

Public Comment Analysis

Date: May 17, 2011

Topic: The Proposed Expansion of the Co-location of Democracy Prep Charter School (84M350) with Existing School P.S. 197 (05M197) John B. Russwurm in Building M197

Date of Panel Vote: May 18, 2011

Summary of Proposal

On February 18, 2011, the New York City Department of Education (“DOE”) proposed to extend and expand the co-location of Democracy Prep Charter School (84M350, “Democracy Prep”), an existing public charter school that serves 495 students in grades six through ten and which is currently split-sited between Building M197, located at 2230 5th Avenue, New York, NY 10037 in Community School District 5 (“M197”), and private space located at 207 West 133rd Street, New York, NY, 10030, also in Community School District 5. In M197, Democracy Prep is co-located with P.S. 197 John B. Russwurm (“P.S. 197”), an existing DOE zoned elementary school serving grades kindergarten through five, which also offers a pre-kindergarten program. 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.

On April 27, 2011, the DOE published a revised Building Utilization Plan (“BUP”), which was annexed to a revised Educational Impact Statement (“EIS”). The revised BUP made the following changes:

- The proposed shared space schedule on page 8 was adjusted and the DOE clarified the rationale for the amount of time that each co-located school is allocated in the shared spaces under the proposal.
- The EIS and BUP reflect the potential for facility upgrades to the basement of M197 in order to provide Democracy Prep with its full baseline allocation of space.

The EIS was updated to reflect the changes to the BUP.

When Democracy Prep began its co-location in M197 in 2009-2010 with sixth grade, the DOE committed to re-evaluate the space available in M197 annually to determine if there was sufficient space to enable Democracy Prep to continue co-locating in M197. Democracy Prep currently serves sixth and seventh grades in M197. Under this proposal Democracy Prep would also serve eighth grade in M197 and its grades 6-8 would remain permanently in M197.

P.S. 197 is a zoned district elementary school that serves 357 students in kindergarten through fifth grade, and also offers a pre-kindergarten program that enrolls 18 students.

Democracy Prep is an existing public charter school that currently serves students in the sixth through tenth grades. Democracy Prep will add one grade each year until it serves sixth through twelfth grades. If this proposal is approved, Democracy Prep's current seventh grade students would remain in M197 as eighth graders in 2011-2012, and in the future all Democracy Prep students in grades six through eight would be co-located in M197. Democracy Prep's grades nine through twelve would be located in the private space on West 133rd Street. Democracy Prep admits students at all grade levels through a lottery and gives preference to students residing in District 5. In 2009-2010, Democracy Prep was the highest rated middle school in New York City on the annual Progress Report.

The M197 building has the capacity to serve 875 students. In 2010-2011, the building only served 594 students, yielding a utilization rate of 68%. Once Democracy Prep has completed its expansion to eighth grade in M197, there would be approximately 645-735 students served in the building by both P.S. 197 and Democracy Prep, yielding a building utilization rate of 74-84%.

The details of this proposal have been released in a revised Educational Impact Statement which can be accessed here along with the revised Building Utilization Plan ("BUP"):
<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/May182011Proposals>.

Copies of the revised EIS and BUP are also available in the main offices of both Democracy Prep Charter School and P.S. 197 John B. Russwurm.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at P.S. 197 John B. Russwurm on March 30, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 300 members of the public attended the hearing and 41 people spoke. Present at the meeting were: Community District 5 Superintendent Gale Reeves; Community Educational Council (CEC) 5 Representatives Ramik Williams, Dianne Johnson and Helena Richardson; P.S. 197 Principal Renardo Wright and School Leadership Team ("SLT") representatives Helena Clay, Antoine Bogard, Cheryl Blue, Stephanie Williams and Lisa Jones; Democracy Prep Charter School Campus Director Elizabeth Greig; and Safiyah Raheem, the Community Liaison for New York City Councilmember Inez E. Dickens.

An additional public hearing regarding the revised proposal was held at P.S. 197 John B. Russwurm on May 16, 2011. At the hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing and 18 people spoke. Present at the meeting were: Community District 5 Superintendent Gale Reeves; Community Educational Council (CEC) 5 President Dianne Johnson and representatives Elizabeth Porter and Helena Richardson; P.S. 197 Principal Renardo Wright and School Leadership Team ("SLT") representatives Dawn Anderson (Chairperson), Antoine Bogard, and

Cheryl Blue; and Democracy Prep Charter Principal Seth Andrew and SLT representative Linda Jones Easton.

