

BUILDING UTILIZATION PLAN

INTRODUCTION

As described in greater detail in the attached Educational Impact Statement (“EIS”), the New York City Department of Education (“DOE”) is proposing to co-locate grades five through eight of Success Academy Charter School - Bronx 2 (84X494, “SA – Bronx 2”) in building X022 (“X022”) beginning in the 2014-2015 school year. If this proposal is approved, SA – Bronx 2 will be co-located in X022 with J.H.S. 22 Jordan L. Mott (09X022, “J.H.S. 22”), an existing district middle school that serves students in grades six through eight, and Bronx Writing Academy (09X323, “Bronx Writing”), an existing district middle school that also serves students in grades six through eight. 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.

SA – Bronx 2 is an existing public charter school that currently serves students in kindergarten through third grades in building X055. The Panel for Educational Policy (“PEP”) previously approved a proposal that permits SA – Bronx 2 to serve kindergarten through fourth grades in X055. SA – Bronx 2 is authorized to serve students in kindergarten through fifth grades. The DOE is now proposing to site SA – Bronx 2’s fifth grade in X022, located at 270 East 167 Street, Bronx, NY 10456 in District 9 beginning in the 2014-2015 school year. If SA – Bronx 2 receives approval from its authorizer (the State University of New York) to expand to serve grades kindergarten through eight, SA – Bronx 2 will then add one grade each year until it reaches full scale in 2017-2018 and serves students in grades five through eight in the building.

Pursuant to the New York Charter Schools Act of 1998 (as amended in May 2010), the following plan outlines the allocation of classrooms and administrative space among SA – Bronx 2, J.H.S. 22, and Bronx Writing. It also includes a proposal for the collaborative usage of shared resources and spaces among the three school organizations, including but not limited to cafeterias, libraries, gymnasiums, and recreational areas, which assures equitable and comparable access to such facilities. Information about the impact on building safety and security, proposed strategies for communication and collaborative decision-making between the co-located schools, and a description of the shared space committee are also included. Please refer to the EIS to which this plan is attached for further information about the co-location.

The final shared space schedule will be collaboratively finalized by the Building Council if the proposal is approved by the PEP.

METHODOLOGY

We have applied the DOE Instructional Footprint (“Footprint”) to all schools and/or programs outlined in this plan to allocate rooms in an unbiased manner, and have divided the remaining space equitably based on the proportion of the total students in the building enrolled by each school and/or program, the instructional and programmatic needs of the co-located schools, and the physical location of the excess space within the building.¹

JUSTIFICATION OF FEASIBILITY AND EQUITABILITY OF CLASSROOM AND ADMINISTRATIVE SPACE ALLOCATION

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 and number of classes per grade. For existing schools, the Footprint is applied to the current number of classes and class size a school has programmed and is confirmed by a walk-through of the building by the Borough Director of Space Planning and the school’s principal.

¹ The Footprint is a tool to be used by all stakeholders in the analysis and assessment of space usage in DOE buildings. Its purpose is to ensure that the space allocation plan for all schools is fair and equitable. In co-location agreements, the parameters outlined in the Footprint should serve as a guideline for making decisions about the allocation of space, while empowering building occupants to make decisions that best meet the needs of all students in the building. The DOE Footprint can be found at: http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

For elementary schools serving grades kindergarten through five (and for all pre-kindergarten programs), the Footprint assumes that classes are self-contained, meaning that each class remains in their homeroom throughout the day except for when they are scheduled for a cluster activity (for example, art) or lunch, recess, etc.

Further, this assumes that at those times the homeroom classroom remains empty. Therefore, the Footprint allocates one full-size classroom for each general education (“GE”) or Integrated Co-Teaching (“ICT”) section and a full size or half-size classroom to accommodate each self-contained (“SC”) special education section served by the school. In addition, schools serving grades kindergarten through five receive an allocation of cluster or specialty classrooms proportionate to the number of students enrolled. These classes can be used at the principal’s discretion for purposes such as art and/or music instruction, among other things.

At the elementary level, cluster classrooms are allocated as follows:

Enrollment	Number of Cluster Rooms
1,251 and up	5
751-1,250	4
251-750	3
151-250	2
0-150	1

For grades six through twelve the Footprint assumes that students move from class to class and that classrooms should be programmed at maximum efficiency. The Footprint allocates one full-size classroom for each GE or ICT section and a full-size or half-size classroom to accommodate each SC section served by the school. The Footprint does not require that every teacher have his or her own designated classroom. Principals are asked to program their schools efficiently so that classrooms can be used for multiple purposes throughout the course of the school day.

The Footprint allocates the number of baseline full-size equivalent (“FSE”) classrooms for student support services, resource rooms, and administrative space based on the grades a school serves and its enrollment at scale.

While the Footprint sets forth a baseline space allocation, school leaders are empowered to make decisions about how to utilize the space allocated to the school. Each principal, therefore, must make decisions about how and where students will be served within the space allocated to the school. The DOE, however, will provide support to the schools to ensure that the schools use the space efficiently in order to maximize capacity to support student needs and maintain appropriate delivery of special education and related services to students. Where appropriate, school leaders will have an opportunity to draw upon the expertise and guidance of the Office of Special Education, which is dedicated to promoting positive educational outcomes for students with disabilities.

Allocation of Classrooms and Administrative Space

According to a building walk-through and survey performed on August 15, 2012 by the Director of Bronx Space Planning, building X022 has a total of 58 full-size rooms² (including two full-size science demonstration rooms), 21 half-size rooms,³ and the equivalent of 3.5 full-size rooms of designed administrative space. The two science demonstration rooms are allocated to individual schools, and therefore are included in the full-size room allocations and are not included in the proposed Shared Space Schedule. X022 also contains two gymnasiums, an auditorium, a cafeteria, a library, and an outdoor play yard. The below spaces are shared spaces or contain building services and will not be included in the allocation of space for any individual school:

- Bronx Works, a community-based organization that provides services to students at both J.H.S. 22 and Bronx Writing, occupies the equivalent of one half-size room of designed administrative space.
- The custodian's office occupies one half-size room.
- The school Safety office occupies one half-size room.
- The School Based Support Team ("SBST") occupies one half-size room.
- The Learning through an Expanded Arts Program ("LeAp") is located in one half-size room.
- The nurse's office is located in the equivalent of one full-size room of designed administrative space.

