grow their enrollment and the proposal will prevent enrollment gains.

40. One commenter expressed concern over an elementary school being sited in a building serving high school students

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

Comments 1, 2 (a), 3(b), 4(d), 5(a), 6(c, g), 7(b) 16, and 23 express general opposition to the proposal.

We understand that there may be members of the community that do not support this proposal, however, there is a need for increased options for students in Brooklyn, including those students residing in District 18. 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. Building K415 is currently underutilized. This means that the space in the building is not being used as effectively as possible and could be used to create new educational opportunities for District 18 families.

Comments 34 (a, b, c, d, e) are supportive of the proposal and do not require a response.

Comments 2(b), 3 (a), and 26 express support for the existing schools at Tilden.

The DOE recognizes and commends the success of the existing schools located on the Tilden campus. All three schools will be able to continue to provide the academic and extracurricular experiences they currently provide to their students if this proposal is approved, however those programs may be configured differently. 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. That is true for all City students as all schools annually modify extracurricular offerings based on student demand and available resources.

Comments 2 (c), 4(a, b), and 25 concern the availability of space for the existing and proposed schools at K415, and question 2(f), 3(d), and 28 asks where the school will be located in K415.

If this proposal is approved, the Office of Space Planning will work closely with the Building Council, consisting of the three principals of the co-located organizations in K415 in addition to the leader of New American Academy, to create space configurations within the K415 building to accommodate the co-location of New American in order to maintain a positive learning environment for all students, staff, and administration at all school organizations. The DOE, in consultation with the Building Council, will, where possible, allocate contiguous and dedicated space to schools. As explained in the BUP, all schools will maintain access to shared spaces and all co-located schools will receive their baseline space allocations in accordance with the Citywide Instructional Footprint (the "Footprint"), which guides space

allocation and use in City schools. At this point, the DOE has not made a specific determination as to what specific rooms New American will occupy if this proposal is approved; that decision will be made collaboratively by the Building Council in conjunction with the Office of Space Planning.

In the case of K415, once New American is at full scale in 2017-2018, Kurt Hahn is expected to receive 4 full-size rooms above its baseline footprint, It Takes a Village is expected to receive 7 full-size rooms above its baseline footprint, Cultural Academy is expected to receive 5 full-size rooms above its baseline footprint, and New American is expected to receive 5 full-size rooms above its baseline footprint. Therefore, the DOE believes there is ample space to house all four organizations in K415.

Comments 2 (d) and 20 suggest that resources will not be provided to the schools at Tilden as a result of this proposal and in general.

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.

The DOE acknowledges that budget cuts have impacted schools across the City, but budget cuts have not disproportionately impacted schools. For example, in 2010-2011, individual school budgets Citywide were cut by an average of 4%. It should be noted that principals have discretion over their budget and make choices about how to prioritize their resources.

Comments 2(e), 24 relate to safety on campus if this proposal is approved, and comments 2(e) and 3(e) relate to scanning or metal detectors.

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. 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 School Safety Plan is evaluated by NYPD for certification. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

Additionally, the Borough Safety Director will assist the campus principals with any safety concerns, internally and externally, and will provide additional support when available.

The Office of Safety and Youth Development (“OSYD”) will regularly monitor the campus schools’ DOE incident data and the NYPD building crime data for spiking trends. When there is evidence of

spikes in incidents and crime, OSYD will schedule a review of the data with representatives from all the co-located schools and follow up with a safety walk or a full comprehensive safety assessment to identify areas of concern and re-establish safety and security systems for the campus, as appropriate.

In regards to the school being a scanning campus with metal detectors and the elementary school students not having to go through the scanners as they enter the school, it is the current NYPD policy that students enrolled in grades kindergarten through five, whether in a district school or a public charter school, do not have to go through scanning. Adults visiting New American would be required to enter through scanners. Multiple schools across the city abide by this policy and have maintained safety on campus. The DOE believes that similar to these other scanning campuses with elementary and upper-grade co-locations safety will be maintained on the Tilden Educational Campus.

Comment 3(c) and 29 suggest that the community's input will not be considered by the DOE prior to approving this proposal.