The following comments and remarks were made at the joint public hearings:

1. CEC 5 representative Ramik Williams expressed his opposition to the proposal and asked the DOE to reconsider its decision.
2. CEC 5 representative Dianne Johnson noted that everyone in the public was there to ensure that all kids are given access to good education.
3. P.S. 197 SLT representative Helena Clay noted that the School Leadership Team has been discussing the co-location proposal and conveyed that ultimately, it is the parents' choice to decide what school they're going to send their children to. She also expressed her concern over perceived inequity in resource allocation and funding in general. For example, she asserted that Democracy Prep gets full access to the music room since P.S. 197's music program was cut due to budget.
4. Democracy Prep Charter School Campus Director Elizabeth Greig noted that P.S. 197 and Democracy Prep have worked well together and expressed excitement about both schools growing. She also pointed out how polite and respectable the commenters were and noted that such is reflective of the relationship between the two schools in the building. She also noted that Democracy Prep tries hard to be accommodating to P.S. 197. For example, to avoid a gym schedule conflict, the students from Democracy Prep walk across the building to do mandatory gym in that space and they teach students in hallways, in front of bathrooms and on stairwells.
5. Marjorie Stamberg from the United Federation of Teachers ("UFT") expressed her opposition to the proposal. She stated that charter schools are private interests that care about business and not education. She also blamed the DOE and the Bloomberg administration for pitting community members against each other.
6. Helena Richardson, the PTA president at P.S. 197, stated that she was proud to see a large turnout at the hearing since ultimately, it should be the parents that make the choices, not the mayor, or the principals or the schools. She also asserted that there is violence at the school.
7. Principal Emmanuel George from Democracy Prep Harlem addressed what he characterized as the misperceived notions regarding charter schools. He mentioned that students with IEPs account for ¼ of the school's population. Furthermore, he stressed that Democracy Preps also use public funds and sharing of space occurs throughout the City.
8. A commenter expressed her opposition to the proposal, asserting that Democracy Prep came into the building and took resources from P.S. 197. She also mentioned that P.S. 197 accepts all students.
9. A commenter addressed previous comment regarding district schools not having lotteries and pointed out that High School Admissions is also a lottery system. She also emphasized the importance of choice in education.
10. A commenter asserted that the co-location has caused the class size at P.S. 197 to go up, citing that in first grade classes, there are 31 students. He also accused the DOE of cutting P.S. 197's budget twice to make space for Democracy Prep.

11. A commenter noted that since the building is underutilized, if Democracy Prep is not using the building, then another school would take its place; so the best choice is to work with the school that P.S. 197 already has a good relationship with.
12. A commenter expressed her opposition to the proposal, citing that P.S. 197 is an elementary school and that junior high school kids should not share the building with elementary school students.
13. A commenter asserted that P.S. 197 is overcrowded and noted that Democracy Prep's parent involvement is much larger than P.S. 197's.
14. Multiple commenters expressed support for the proposed expansion. Reasons given were:
 - a. Democracy Prep's parents, faculty and students noted that the school;
 - i. Is a safe environment that provides great education for all students.
 - ii. Is a public school that deserves public space.
 - iii. Provides additional choice for the families in the community.
 - iv. Has been a good neighbor to P.S. 197 for the past two years.
 - v. Shares similar vision and value as P.S. 197.
 - b. There is space in Building M197 for the proposed expansion.
 - c. Democracy Prep parents, teachers and students addressed the notion that the school does not accept all students, arguing that the charter school accepts students through a lottery process, which does not have application requirements.
15. CEC 5 President Dianne Johnson stated that there should be no charter schools coming in to the building because P.S. 197 needs all the space in the building. She further asserted that:
 - a. Children should not be eating breakfast at 11 am in the morning.
 - b. She asked: What happened to library time? To gym time?
16. P.S. 197 SLT Member Dawn Anderson asked what happened to the building that was being built for the charter school. She asserted that Democracy Prep was taking over P.S. 197's building, and that P.S. 197 has lost teachers.
17. P.S. 197 SLT Member Antoine Bogard stated that P.S. 197 is an A+ school but it is being squeezed out.
 - a. Class sizes have increased dramatically. He stated that he opposes the idea of Democracy Prep co-locating permanently because then P.S. 197 will not be able to make its class sizes smaller.
 - b. Instead, DOE should find empty buildings to put Democracy Prep in.
 - c. Mr. Bogard also asked: Was there any hearing to discuss Co-location when Democracy Prep was first sited in M197? Is this proposal feasible 6 months prior to September before extension and expansion of the school?
18. A commenter stated that PS 197 is the best elementary school in District 5 and deserves support and should be allowed to grow.
19. A commenter asked why the EIS states that it was not legally required and asserted that the DOE is not in compliance with the law because there cannot be a PEP vote in May for a co-location for September. He also asserted that Democracy Prep is not a public school when it comes to zoning and local land use regulations and should be treated like a private entity. He asserted that parents should bring a lawsuit against Democracy Prep.
20. A commenter said he has been teaching at P.S. 197 for 11 years. He asserted that the art and music program at the school has been disbanded. He also said that Democracy Prep originally said it would be out of P.S. 197 in one year, and it did not keep its word.