Excluding the spaces outlined above, the X022 building currently has a total of 58 full-size rooms (including two full-size science demonstration rooms), 17 half-size rooms, and the equivalent of 2.0 full-size designed administrative space remaining that can be allocated to schools.

Summary	FS	HS	Designed Admin (FSE)
Building Grand TOTAL	58	21	3.5
Shared Spaces or Building Services	0	4	1.5
Remaining Total to Be Allocated	58	17	2.0

² Full-size classrooms have an area of 500 square feet or more.

³ Half-size classrooms have an area of less than 500 square feet but greater than 239 square feet.

2012-2013 (CURRENT SCHOOL YEAR)

The table below summarizes the total enrollment and sections served at J.H.S. 22 and Bronx Writing in the current 2012-2013 school year.

School Name	Grade Span	Total Enrollment ⁴	Total GE/ICT Sections	Total SC Sections
J.H.S. 22	6-8	663	24	3
Bronx Writing	6-8	488	18	4

The table below summarizes the Footprint allocations for J.H.S. 22 and Bronx Writing. These allocations are based on the methodology described at the beginning of this document, and the amount of space that each school is currently using. Please note:

- Given the configuration of rooms within X022, the DOE has adjusted the baseline allocation of J.H.S. 22 to include two additional full-size rooms in lieu of two half-size rooms to ensure that J.H.S. 22 is able to operate in a contiguous space.

2012-2013		Non-Admin Spaces		Administrative Spaces			Total Admin (FSE)	Grand Total Current Space Allocation		
		Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms		Total Full-Size Rooms	Total Half-Size Rooms	Designed Admin (FSE)
J.H.S. 22	Baseline Footprint Allocation	25	6	2.0	0	5	4.5	25	11	2.0
	Adjusted Footprint Allocation	27	4	2.0	0	5	4.5	27	9	2.0
	Current Space Allocation	32	4	2.0	0	5	4.5	32	9	2.0
Bronx Writing	Baseline Footprint Allocation	19	7	0.0	3	1	3.5	22	8	0.0
	Current Space Allocation	23	7	0.0	3	1	3.5	26	8	0.0

⁴ J.H.S. 22 and Bronx Writing enrollment figures are based on the 2012-2013 Audited Register (as of October 26, 2012).

In total:

- J.H.S. 22 is currently allocated 32 full-size rooms, 9 half-size rooms, and the equivalent of 2.0 full-size designed administrative rooms. This includes 5 full-size rooms in excess of its adjusted Footprint.
- Bronx Writing is currently allocated 26 full-size rooms and 8 half-size rooms. This includes 4 full-size rooms in excess of its baseline Footprint.

The current excess space in the X022 building is shown in the table below.

2012-2013	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
Space in Excess of Adjusted Baseline Allocations	9	0	0.0

2013-2014

The table below summarizes the total projected enrollment and projected number of sections to be served at each school located in the X022 building in 2013-2014. As described in further detail in Section II of the attached EIS, the enrollment for J.H.S. 22 is projected to decline over the next three years as a result of a previously approved enrollment reduction plan. This enrollment reduction will occur regardless of whether this proposal to co-locate SA – Bronx 2 in the X022 building is approved.

2013-2014	Projected Enrollment⁵	GE/ICT Sections	SC Sections
J.H.S. 22	595 – 625	20	3
Bronx Writing	455 - 485	18	4

In 2013-2014, after J.H.S. 22 and Bronx Writing have received their respective baseline or adjusted baseline Footprint allocations of rooms, the following number of rooms will remain unallocated:

2013-2014	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
Space in Excess of Adjusted Baseline Allocations	13	1	0.0

J.H.S. 22 and Bronx Writing will both receive their respective baseline or adjusted baseline Footprint allocations, as well as excess space. The excess space will be allocated between J.H.S. 22 and Bronx Writing in a manner that allows both schools to maintain contiguous instructional spaces.

The table below summarizes the Footprint allocations for J.H.S. 22 and Bronx Writing. These allocations are based on the methodology described at the beginning of this document, and the amount of space that each school is currently using. Please note:

- The DOE has adjusted the baseline allocation of J.H.S. 22 to include two additional full-size rooms in lieu of two half-size rooms to ensure that J.H.S. 22 is able to operate in a contiguous space.

⁵ The DOE's enrollment figures are based on projections. Significant changes in enrollment could result in an amendment to this plan.

The table below summarizes the full 2013-2014 room allocation plan for J.H.S. 22 and Bronx Writing based on their Footprint allocations, plus the excess space allocations.

2013-2014		Non-Admin Spaces		Administrative Spaces			Total Admin (FSE)	Additional (Excess) Allocation			Grand Total Space Allocation		
		Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms		Additional Full-Size Rooms	Additional Half-Size Rooms	Additional Designed Admin (FSE)	Total Full-Size Rooms	Total Half-Size Rooms	Total Designed Admin (FSE)
J.H.S. 22	Baseline Footprint Allocation	21	6	2.0	0	4	4.0	--	--	--	21	10	2.0
	Adjusted Footprint Allocation	23	4	2.0	0	4	4.0	9	1	0	32	9	2.0
Bronx Writing	Baseline Footprint Allocation	19	7	0.0	3	1	3.5	4	0	0	26	8	0.0

In total:

- J.H.S. 22 will be allocated 32 full-size rooms, 9 half-size rooms, and the equivalent of 2.0 full-size designed administrative spaces. This allocation includes 9 full-size rooms and 1 half-size room in excess of J.H.S. 22's adjusted baseline Footprint.
- Bronx Writing will be allocated 26 full-size rooms and 8 half-size rooms. This allocation includes 4 full-size rooms in excess of Bronx Writing's baseline Footprint.

The proposed room change between 2012-2013 and 2013-2014 is reflected in the table below.