The DOE's public review process is governed by Chancellor's Regulation A-190. The DOE met with principals, School Leadership Teams ("SLT"), and CEC Leadership and gathered their feedback. Also included in this process is a joint public hearing in which public comment is collected, analyzed, and then provided to the Panel for Educational Policy before the Panel votes on a proposal. The DOE also solicits community feedback via phone, email, and the DOE web site until 24 hours prior to the PEP vote. The Panel for Educational Policy is an independent body that takes this public comment into consideration when making decisions.

Comment 4(c), 6(d), 7(a) 14 and 39 relate to the desire to expand enrollment at the existing schools on the Tilden campus instead of adding another school.

There are currently hundreds of schools in buildings across the City that are co-located; some of these co-locations are multiple DOE schools while others are DOE and public charter schools sharing space. In all cases, allocation of classroom, resource, and administrative space is guided by the Footprint, which is applied to all schools in the building.

Nothing leads the DOE to believe that the proposed co-location will have an impact on Kurt Hahn, It Takes a Village, or Cultural Academy's enrollment. The enrollment projections in the EIS are based on current enrollment at Kurt Hahn, It Takes a Village, and Cultural Academy at the entry point grade level, and assume that the same number of students will age up and that there will be stable incoming enrollment at the entry point grade. In addition, the DOE notes that all schools will receive additional full-size spaces above its Footprint allocation for the 2013-2014 school year and beyond if the proposal is approved.

The DOE will closely monitor any changes in Kurt Hahn, It Takes a Village, and Cultural Academy's demand. Enrollment for each school will be carefully evaluated annually to ensure that appropriate seat targets are established on an annual basis.

If any schools' enrollment were to increase, the other schools in the building will continue to receive their respective baseline Footprint allocations of rooms.

Comment 5 (b) expresses an opinion that charter schools should have their own buildings.

The DOE seeks to provide space to high quality education options for all students, regardless of whether they 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 schools where it is feasible to do so. The DOE does not lease space directly for charter schools; a charter school interested in parochial school space would have to acquire or lease that space with private funds.

Comments 6 (a, e) and 21 relate to the DOE's community engagement process.

The DOE appreciates all feedback from the community regarding a proposal. Prior to the proposal posting, the DOE met with principals and CEC Leadership. When the EIS and BUP for this proposal were issued, they were made available to the staff, faculty and parents at the impacted schools, on the DOE's Web site, and in each school's respective main office. In addition, the DOE dedicated a proposal-specific website, voicemail and email address to collect feedback on this proposal. Furthermore, all schools' staff, faculty, and parent communities were invited to the Joint Public Hearing to provide further feedback.

Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE believes that if this proposal is approved the school communities at Kurt Hahn, It Takes a Village, and Cultural Academy will be able to create productive and collaborative partnerships.

Comments 8 and 40 relate to the co-location of an elementary school with high school students and comments 6(c) and 9 specifically comment on the decision to site an elementary school over a high school.

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 students, specifically elementary school students in District 18. Approximately 48% of all students currently enrolled in all District 18 elementary schools are enrolled in schools that received a C or D on their 2011-2012 Progress Report.

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:

- The Julia Richman Educational Complex, which houses four small high schools, a K-8 school, and a District 75 program;
- Building M113 currently houses three schools: STEM Institute of Manhattan, a district elementary school, Harlem Success Academy 4, a charter elementary school, and Opportunity Charter School, which serves sixth through twelfth grade in District 3;
- 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 grades nine through twelve.

- Building K324 currently houses three schools: M.S. 267, an existing middle school serving students in grades sixth through eight, 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.

Comment 10 suggests that class sizes would increase as a result of this proposal.

As part of the methodology for developing each school's Footprint as outlined in the Building Utilization Plan ("BUP"), the DOE assumes that enrollment will remain constant at the four existing schools in K415 and plans accordingly. Therefore, Kurt Hahn, It Takes a Village, and Cultural Academy will not have to program larger class sizes as a result of space constraints. Programmatic decisions, such as the number of sections a school programs, is ultimately up to the discretion of a school's principal and administration. Thus, the DOE does not anticipate that class sizes would increase at any of the existing schools and the BUP accounts for each school to continue to program the same number of sections it has in the past. Additionally, Kurt Hahn, It Takes a Village, and Cultural Academy will receive additional rooms above their baseline Footprint allocation of rooms in each year of this proposal.