21. A commenter stated that P.S. 197 is the best school in District 5 and parents should unite to fight against this co-location and against the privatization of public schools because if parents do not fight back there will be no more public schools.
22. A teacher at P.S. 197 asserted that the school already has been adversely affected by the location because their classes are overcrowded and their class sizes are large.
23. A teacher at P.S. 197 stated that P.S. 197 means a lot to the community and is the best school in District 5.
24. A commenter stated that her son started with 20 kids in class, and class sizes then went up to 32 students. She therefore does not support the co-location of Democracy Prep.
25. A commenter stated that Democracy Prep should get its own building because P.S. 197 is already overcrowded.
26. A commenter stated that Democracy Prep said it would move into its own building, and it should not stay at P.S. 197 because P.S. 197 needs more space.
27. A commenter stated that Principal Wright has done many great things to make P.S. 197 a high performing school, and success has been collective.
28. A commenter asserted that class sizes at P.S. 197 have been getting larger and larger, and expressed the opinion that the Mayor is trying to undercut public schools by giving them larger class sizes and then putting in charter school to get rid of the community schools. The commenter also stated that it is not safe for middle school kids to be around elementary school kids.
29. A commenter stated that her child was turned away from pre-kindergarten because it was full. She also asserted that class sizes at P.S. 197 should be smaller.
30. The parent coordinator at PS 197 stated that P.S. 197 has gone from a school in need of improvement to one that is setting an example for other schools. Actions of the DOE should be about the betterment of the entire school; Democracy Prep should be building their own school in their own space.
31. A social worker at P.S. 197 stated that it is not safe for elementary school students to have middle school students in the building. Also stated that Democracy Prep students are out in streets, blocking the exit of the school and scaring the community, so Democracy Prep needs to leave the building.
32. A CEC member with a child at P.S. 197 stated that leadership needs to make sure that students are happy at 197 and that the safety needs of the students are met.

The DOE received a comment at the Joint Public Hearing that did not directly relate to the proposal and therefore will not be addressed.

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

33. A commenter expressed her opposition to the proposal for the following asserted reasons:
 - a. The plan proposes to take four more classrooms from P.S. 197
 - b. P.S. 197's grade went from a "A" to a "B" after Democracy Prep moved into the building
 - c. P.S. 197 lost several good teachers because they had to give up classrooms
 - d. Dismissal at Building M197 is a disaster due to the behaviors of Democracy Prep students and staff
 - e. Democracy Prep has less passing students than P.S. 197
 - f. P.S. 197 students have to eat lunch at 10:30 am

- g. Democracy Prep should seek alternate options such as moving into a “D” rated schools.

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

Comments 4, 7, 9, 11, 14 are in favor of the co-location and do not require a response.

Comment 1 expresses general opposition to the co-location. The DOE believes that the revised EIS adequately sets forth the reasons why the proposed co-location should go forward.

Comment 2 does not directly relate to this proposal and does not require a response.