ROOM CHANGE (+/-)	CURRENT 2012-2013 GRAND TOTAL SPACE ALLOCATIONS			PROPOSED 2013-2014 GRAND TOTAL SPACE ALLOCATIONS			YEAR-OVER-YEAR CHANGE (+/-)		
	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
J.H.S. 22	32	9	2.0	32	9	2.0	0	0	0.0
Bronx Writing	26	8	0.0	26	8	0.0	0	0	0.0

2014-2015 (FIRST YEAR OF IMPLEMENTATION)

If this proposal is approved, SA – Bronx 2 will begin serving fifth-grade students in building X022 in the 2014-2015 school year. In addition, as noted earlier, the enrollment at J.H.S. 22 will continue to decline (regardless of whether this proposal is approved).

The table below summarizes the total projected enrollment and projected number of sections to be served at each school in 2014-2015 if this proposal is approved.

2014-2015	Projected Enrollment⁶	GE/ICT Sections	SC Sections
J.H.S. 22	475 – 505	17	3
Bronx Writing ⁷	435 – 465	18	4
SA – Bronx 2	88 – 113	4	0

After J.H.S. 22, Bronx Writing, and SA – Bronx 2 have received their respective baseline or adjusted baseline Footprint allocation of rooms, the following number of rooms will remain unallocated:

2014-2015	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
Space in Excess of Baseline and Adjusted Allocations	7	3	0.0

All three schools in the X022 building will receive their baseline or adjusted baseline Footprint allocations, as well as excess space, which will be allocated between the three schools based upon the following factors: the physical location of the available space in relation to the location of each school within the building and the needs of each school. In particular, the excess space will be allocated to schools in a manner that will allow them to maintain contiguous instructional spaces to the greatest degree possible. The DOE believes that the allocation of space is equitable and comparable given the physical location of the available space in relation to the location of each school within the building and because all of the schools are receiving space appropriate for their needs.

The table below summarizes the full 2014-2015 room allocation plan for J.H.S. 22, Bronx Writing, and SA – Bronx 2 based on their baseline Footprint and adjusted baseline Footprint allocations, plus the excess space allocations.

- As a result of the aforementioned enrollment reduction, J.H.S. 22’s enrollment will decrease and the school’s baseline Footprint needs will decrease by three full-size rooms and one half-size room as compared to the 2013-2014 school year.
- The DOE has adjusted the baseline allocation of J.H.S. 22 to include two additional full-size rooms in lieu of two half-size rooms to ensure that J.H.S. 22 is able to operate in a contiguous space.

⁶ The DOE’s enrollment figures are based on projections. Significant changes in enrollment could result in an amendment to this plan.

⁷ In 2014-2015, the DOE anticipates a slight decline in enrollment at Bronx Writing. Currently, Bronx Writing’s sixth-grade cohort is slightly smaller than the seventh- and eighth-grade cohorts. As this smaller cohort progresses through middle school, and the larger cohorts move on to high school, the overall enrollment at Bronx Writing is expected to decrease slightly. This change in enrollment is expected to occur regardless of whether this proposal to co-locate SA – Bronx 2 in the X022 building is approved and does not have any impact on the number of sections at Bronx Writing nor on the space allocations for that school.

- The DOE has adjusted the baseline allocation of Bronx Writing to include three additional full-size rooms in lieu of three half-size rooms to ensure that Bronx Writing is able to operate in a contiguous space.

2014-2015		Non-Admin Spaces		Administrative Spaces			Total Admin (FSE)	Additional (Excess) Allocation			Grand Total Space Allocation		
		Full-Size Rooms	Half-Size Rooms	Designe d Admin (FSE)	Full-Size Rooms	Half-Size Room s		Additional Full-Size Rooms	Additional Half-Size Rooms	Additional Designed Admin (FSE)	Total Full-Size Rooms	Total Half-Size Rooms	Total Desig ned Admin (FSE)
J.H.S. 22	Baseline Footprint Allocation	18	6	2.0	0	3	3.5	--	--	--	18	9	2.0
	Adjusted Baseline Allocation	20	4	2.0	0	3	3.5	5	3	0.0	25	10	2.0
Bronx Writing	Baseline Footprint Allocation	19	7	0.0	3	1	3.5	--	--	--	22	8	0.0
	Adjusted Baseline Allocation	22	4	0.0	3	1	3.5	1	0	0.0	26	5	0.0
SA - Bronx 2	Baseline Footprint Allocation	5	1	0.0	1	1	1.5	1	0	0.0	7	2	0.0

In total:

- J.H.S. 22 will be allocated 25 full-size rooms, 10 half-size rooms, and the equivalent of 2.0 full-size designed administrative spaces. This allocation is lower than the 2013-2014 allocation because of the aforementioned enrollment reduction at J.H.S. 22 and because the co-location of SA – Bronx 2 will decrease the amount of excess space that is available in the X022 building. This allocation for J.H.S. 22 includes 5 full-size rooms and 3 half-size rooms in excess of J.H.S. 22's adjusted baseline Footprint. These excess rooms have been allocated to J.H.S. 22 in order to ensure that the school can operate in contiguous space.
- Bronx Writing will be allocated 26 full-size rooms and 5 half-size rooms. This allocation includes 1 full-size room in excess of Bronx Writing's adjusted baseline Footprint. This excess space has been allocated to Bronx Writing in order to ensure that the school can operate in contiguous space.
- SA – Bronx 2 will be allocated 7 full-size rooms and 2 half-size rooms. This allocation includes 1 full-size room in excess of SA – Bronx 2's baseline Footprint. This excess space has been allocated to SA – Bronx 2 in order to ensure that the school can operate in contiguous space.

The proposed room change between the 2013-2014 school year and the 2014-2015 school year is reflected in the table below.