Comment 11 suggests that it will be costly to upgrade the building in order to accommodate elementary school by renovating facilities.

The DOE does not anticipate that renovations will need to take place in the K415 building as a result of this proposal. With respect to comments concerning the purported need to "retrofit" the Tilden Educational Campus to accommodate New American: There is no "retro-fitting" planned. No bathroom fixtures are being changed for smaller units and no facilities that have been renovated are being remodeled due to this proposal.

Comment 12 regards the financial impact on district schools as a result of opening a new charter school.

This proposal is not expected to impact initial costs or allocations at Kurt Hahn, It Takes a Village, Cultural Academy, or any other district school.

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 General Education Charter School per-pupil rate is based on a formula used for all traditional public school districts. The formula divides the district's Approved Operating Expenditures ("AOE") by Total Allowable Pupil Units ("TAPU"). Special Education funding is an allocation that Charter Schools may qualify for and receive for serving students that receive special education services for more than 20% of the week as mandated by an IEP. Due to this funding formula, the opening of a new charter school does not impact the budgets or allocations of district schools any differently than opening a new district school, as funding "follows the child" pursuant to the Fair Student Funding Formula ("FSF"). Please refer to the Fair Student Funding Guide and Fiscal Year 2013 ("FY13") School Allocation Memoranda for additional information on cost of instruction and how the changes to FSF funding and other school allocations will be impacted as a

result of register changes at Kurt Hahn, It Takes a Village, and Cultural Academy. The FSF Guide is available at:

http://schools.nyc.gov/offices/d_chanc_oper/budget/dbor/allocationmemo/fy12_13/FY13_PDF/FSF_Guide.pdf.

Comment 13 challenges the accuracy of the enrollment numbers in the EIS.

All projections referenced for Kurt Hahn, It Takes a Village, and Cultural Academy for the 2013-2014 school year and beyond reflect the forward promotion of cohorts by grade using the 2012-2013 Unaudited Register (as of October 26, 2012) as the base year. Therefore, this proposal assumes that the schools will receive approximately the same number of students each year and allocates space accordingly. The following table reflects the number of students at each of the existing schools during the current school year and in each year that New American will be phasing in:

DBN	School Name	2012-2013 Enrollment	2013-2014 Projected Enrollment	2014-2015 Projected Enrollment	2015-2016 Projected Enrollment	2016-2017 Projected Enrollment	2017-2018 Projected Enrollment
84KTBD	New American	-	120 - 150	175 - 215	230 - 280	285 - 345	340 - 410
18K563	It Takes a Village	420	400 - 440	400 - 440	400 - 440	400 - 440	400 - 440
18K569	Kurt Hahn	279	260 - 300	260 - 300	260 - 300	260 - 300	260 - 300
18K629	Cultural Academy	305	285 - 325	285 - 325	285 - 325	285 - 325	285 - 325
Total Building Enrollment		1,004	1,065 - 1,215	1,120 - 1,280	1,175 - 1,345	1,230 - 1,410	1,285 - 1,475
Utilization		47%	50% - 57%	53% - 60%	55% - 64%	58% - 67%	61% - 70%

Comment 15 relates to the engagement conducted by New American.

The DOE notes that New American submitted a charter application to SED to open a new charter school in New York City and initially targeted outreach in Community School District 19 in Brooklyn. Once it became apparent that New American would be proposed for co-location in Community School District 18, New American extended engagement to District 18 by meeting with the Community Education Council and elected officials in District 18.

Comment 17 expresses concern about the impact on academics at the schools on the Tilden campus, while comments 3(f), 18 and 19 express concerns about programming, including athletic programming.

As stated in the EIS, the proposed co-location is not expected to impact instructional programming or extracurricular activities of the schools currently co-located in the building. This includes athletic programming and access to athletic facilities, such as the field house. Although there will be an additional school organization in the building, all schools will still have access to shared spaces in proportion to their school’s enrollment, as outlined in the shared space schedule in the BUP. All sports teams, therefore, are expected to continue operating as they are now. The Building Council, comprised of all of the principals of the co-located schools, will determine the final shared space schedule.