Comments 3 and 10 concern the purportedly unequal resources and funding allocation for Democracy Prep and P.S. 197 and P.S. 197’s budget cuts.

The basic operating budget for P.S. 197 is determined by the same Fair Student Funding (“FSF”) formula used at all other New York City District public schools. Under FSF, schools receive City tax levy funding on a per pupil basis. This means that the more students enrolled at a school, the more money a school receives. Each student receives a per-pupil allocation based on the grade level of the student. FSF allocations are subject to annual variation, but for 2010-2011, the base per-pupil allocation for elementary schools was \$4,059.71. In addition, FSF awards supplemental allocations on a per-pupil basis for students who have additional needs and therefore cost more to educate. At the elementary level, supplemental funds are awarded for each student who is an English Language Learner, who requires special education services, or who is eligible for free or reduced-price lunch. For example, during the 2010-2011 school year, elementary schools received an additional \$1,623.00 per pupil for each English Language Learner they enrolled. In the case of students who fall into more than one of these categories, schools are awarded supplemental funding to meet all of those needs. P.S. 197 also receives federal Title I funding based on the proportion of low-income students it enrolls. P.S. 197 is also budgeted to meet the needs of its special education students as defined by their Individualized Education Plans (“IEPs”).

FSF covers basic instructional expenses and FSF funds may, at the school’s discretion, be used to hire staff, purchase supplies and materials, or implement instructional programs. As the total number of students enrolled grows, the overall budget will increase accordingly, allowing the school to meet the instructional needs of its larger student population. Similarly, if the total number of students enrolled falls, the budget shrinks accordingly, as the school will need fewer supplies and potentially a smaller staff. Therefore, as enrollment at P.S. 197 has decreased from 572 students in 2006-2007 to 375 students in 2010-2011, its budget has shrunk accordingly.

Charter schools receive public funding 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. Moreover, whereas many charter schools raise private funds to supplement public funds received pursuant to the state legislature’s formula, Democracy Prep runs its core operations on public

funds, and uses private philanthropy to cover facilities costs for private space for its high school grades.

Comment 3 asserts that Democracy Prep gets full access to the music room because P.S. 197's music program was cut due to budget. **Comment 20** asserts that art and music were cancelled at P.S. 197 due to budget.

P.S. 197's budget is discussed above. The principal decides which programs and classes to offer and which programs and classes to cut when a school's budget shrinks because of decreased enrollment. Democracy Prep does not use a dedicated "music room" in building M197.

Comment 5 asserts that charter schools are private interests that care about business and not education and **Comment 19** asserts that Democracy Prep is a private entity, not a public school.

Charter schools are public schools, and 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.

Comment 6 asserts that there is violence in M197 and **Comment 32** concerns the safety of P.S. 197 students.

The number of suspensions at P.S. 197 has fallen from 5 Principal Suspensions and 6 Superintendent Suspensions in 2006 to 1 Principal Suspension and 4 Superintendent Suspensions in 2010. Moreover, in the 2009-2010 NYC School Survey Report, 57% of parents answered that they Strongly Agreed, and 42% of parents answered that they agreed with the statement "my child is safe at school."

Comments 8, 13, 15, 16, 17, 25, 26, 33(a) concern space allocation in building M197.

Space in DOE school buildings is allocated pursuant to the Citywide Instructional Footprint. The Footprint sets forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school, the school's enrollment, and the number of classes per grade.

In 2010-2011, P.S. 197's adjusted baseline allocation is 20 full size classrooms, but P.S. 197 uses 24 full size classrooms. In 2011-2012 and beyond, P.S. 197 will be allocated 20 full size classrooms. According to the 2009-2010 Room Survey for P.S. 197, in 2009-2010 P.S. 197 described the following uses for full-size classrooms in excess of programmed class sections and cluster rooms: Occupational Therapy, resource room, save/suspension room, speech and academic intervention services. These functions do not require full-time full-size classrooms. As a result, the DOE does not believe that P.S. 197's instructional or programmatic capabilities will be affected by the proposal. There are many schools in District 5 and in P.S. 197's support network which can be models to help P.S. 197 adjust its scheduling to deliver its programming in fewer class spaces.

Comment 8 asserts that P.S. 197 enrolls all students, whereas Democracy Prep holds a lottery.