ROOM CHANGE (+/-)	PROPOSED 2013-2014 GRAND TOTAL SPACE ALLOCATIONS			PROPOSED 2014-2015 GRAND TOTAL SPACE ALLOCATIONS			YEAR-OVER-YEAR CHANGE (+/-)		
	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
J.H.S. 22	32	9	2.0	25	10	2.0	-7	+1	0.0
Bronx Writing	26	8	0.0	26	5	0.0	0	-3	0.0
SA – Bronx 2	0	0	0.0	7	2	0.0	+7	+2	0.0

2015-2016 (SECOND YEAR OF PROPOSED IMPLEMENTATION)

If this proposal is approved and if SA – Bronx 2 receives authorization to serve students in grades six through eight, SA – Bronx 2 will serve fifth- and sixth-grade students in building X022 in the 2015-2016 school year.⁸

The table below summarizes the total projected enrollment and projected number of sections to be served at each school in 2015-2016 under this proposal.

2015-2016	Projected Enrollment ⁹	GE/ICT Sections	SC Sections
J.H.S. 22	390-420	15	3
Bronx Writing	435-465	18	4
SA – Bronx 2	168-215	7	0

After J.H.S. 22, Bronx Writing, and SA – Bronx 2 have received their respective baseline or adjusted baseline Footprint allocation of rooms, the following number of rooms will remain unallocated:

2015-2016	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
Space in Excess of Baseline and Adjusted Baseline Allocations	5	5	0.0

The excess space will be allocated among J.H.S. 22, Bronx Writing, and SA – Bronx 2 based upon the following factors: the physical location of the available space in relation to the location of each school within the building and the needs of each school. The DOE believes that this allocation of space is equitable and comparable given the physical location of the available space in relation to the location of each school within the building, and because each school is receiving space appropriate for its needs.

⁸ Pursuant to the terms of its charter, SA – Bronx 2 is currently only authorized to serve students in kindergarten through fifth grade. SA – Bronx 2 has informed the DOE that it intends to apply to SUNY to revise its charter to expand its grade span to include students in sixth through eighth grades. Only SUNY has the authority to approve or deny that request. Should SUNY deny SA – Bronx 2's request to expand, or if SA – Bronx 2 fails to make this request, SA – Bronx 2 will only serve its approved grade span of kindergarten through fifth grade and the BUP will be revised accordingly.

⁹ The DOE's enrollment figures are based on projections. Significant changes in enrollment could result in an amendment to this plan.

The table below summarizes the full 2015-2016 room allocation plan for J.H.S. 22, Bronx Writing, and SA – Bronx 2 based on their baseline Footprint allocations, plus the excess space allocations.

- The DOE has adjusted the baseline allocation of J.H.S. 22 to include two additional full-size rooms in lieu of two half-size rooms to ensure that J.H.S. 22 is able to operate in a contiguous space.
- The DOE has adjusted the baseline allocation of Bronx Writing to include three additional full-size rooms in lieu of three half-size rooms to ensure that Bronx Writing is able to operate in a contiguous space.

2015-2016		Non-Admin Spaces		Administrative Spaces			Total Admin (FSE)	Additional (Excess) Allocation			Grand Total Space Allocation		
		Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms		Additional Full-Size Rooms	Additional Half-Size Rooms	Additional Designed Admin (FSE)	Total Full-Size Rooms	Total Half-Size Rooms	Total Designed Admin (FSE)
J.H.S. 22	Baseline Footprint Allocation	16	6	2.0	1	0	3.0	--	--	--	17	6	2.0
	Adjusted Baseline Allocation	18	4	2.0	1	0	3.0	4	4	0.0	23	8	2.0
Bronx Writing	Baseline Footprint Allocation	19	7	0.0	3	1	3.5	--	--	--	22	8	0.0
	Adjusted Baseline Allocation	22	4	0.0	3	1	3.5	1	0	0.0	26	5	0.0
SA – Bronx 2	Baseline Footprint Allocation	8	1	0.0	1	2	2.0	0	1	0.0	9	4	0.0

In total:

- J.H.S. 22 will be allocated 23 full-size rooms, 8 half-size rooms, and the equivalent of 2.0 full-size designed administrative spaces. This allocation includes 4 full-size rooms and 4 half-size rooms in excess of J.H.S. 22's adjusted Footprint. These excess spaces have been allocated to J.H.S. 22 in order to help ensure that all three school organizations in the building can continue to operate in contiguous spaces.
- Bronx Writing will be allocated 26 full-size rooms and 5 half-size rooms. This allocation includes 1 full-size room in excess of Bronx Writing's adjusted baseline Footprint. These excess spaces have been allocated to Bronx Writing in order to help ensure that all three school organizations in the building can continue to operate in contiguous spaces.
- SA – Bronx 2 will be allocated 9 full-size rooms and 4 half-size rooms. This allocation includes 1 half-size room in excess of SA – Bronx 2's baseline Footprint. This excess space has been allocated to SA – Bronx 2 in order to help ensure that all three school organizations in the building can continue to operate in contiguous spaces.

The proposed room change between 2014-2015 and 2015-2016 is reflected below.

ROOM CHANGE (+/-)	PROPOSED 2014-2015 GRAND TOTAL SPACE ALLOCATIONS			PROPOSED 2015-2016 GRAND TOTAL SPACE ALLOCATIONS			YEAR-OVER-YEAR CHANGE (+/-)		
	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
J.H.S. 22	25	10	2.0	23	8	2.0	-2	-2	0.0
Bronx Writing	26	5	0.0	26	5	0.0	0	0	0.0
SA - Bronx 1	7	2	0.0	9	4	0.0	+2	+2	0.0

2016-2017 (THIRD YEAR OF PROPOSED IMPLEMENTATION)

If this proposal is approved and if SA – Bronx 2 receives authorization to serve students in grades six through eight, SA – Bronx 2 will serve fifth-, sixth-, and seventh-grade students in building X022 in the 2016-2017 school year.

The table below summarizes the total projected enrollment and projected number of sections to be served at each school in 2016-2017 under this proposal.