Comment 22 asserts that K415 is not an underutilized building.

According to the 2011-2012 Enrollment Capacity Utilization Report (“Blue Book”), K415 has the capacity to serve a total of 2,118 students. In 2012-2013, Kurt Hahn is serving 279 students in ninth through twelfth grade, It Takes a Village is serving 420 students in ninth through twelfth grade, and Cultural Academy is serving 305 students in ninth through twelfth grade, yielding a building utilization rate of 47%. This means that the building is “underutilized” and has space to accommodate additional students. Furthermore, the utilization rate for building K415 is outlined in the chart below for each year of the proposed phase-in of New American:

DBN	School Name	2012-2013 Enrollment	2013-2014 Projected Enrollment	2014-2015 Projected Enrollment	2015-2016 Projected Enrollment	2016-2017 Projected Enrollment	2017-2018 Projected Enrollment
84KTBD	New American	-	120 - 150	175 - 215	230 - 280	285 - 345	340 - 410
18K563	It Takes a Village	420	400 - 440	400 - 440	400 - 440	400 - 440	400 - 440
18K569	Kurt Hahn	279	260 - 300	260 - 300	260 - 300	260 - 300	260 - 300
18K629	Cultural Academy	305	285 - 325	285 - 325	285 - 325	285 - 325	285 - 325
Total Building Enrollment		1,004	1,065 - 1,215	1,120 - 1,280	1,175 - 1,345	1,230 - 1,410	1,285 - 1,475
Utilization		47%	50% - 57%	53% - 60%	55% - 64%	58% - 67%	61% - 70%

As this table demonstrates, K415 is expected to have a utilization rate of approximately 61%-70% once New American reaches full scale by 2017-2018, and will therefore remain underutilized.

Comment 27 argues that teachers will be excessed as a result of this proposal.

As discussed in the EIS, the proposed co-location of New American in K415 is not expected to change the number of personnel positions assigned to Kurt Hahn, It Takes a Village, or Cultural Academy, nor is it expected to significantly alter the duties of current staff in K415.

Comment 30 asks if New American will grow beyond fifth grade in the building.

New American has only been authorized by its charter authorizer, SED, to serve kindergarten through fifth grade students. This proposal would only allow New American to open and serve K-5th grade students in K415 at full scale. In the future, if New American chooses to expand, it would first have to apply to expand its charter from its charter authorizer, SED, and that revision to its charter would have to be approved by SED.

Comment 31 references a report from the School Construction Authority about the district losing a significant number of kindergarten through eighth grade students.

As stated previously, approximately 48% of all students currently enrolled in all District 18 elementary schools are enrolled in schools that received a C or D on their 2011-2012 Progress Report. Therefore, regardless of enrollment patterns, there is a need for more high quality elementary schools serving District 18 students. Moreover, while the School Construction Authority (“SCA”) Demographic Report cited by the commenter does show K-8 enrollment declining due to demographic changes in the district, that change is slight. Between 2012-2013 and 2018-2019, K-8 enrollment is only expected to decline by 87 students. That report can be found on SCA’s website here:

<http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Demographics/2009-2018StatisticalForecastingReport.pdf>.

Comment 32 relates to the impact this proposal will have on special populations, such as ELL students and special education students.

The DOE does not expect this proposal to impact students from special populations, such as ELL and special education students. All current and future students enrolled at the existing schools in K415 will continue to receive mandated special education and/or ELL services if this proposal is approved.

Comment 33 states that there is no evidence that New American will be a high quality option.

The DOE supports parent choice and strives to ensure that all families have access to additional educational options that meet their children’s needs – New American would be an additional option for families in the district. The proposal to establish the New American Academy Charter School was submitted to SED in response to the SED’s Request for Proposals. After submitting the application, New American underwent a rigorous review process with the authorizer, which included capacity interviews and an application hearing. SED runs independent, rigorous processes intended to only authorize those

schools that demonstrate capacity to deliver a strong instructional program that is operationally and fiscally sustainable and is likely to result in positive outcomes for students. In November 2012, based on its reviews and findings, SED authorized New American to open in Brooklyn in September 2013, which demonstrates that SED anticipates that New American will provide a strong instructional program.

Changes Made to the Proposal

No changes were made to this proposal.