Charter schools run a lottery in order to admit students fairly if the number of students who apply for admission to a class is greater than the number of seats available in that class. Therefore, if Democracy Prep received only 110 applications for its sixth grade in 2011-2012, it would not need to run a lottery and would accept all students who applied. Only if more than 110 students apply to the sixth grade class would Democracy Prep need to run a lottery to determine which 110 applicants would be admitted.

Similarly, zoned schools also run a lottery if they have more available kindergarten seats than zoned kindergarten students and are able to accept out-of-zone students. If the number of out-of-zone students who apply to the zoned school is greater than the number of seats available, the zoned school runs a lottery to determine which out-of-zone students are admitted.

Comment 10, 17(a), 22, 24 and 28 concerns class sizes at P.S. 197.

The size of a class 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 per class section) for each grade level. The size of a class at each school is generally not determined by the number of classrooms available in a building. The DOE's target class size is 20 students per class in Kindergarten through third grade and 28 students per class in fourth and fifth grades. P.S. 197 currently serves 357 students in grades Kindergarten through five in 16 class sections. P.S. 197 also serves 18 students in 1 section of pre-Kindergarten, for a total of 17 sections. This proposal projects that P.S. 197's enrollment will remain steady and it will continue to serve students in 17 total sections. Therefore, the proposal should not cause any increase in class sizes at P.S. 197.

Comment 12, 28, 31, and 32 assert that junior high school students should not share a building with elementary school students.

Many DOE campuses serve students in grades K-8 in the same building. Other district five elementary schools that are co-located with middle schools include P.S. 92, P.S. 30, and P.S. 194. The successful operation of other K-8 buildings has led the DOE to conclude that the proposed co-location expansion can be successfully managed.

Comment 13 concerns parent involvement at Democracy Prep and P.S. 197.

One of the benefits that public charter schools bring to our public education system is their commitment to involving parents in school culture and school life.

Comment 15(a) and 33(f) assert that P.S. 197 students have to eat lunch at 10:30 or 11am

P.S. 197's regular school day begins at 8am. During the 2010-2011 school year, P.S. 197's first lunch period begins at 10:42am. This is the schedule that was agreed upon collaboratively by the Building Council. The revised Building Utilization Plan proposes the same start time for P.S. 197's first lunch period for next year.

Comment 15(b) suggests that P.S. 197 students will no longer have time in the library or gym

The revised Building Utilization Plan published on April 27, 2011 contains a proposed shared space scheduled. This proposal allocates time the library to P.S. 197 between 8am and 12pm each day. It also proposes that P.S. 197 receive 20 hours in the gym weekly, compared to 10 hours in the gym each week for Democracy Prep. The final shared space schedule will be prepared by the Building Council, which includes a representative from P.S. 197.

Comments 16, 17(b) and 30 suggest that Democracy Prep should move into its own empty building or into private space.

Given the finite number of buildings available in New York City, the DOE attempts to use all of its school buildings as efficiently as possible. The DOE believes that Democracy Prep provides a high-quality option for New York City public school children, and so has proposed to provide Democracy Prep with space in an underutilized public school building. Co-location is therefore very common in New York City schools, as there are not sufficient school buildings to allow each school organization to operate its own building. A co-location means that two or more school organizations are located in the same building. While they share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students' use. The particular space that has been and will be allocated to P.S. 197 and Democracy Prep is discussed elsewhere in this document.

Comment 16 and 33(c) assert that P.S. 197 lost several teachers because it had to give up classrooms.

Pursuant to the Footprint, P.S. 197 is allocated one full size room for each section of students it serves, plus 3 full size cluster rooms and 2 half size resource rooms. The expectation is that these rooms will be used for art, music, pull-out services, small group instruction, etc. In addition to the 20 full size rooms and 2 half size rooms P.S. 197 is allocated pursuant to its adjusted baseline allocation, P.S. 197 currently operates in an additional 4 full size classrooms. According to the 2009-2010 Room Survey for P.S. 197, in 2009-2010 P.S. 197 described the following uses for full-size classrooms in excess of programmed class sections and cluster rooms: Occupational Therapy, resource room, save/suspension room, speech and academic intervention services. These functions do not require full-time full-size classrooms. There are many schools in District 5 and in P.S. 197's support network which can be models to help P.S. 197 adjust its scheduling to deliver its current instructional programming in fewer class spaces.