2016-2017	Projected Enrollment¹⁰	GE/ICT Sections	SC Sections
J.H.S. 22	390-420	15	3
Bronx Writing	435-465	18	4
SA – Bronx 2	248-317	10	0

After J.H.S. 22, Bronx Writing, and SA – Bronx 2 have received their respective baseline or adjusted baseline Footprint allocation of rooms, the following number of rooms will remain unallocated:

2016-2017	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
Space in Excess of Baseline Allocation	4	2	0.0

The excess space will be allocated among J.H.S. 22, Bronx Writing, and SA – Bronx 2 based upon the following factors: the physical location of the available space in relation to the location of each school within the building and the needs of each school. The DOE believes that the allocation of space is equitable and comparable given the physical location of the available space in relation to the location of each school within the building, and because each school is receiving space appropriate for its needs.

The table below summarizes the full 2016-2017 room allocation plan for J.H.S. 22, Bronx Writing, and SA – Bronx 2 based on their baseline Footprint and adjusted baseline Footprint allocations, plus the excess space allocations.

- The DOE has adjusted the baseline allocation of Bronx Writing to include three additional full-size rooms in lieu of three half-size rooms to ensure that all three school organizations in the building are able to continue to operate in a contiguous space.

¹⁰ The DOE's enrollment figures are based on projections. Significant changes in enrollment could result in an amendment to this plan.

2016-2017		Non-Admin Spaces		Administrative Spaces			Total Admin (FSE)	Additional (Excess) Allocation			Grand Total Space Allocation		
		Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms		Additional Full-Size Rooms	Additional Half-Size Rooms	Additional Designed Admin (FSE)	Total Full-Size Rooms	Total Half-Size Rooms	Total Designed Admin (FSE)
J.H.S. 22	Baseline Footprint Allocation	16	6	2.0	1	0	3.0	3	0	0	20	6	2.0
Bronx Writing	Baseline Footprint Allocation	19	7	0.0	3	1	3.5	--	--	--	22	8	0.0
	Adjusted Baseline Allocation	22	4	0.0	3	1	3.5	1	0	0	26	5	0.0
SA – Bronx 2	Baseline Footprint Allocation	11	1	0.0	1	3	2.5	0	2	0	12	6	0.0

In total:

- J.H.S. 22 will be allocated 20 full-size rooms, 6 half-size rooms, and the equivalent of 2.0 full-size designed administrative spaces. This allocation includes 3 full-size rooms in excess of J.H.S. 22's baseline Footprint. J.H.S. 22 has been allocated these excess spaces in order to help ensure that all three school organizations in the building are able to continue to operate in contiguous spaces.
- Bronx Writing will be allocated 26 full-size rooms and 5 half-size rooms. This allocation includes 1 full-size room in excess of Bronx Writing's adjusted Footprint allocation. Bronx Writing has been allocated this excess space in order to help ensure that all three school organizations in the building are able to continue to operate in contiguous spaces.
- SA – Bronx 2 will be allocated 12 full-size rooms and 6 half-size rooms. This allocation includes 2 half-size rooms in excess of SA – Bronx 2's baseline Footprint allocation. SA – Bronx 2 has been allocated these excess spaces in order to help ensure that all three school organizations in the building are able to continue to operate in contiguous spaces.

The proposed room change between the 2015-2016 school year and the 2016-2017 school year is reflected below.

ROOM CHANGE (+/-)	PROPOSED 2015-2016 GRAND TOTAL SPACE ALLOCATIONS			PROPOSED 2016-2017 GRAND TOTAL SPACE ALLOCATIONS			YEAR-OVER-YEAR CHANGE (+/-)		
	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
J.H.S. 22	23	8	2.0	20	6	2.0	-3	-2	0.0
Bronx Writing	26	5	0.0	26	5	0.0	0	0	0.0
SA – Bronx 2	9	4	0.0	12	6	0.0	+3	+2	0.0

2017-2018 (FOURTH AND FINAL YEAR OF IMPLEMENTATION)

If this proposal is approved and if SA – Bronx 2 receives authorization to serve students in grades six through eight, SA – Bronx 2 will serve fifth- through eighth-grade students in building X022 in the 2017-2018 school year.

The table below summarizes the total projected enrollment and projected number of sections to be served at each school in 2017-2018 under this proposal.

2017-2018	Projected Enrollment¹¹	GE/ICT Sections	SC Sections
J.H.S. 22	390-420	15	3
Bronx Writing	435-465	18	4
SA – Bronx 2	328-419	13	0

After J.H.S. 22, Bronx Writing, and SA – Bronx 2 have received their respective baseline or adjusted baseline Footprint allocation of rooms, the following number of rooms will remain unallocated:

2017-2018	Full Size Rooms	Half Size Rooms	Designed Admin (FSE)
Space in Excess of Baseline and Adjusted Baseline Allocations	1	1	0.0

The table below summarizes the full 2017-2018 room allocation plan for J.H.S. 22, Bronx Writing, and SA – Bronx 2 based on their baseline Footprint and adjusted baseline Footprint allocations, plus the excess space allocations.

- The DOE has adjusted the baseline allocation of Bronx Writing to include three additional full-size rooms in lieu of three half-size rooms to ensure that all three school organizations in the building are able to continue to operate in contiguous spaces.

¹¹ The DOE's enrollment figures are based on projections. Significant changes in enrollment could result in an amendment to this plan.

2017-2018		Non-Admin Spaces		Administrative Spaces			Total Admin (FSE)	Additional (Excess) Allocation			Grand Total Space Allocation		
		Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms		Additional Full-Size Rooms	Additional Half-Size Rooms	Additional Designed Admin (FSE)	Total Full-Size Rooms	Total Half-Size Rooms	Total Designed Admin (FSE)
J.H.S. 22	Baseline Footprint Allocation	16	6	2.0	1	0	3.0	0	0	0.0	17	6	2.0
Bronx Writing	Baseline Footprint Allocation	19	7	0.0	3	1	3.5	--	--	--	22	8	0.0
	Adjusted Baseline Allocation	22	4	0.0	3	1	3.0	1	0	0.0	26	5	0.0
SA - Bronx 2	Baseline Footprint Allocation	14	1	0.0	1	4	3.0	0	1	0.0	15	6	0.0

In total:

- J.H.S. 22 will be allocated 17 full-size rooms, 6 half-size rooms, and the equivalent of 2.0 full-size designed administrative spaces. This allocation matches J.H.S. 22’s baseline Footprint allocation. J.H.S. 22 has not been allocated any excess space so that all three school organizations in the building can continue to operate in contiguous spaces.
- Bronx Writing will be allocated 26 full-size rooms and 5 half-size rooms. This allocation includes 1 full-size room in excess of Bronx Writing’s adjusted Footprint allocation. Bronx Writing has been allocated this excess space in order to help ensure that all three school organizations in the building are able to continue to operate in contiguous spaces.
- SA – Bronx 2 will be allocated 15 full-size rooms and 6 half-size rooms. This allocation includes 1 half-size room in excess of SA – Bronx 2’s baseline Footprint allocation. SA – Bronx 2 has been allocated this excess space in order to help ensure that all three school organizations in the building are able to continue to operate in contiguous spaces.