Comment 17(c) asks if a Joint Public Hearing was held when Democracy Prep was initially proposed to be sited in M197.

At the time that Democracy Prep was originally proposed to be sited in M197, the Joint Public Hearings currently required by Chancellor's Regulation A-190 were not legally required.

Comments 18, 21, 23 and 27 state that P.S. 197 is a great school and the best school in District 5.

The DOE recognizes the success and accomplishments of P.S. 197 and also recognizes the community support that the school enjoys. The proposal to permanently site grades 6-8 of

Democracy Prep in M197 is not meant as a punitive measure against P.S. 197 and should not be taken as such by the community. Instead, it is based on the presence of available space in M197.

Comment 19 asks why an EIS is not legally required for this proposal and asserts there cannot be a PEP vote in May for a co-location for September.

The co-location of grades 6-7 of Democracy Prep in M197 was previously approved, and thus did not require a new EIS. However, the newly proposed expansion and extension of the co-location does require an EIS and approval by the PEP. State law requires that proposed co-locations be issued more than six months prior to the start of the school year in which they are to take effect. The expansion and extension of the Democracy Prep co-location in M197 was originally proposed in February 2011, more than six months before the start of the 2011-12 school year. Thus, the timing of the proposal was consistent with state law.

Comments 20 and 26 assert that the co-location in M197 was initially only supposed to last for one year.

When Democracy Prep began its co-location in M197 in 2009-2010 with sixth grade, the DOE committed to re-evaluate the space available in M197 annually to determine if there was sufficient space to enable Democracy Prep to continue co-locating in M197. The DOE has undertaken this evaluation and determined that there is sufficient space in M197 for Democracy Prep to site its sixth through eighth grades in the building.

Comment 29 states that the commenter's son did not get into the pre-kindergarten program at P.S. 197 because the program was full.

The DOE's pre-kindergarten programs are maintained based on available funding and student enrollment. Full details of the Pre-Kindergarten application process and priorities are available at <http://schools.nyc.gov/ChoicesEnrollment/PreK/default.htm>. The Pre-Kindergarten Directory is updated annually.

Comments 31 and 33(d) asserts that dismissal in Building M197 is a problem due to the behaviors of Democracy Prep students and staff.

Regular school hours for P.S. 197 are 8:00am to 3:00pm. Democracy Prep's school day (including extended day) goes until 5:15pm or 6:16pm. Therefore, Democracy Prep students are not dismissed at the same time as students at P.S. 197. While there can be occasional incidents involving students from any school, the DOE is unaware of any regular dismissal-time incidents involving Democracy Prep students.

Comment 33(b) asserts that P.S. 197 went from an "A" to a "B" after Democracy Prep moved into the building. P.S. 197's overall progress report scores have varied in the past 5 years. In 2006-2007, P.S. 197 received a "B"; in 2007-2008 it received a "C"; in 2008-2009 it received an "A"; in 2009-2010 it received a "B".

Comment 33(e) asserts that P.S. 197 has a greater number of passing students than Democracy Prep.

This proposal is not based on the performance of either Democracy Prep or P.S. 197. 44% of students at P.S. 197 scored either a level 3 or 4 on the state ELA exam in 2009-2010 (and thus were considered proficient); 50 % of students were proficient in math. 34% of Democracy Prep students were proficient in ELA; 76% were proficient in math.

Comment 33(g) suggests that Democracy Prep move into a “D” rated school.

The proposal to permanently site grades 6-8 of Democracy Prep in M197 is not based on the performance of P.S. 197, but on available space in M197.

Changes Made to the Proposal

On April 27, 2011, the DOE published a revised Building Utilization Plan (“BUP”), which was annexed to a revised Educational Impact Statement (“EIS”). The revised BUP made the following changes:

- The proposed shared space schedule on page 8 was adjusted and the DOE clarified the rationale for the amount of time that each co-located school is allocated in the shared spaces under the proposal.
- The EIS and BUP reflect the potential for facility upgrades to the basement of M197 in order to provide Democracy Prep with its full baseline allocation of space.

The EIS was updated to reflect the changes to the BUP.