The proposed room change between the 2016-2017 school year and the 2017-2018 school year is reflected below.

ROOM CHANGE (+/-)	PROPOSED 2016-2017 GRAND TOTAL SPACE ALLOCATIONS			PROPOSED 2017-2018 GRAND TOTAL SPACE ALLOCATIONS			YEAR-OVER-YEAR CHANGE (+/-)		
	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)	Full-Size Rooms	Half-Size Rooms	Designed Admin (FSE)
J.H.S. 22	20	6	2.0	17	6	2.0	-3	0	0.0
Bronx Writing	26	5	0.0	26	5	0.0	0	0	0.0
SA – Bronx 2	12	6	0.0	15	6	0.0	+3	0	0.0

Shared Space Plan

A proposed Shared Space Plan is below. The following plan is based on the estimated duration of time each of the co-located schools will have in each of the shared spaces in the X022 building during the first year of implementation of this proposal in 2014-2015, when SA – Bronx 2 will begin to serve fifth grade. The final shared space schedule will be collaboratively drafted by the Building Council if the proposed co-location has been approved by the Panel for Education Policy.

JUSTIFICATION OF FEASIBILITY AND EQUITY OF PROPOSED SHARED SPACE PLAN

This proposed Shared Space Plan is based upon the population size and other relevant factors further described below for each co-located school. Although the DOE has proposed how the shared spaces in the X022 building may be utilized, the Building Council is free to deviate from the proposed Shared Space Plan to accommodate specific programmatic needs of all special populations or groups within each school as is equitable and comparable, provided that the Building Council comes to an agreement of the final Shared Space Plan collaboratively. (NOTE: The Building Council will revisit the Shared Space Plan and its schedules on an annual basis to account for any changes in enrollment or programmatic needs. 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>.)

The below proposed schedule is based on projected enrollments for each co-located school, current space allocation plans, current lunch schedules for the existing schools in the building as described on the DOE School Food website, the total capacity of each shared space, the grades served by each of the co-located schools, and the start and end times of the school day based on the Office of Pupil Transportation's bus schedule for a regular school day.¹² Where possible, the proposed schedule maintains schools' current allocation of time for each shared space and re-distributes remaining time as needed. To the extent feasible, shared spaces are allocated in a manner that allows schools that have already been using the space this year to continue using it on a similar schedule next year, based on the 2011 Campus Audit Template submitted by the Building Council.¹³ As noted, decisions regarding the use and allocation of shared spaces will be made collaboratively by all organizations through the Building Council.

In planning how J.H.S. 22, Bronx Writing, and SA – Bronx 2 may use shared space, the DOE has applied the factors described above as follows to develop a proposed plan that allocates time in each space equitably:

Cafeteria

- There is one main cafeteria in the X022 building, which has the capacity to serve 670 students.
- The total time allocated to each organization in the cafeteria is primarily based upon each organization's current use of the cafeteria, projected enrollment, capacity of the cafeteria, and grade levels served. Each organization will be able to accommodate all of its students in the cafeteria within this proposed allocation of time:
 - SA – Bronx 2 has been allocated a 30-minute period daily in the main cafeteria from 11:00 a.m. to 11:30 a.m.
 - J.H.S. 22 has been allocated a 75-minute period daily in the main cafeteria from 11:30 a.m. to 12:45 p.m.
 - Bronx Writing has been allocated one 75-minute period daily in the main cafeteria from 12:45 p.m. to 2:00 p.m.

¹² See DOE's Office of Pupil Transportation website at: <https://www.opt-osfns.org/opt/Resources/SchoolRouteStSearch/SearchResult.aspx>.

¹³ Campus Audits are submitted by each Building Council on an annual basis to the Senior Supervising Superintendent's Office. The Campus Audit documents the collective planning and implementation of Building Council decisions such as shared space scheduling.

- With regard to breakfast, the DOE notes that traditionally not all students have opted to participate in the breakfast program at X022. Accordingly, and in light of the large capacity of the cafeteria, J.H.S. 22 and Bronx Writing can be served during a single, overlapping breakfast period in the cafeteria. Based on the early start of SA – Bronx 2's school day, SA – Bronx 2 is allocated an earlier 25-minute period in the cafeteria for breakfast. This schedule is based on the manner in which cafeteria time is currently allocated in the X022 building.
- The Building Council is free to deviate from the proposed Shared Space Plan of the cafeteria to accommodate specific programmatic needs of all groups within each school as is equitable and comparable, provided that the Building Council comes to an agreement on the final Shared Space Plan collaboratively.

Outdoor Playground

- The DOE notes that the outdoor play yard is a shared space; the DOE proposes in the schedule below that time in the outdoor playground should be allocated to all schools based on the relative projected enrollment for each school and on the needs of each school.
- In the schedule below, the playground time is loosely aligned to the cafeteria schedule to provide schools with the option of offering students a recess before, during or after the proposed lunch period. The schedule includes several overlapping times, acknowledging that schools would select an appropriate time out of these options and additionally can choose to deviate from this plan. The schools would not be required to overlap depending on which times within these allotments they choose to provide recess.
- In the proposed plan:
 - SA – Bronx 2 is allocated one 30-minute period in the outdoor playground from 11:30 a.m. to 12:00 p.m.
 - J.H.S. 22 is allocated one 85-minute period in the outdoor playground from 12:00 p.m. to 1:25 p.m.
 - Bronx Writing is allocated one 80-minute period in the outdoor playground from 1:25 p.m. to 2:45 p.m.
- Because the proposed allocations maintains existing schools' current allocation of time, and because the proposed allocations provide all three schools with overlapping cafeteria and playground time periods, the DOE believes that the proposed allocation is equitable and comparable.
- Additional times remain unallocated. The Building Council is empowered to make additional and alternative allocations.

Gymnasium, Library, and Auditorium

Time in the library, gymnasium, and auditorium will be based upon the enrollments of the schools, as well as the schools' special needs.

The Building Council is free to deviate from the proposed Shared Space Plan and may revert to the current practice of allocating access to the gym on an as-needed basis to accommodate specific programmatic needs of all groups within each school as is equitable and comparable, provided that the Building Council comes to an agreement on the final Shared Space Plan collaboratively.

Gymnasium

- There are two gymnasiums in the building.
- Currently, J.H.S. 22 is allocated space in one gym for the entire day and Bronx Writing is allocated space the other gym for the entire day. The proposed schedule below seeks to maintain this arrangement to the greatest extent possible by allocating hour-long blocks of time in each gym to SA – Bronx 2, which leaves J.H.S. 22 and Bronx Writing with sizeable blocks of time during which they can each continue to make exclusive use of one of the gymnasiums.
- In the proposed schedule below, J.H.S. 22 is allocated 30 hours of time in a gymnasium each week. J.H.S. 22 has received the largest allocation of gym time because in 2014-2015, during the first year of implementation, J.H.S. 22 is projected to have the greatest enrollment of the three schools in the X022 building. Bronx Writing is allocated 25 hours of time in a gymnasium each week. SA – Bronx 2 is allocated 10 hours of time in the two gymnasiums each week. SA – Bronx 2 will have the smallest enrollment of the three schools and therefore has been allocated the least amount of gym time.
- Because the proposed allocations have been devised with regard to the schools' relative enrollments and the existing allocation of shared space, the DOE believes that the proposed allocation is equitable and comparable.

Library

- The DOE proposes that the library be allocated to all schools based on the relative projected enrollment for each school. In the proposed plan, J.H.S. 22 is allocated the largest amount of time in the library based on its projected enrollment (13 hours weekly). Bronx Writing has a comparable enrollment and, as a result, will be allocated a comparable amount of time in the library (12 hours weekly). SA – Bronx 2, which is projected to have the smallest enrollment of the three schools in 2014-2015, is allocated 5 hours weekly.

Auditorium

- There is one auditorium in the X022 building, which has the capacity to serve 516 students.
 - SA – Bronx 2 has been allocated one 60-minute period daily in the auditorium from 8:00 a.m. to 9:00 a.m.¹⁴
 - J.H.S. 22 has been allocated one 190-minute period daily in the auditorium from 9:00 a.m. to 12:10 p.m.
 - Bronx Writing has been allocated one 170-minute period daily in the auditorium from 12:10 p.m. to 3:00 p.m.

¹⁴ SA – Bronx 2 has been allocated auditorium time slightly in excess of the school's proportional enrollment because SA – Bronx 2 has a longer school day and can therefore make use of the auditorium from 8:00 a.m. to 9:00 a.m. without limiting the amount of auditorium time allocated to J.H.S. 22 and Bronx Writing.

After-School Programs

- The DOE notes that currently the shared spaces are not allocated for after-school hours. In the schedule below, all shared spaces are only allocated until 3:00 p.m. The Building Council will allocate space as needed for after-school programs.

As noted in this BUP, the Building Council will address any requests to use all shared spaces after school hours and will resolve all conflicts. The Building Council is free to deviate from the proposed Shared Space Plan to accommodate specific programmatic needs of all groups within each school as is equitable and comparable, provided that the Building Council comes to an agreement on the final Shared Space Plan collaboratively. This agreement could result in the current schools in the building changing their use of the shared space if SA – Bronx 2 further expands in the building after the 2014-2015 school year.

In 2014-2015, the DOE projects J.H.S. 22 will serve 475-505 students, Bronx Writing will serve 435-465 students, and SA – Bronx 2 will serve 88-113 students.

Based on the schedule below and the explanations provided above the DOE believes that the proposed Shared Space Plan is feasible and that each school is being treated equitably and comparably in its ability to use all of the shared spaces in the building.

Space	Monday	Tuesday	Wednesday	Thursday	Friday
Cafeteria (Capacity: 670)	<u>Breakfast:</u> SA – Bronx 2 7:15a.m.-7:40a.m. J.H.S. 22 7:45a.m.-8:30a.m. Bronx Writing 7:45a.m.-8:30a.m. <u>Lunch:</u> SA – Bronx 2 11:00a.m.-11:30a.m. J.H.S. 22 11:30a.m.-12:45p.m. Bronx Writing 12:45p.m.-2:00p.m.	<u>Breakfast:</u> SA – Bronx 2 7:15a.m.-7:40a.m. J.H.S. 22 7:45a.m.-8:30a.m. Bronx Writing 7:45a.m.-8:30a.m. <u>Lunch:</u> SA – Bronx 2 11:00a.m.-11:30a.m. J.H.S. 22 11:30a.m.-12:45p.m. Bronx Writing 12:45p.m.-2:00p.m.	<u>Breakfast:</u> SA – Bronx 2 7:15a.m.-7:40a.m. J.H.S. 22 7:45a.m.-8:30a.m. Bronx Writing 7:45a.m.-8:30a.m. <u>Lunch:</u> SA – Bronx 2 11:00a.m.-11:30a.m. J.H.S. 22 11:30a.m.-12:45p.m. Bronx Writing 12:45p.m.-2:00p.m.	<u>Breakfast:</u> SA – Bronx 2 7:15a.m.-7:40a.m. J.H.S. 22 7:45a.m.-8:30a.m. Bronx Writing 7:45a.m.-8:30a.m. <u>Lunch:</u> SA – Bronx 2 11:00a.m.-11:30a.m. J.H.S. 22 11:30a.m.-12:45p.m. Bronx Writing 12:45p.m.-2:00p.m.	<u>Breakfast:</u> SA – Bronx 2 7:15a.m.-7:40a.m. J.H.S. 22 7:45a.m.-8:30a.m. Bronx Writing 7:45a.m.-8:30a.m. <u>Lunch:</u> SA – Bronx 2 11:00a.m.-11:30a.m. J.H.S. 22 11:30a.m.-12:45p.m. Bronx Writing 12:45p.m.-2:00p.m.
Gym 1 (Capacity: 250)	SA – Bronx 2 8:00 a.m.-9:00a.m. J.H.S. 22 9:00a.m.-3:00p.m.				
Gym 2 (Capacity: 250)	Bronx Writing 9:00a.m.-2:00p.m. SA – Bronx 2 2:00p.m.-3:00p.m.				
Outdoor Playground	SA – Bronx 2 11:30 a.m.-12:00p.m. J.H.S. 22 12:00p.m.-1:25p.m. Bronx Writing 1:25p.m.-2:45p.m.				
Library	J.H.S. 22 9:00a.m.-12:00p.m. SA – Bronx 2 12:00p.m.-1:00p.m. Bronx Writing 1:00p.m.-3:00p.m.	Bronx Writing 9:00a.m.-12:00p.m. SA – Bronx 2 12:00p.m.-1:00p.m. J.H.S. 22 1:00p.m.-3:00p.m.	J.H.S. 22 9:00a.m.-12:00p.m. SA – Bronx 2 12:00p.m.-1:00p.m. Bronx Writing 1:00p.m.-3:00p.m.	Bronx Writing 9:00a.m.-12:00p.m. SA – Bronx 2 12:00p.m.-1:00p.m. J.H.S. 22 1:00p.m.-3:00p.m.	J.H.S. 22 9:00a.m.-12:00p.m. SA – Bronx 2 12:00p.m.-1:00p.m. Bronx Writing 1:00p.m.-3:00p.m.
Auditorium (Capacity: 516)	SA – Bronx 2 8:00.m.-9:00a.m. J.H.S. 22 9:00a.m.-12:10p.m. Bronx Writing 12:10p.m.-3:00p.m.				

Building Safety and Security

Pursuant to Chancellor's Regulation A-414, every school/campus must have a School Safety Committee. The committee plays an essential role in the establishment of safety procedures, the communication of expectations and responsibilities of students and staff, and the design of prevention and intervention strategies and programs specific to the needs of the school. The committee is comprised of various members of the school community, including Principal(s); designee of all other programs operating within the building; United Federation of Teachers Chapter Leader; Custodial Engineer/designee; and In-house School Safety Agent Level III. The committee is responsible for addressing safety matters on an ongoing basis and making appropriate recommendations to the Principal(s) when it identifies the need for additional security measures, intervention, training, etc.

The committee is also responsible for developing a comprehensive School Safety Plan which defines the normal operations of the site and what procedures are in place in the event of an emergency. The plan must be consistent with the Citywide prescribed safety plan shell. Each program operating within a school must enter program specific information in the School Safety Plan. The School Safety Plan is updated annually by the School Safety Committee in order to meet changing security needs, changes in organization and building conditions, and other factors. In addition, the committee recommends changes in the School Safety Plan at any other time when it is necessary to address security concerns.

Consistent with the process described above, the respective leaders/designees of J.H.S. 22, Bronx Writing, and SA – Bronx 2 will be part of the X022 School Safety Committee. As a member of the School Safety Committee, each such leader/designee will participate in the development of the School Safety Plan and ensure that any security-related issues or needs that may arise with respect to the expansion of SA – Bronx 2 will be addressed on an ongoing basis. Moreover, the Safety Plan for the X022 school building will be modified as appropriate to meet any changing security needs associated with the expansion. All schools will enter information in the School Safety Plan to ensure the safe operation of the school building.

Each school building must also establish a Building Response Team ("BRT") that will consist of trained staff members from each school in X022, and that is activated when emergencies or large building-wide events occur. The members of this team must be identified and listed in the School Safety Plan.

The completed School Safety Plan for the X022 school building will be submitted to the Borough Safety Directors of the Office of School and Youth Development for approval. If changes or modifications are necessary, the School Safety Committee will be advised. Once the School Safety Plan is approved, it will be submitted to the New York Police Department (NYPD) for final approval and certification by the NYPD.

Proposed Communications Strategy

As per the Campus Policy Memo 2011,¹⁵ co-located schools on campuses must actively participate in a Building Council (“BC”), which is a campus structure for administrative decision-making for issues impacting all schools in the building. Only principals and charter school leaders serve on the BC. The BC shall meet at least once a month to discuss and resolve issues related to the smooth daily operation of all schools in the building and the safety of the students they serve. The BC principals and charter school leaders, where applicable, communicate their decisions campus-wide to staff, students and parents, especially for issues of safety, shared space, campus schedules, split-staff agreements and extended facility use.

A Shared Space Committee (“SSC”) shall be established by the principals of the schools at campuses where charter schools are co-located in a public school building with one or more non-charter schools or District 75 schools, as set forth in Chancellor’s Regulation A-190. With respect to charter school co-locations approved after May 28, 2010, the effective date of the amended Charter Schools Act, the SSC is to review the implementation of the BUP once it has been approved by the PEP. With respect to charter schools that were approved to be located or co-located in a public school building prior to the effective date of the amended Charter Schools Act, the SSC shall review implementation of the current building space plans in place at those buildings. The SSC will meet at minimum four times per year.

The SSC will be comprised of the principal, a teacher and a parent of each co-located school. With respect to a non-charter school’s teacher and parent members, such SSC members shall be selected by the corresponding constituent member of the School Leadership Team of the school. Charter school leaders will work with their constituencies to select the parent and teacher representing that school. SSC agendas and minutes shall be shared with the BC. SSC members may be asked to communicate with their constituencies about the BUP and its campus implementation.

¹⁵ Campus Policy Memo 2011 is available at <http://schools.nyc.gov/community/campusgov>, under “Key Documents.”