

Public Comment Analysis

Date: October 11, 2013

The Proposed Co-location of Success Academy Charter School – New York 2 (84XTBD) with Existing Schools J.H.S. 131 Albert Einstein (08X131) and Soundview for Culture and Scholarship (08X448) in Building X131 Beginning in 2014-2015

Date of Panel Vote: October 15, 2013

Summary of Proposal

On August 30, 2013, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) and a Building Utilization Plan (“BUP”) describing a proposal to co-locate grades kindergarten through five of a new public charter school, Success Academy Charter School – New York 2 (84XTBD, “SA – New York 2”) in building X131 (“X131”), located at 885 Bolton Avenue, Bronx, NY 10473 in Community School District 8 (“District 8”) beginning in the 2014-2015 school year. If this proposal is approved, SA – New York 2 would be co-located with J.H.S. 131 Albert Einstein (08X131, “J.H.S. 131”), and with Soundview Academy for Culture and Scholarship (08X448, “Soundview Academy”), both district middle schools serving 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 – New York 2 will be operated by Success Academy Charter Schools (“SACS”), a charter management organization (“CMO”) that currently operates 18 public charter schools in New York City, including six new public elementary schools serving students for the first time in 2013-2014. The four SACS schools that received a Progress Report for the 2011-2012 school year all received an overall grade of A.

SA – New York 2 has submitted a preliminary application for charter authorization from the State University of New York Trustees (“SUNY”) to serve students in kindergarten through fifth grades. The proposal to open and co-locate SA – New York 2 in X131 described in this EIS is contingent upon SUNY’s approval of SA – New York 2’s application for charter authorization. Only SUNY has the authority to approve or deny SA – New York 2’s application for charter authorization. For the purpose of this proposal, it is assumed that SUNY will approve SA – New York 2’s application.

If this proposal is approved, SA – New York 2 will open in the 2014-2015 school year and will serve approximately 120-180 students in kindergarten and first grade, and will add one grade each year until it reaches full scale in 2018-2019. At that time, SA – New York 2 will serve approximately 450-540 students in kindergarten through fifth grades. The school will admit students via the charter lottery application process, with preference given to District 8 residents, as described below in more detail.

Concurrently, the DOE is planning to reduce the enrollment at J.H.S. 131 over a period of three years beginning in September 2014. Beginning in September 2014, J.H.S. 131 will admit a smaller incoming sixth-grade class of approximately 175-185 students, as opposed to the approximately 245-255 students it has served in sixth grade in recent years. The school will continue to admit approximately 175-185 sixth-grade students in future years until all grades, six through eight, serve fewer sections in 2016-2017. J.H.S. 131 currently admits students to two programs: a zoned program that is opened to zoned students; and an unscreened program that is open to all District 8 students. These admissions methods will be unchanged as a result of this proposal but the unscreened program will admit fewer students in the coming years.

Additionally, X131 houses a community-based organization (“CBO”), ASPIRA.

X131 has the capacity to serve 1,401 students, but in the 2013-2014 school year, J.H.S. 131 and Soundview Academy are only serving approximately 1,046 students. This yields a building utilization rate of approximately 75%, which demonstrates that the building is “underutilized” and has space to accommodate additional students. As such, X131 has been identified as an underutilized building. If this proposal is approved, when SA – New York 2 reaches full scale and after the enrollment reduction of J.H.S. 131 is complete, in 2018-2019, SA – New York 2, J.H.S. 131, and Soundview Academy will collectively serve approximately 1,260-1,410 students in the building, which yields a projected utilization rate of 90%-101%. As discussed in Section II.B of the EIS and in the attached Building Utilization Plan (“BUP”), while the projected range for the building utilization rate signifies the possibility of a building utilization rate slightly in excess of 100%, all schools will receive at least their baseline (or adjusted baseline) footprint allocation of space.

The details of this proposal have been released in an EIS and amended BUP which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2013-2014/Oct15SchoolProposals>

Copies of the EIS and BUP are also available in the main offices of J.H.S. 131 and Soundview Academy.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at the X131 building on October 2, 2013. At that 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 District 8 Community Superintendent Timothy Behr, District Family Advocate for District 8 Jean DePesa, Assemblyman Marcos Crespo’s Representative Vivian Justo; J.H.S. 131 Principal Monique Mason; J.H.S. 131 School Leadership Team (“SLT”) Representatives Stephen Donnelly, Jason Koo, Marjorie Bishop, and Marian McCauley; Soundview Academy Principal William Frackelton, Soundview Academy SLT Representatives Marissa Bailey, William Gomez, Hope Brown, and Patricia Lowery; Community Education Council (“CEC”) 8 Representatives Bryan D’Ottavi, Lisa Mateo, Janet Lee Bosch, Eduardo Hernandez, Chancy Marsh IV, Tanisha Robinson, Laurine Berry; Jennifer Kelly from the DOE’s Office of Student Enrollment Planning and Operations, and Ashley Davies and Yael Kalban from the DOE’s Division of Portfolio Planning.

The following questions, comments, and remarks were made at the joint public hearing on October 2, 2013:

1. Bryan D’Ottavi, CEC 8 President, commented that:¹
 - a. The entire CEC 8 is against this proposal.
 - b. There is not a large turnout at the hearing because people do not feel threatened by this proposal. If the proposal was for co-locating a middle school with an existing elementary school, then there would be a higher turnout. He wished there were more people in attendance to let the DOE know that the community is against the proposal.
 - c. There is no need for this proposal because construction of a new school building was just approved for the district.
 - d. This proposal will put the younger students at risk because they have to interact with older students currently in the building, some of who are even 15, 16, and 17 years old.
 - e. Who will families be able to call when there are safety issues at the schools?
 - f. The DOE is trying to overwhelm the community by proposing multiple school changes at once.

¹ The DOE also received a written submission from Mr. D’Ottavi capturing some of these same points: specifically, the CEC’s general opposition to the DOE’s proposals in District 8, their belief that elementary students should not be co-located with middle school students, and their concern that the PEP vote is being held in Brooklyn.

- g. He did not understand why the Panel for Educational Policy (“PEP”) vote was being held in Brooklyn and not in the Bronx.
 - h. Parents hold the power, and he has contacted elected officials and will continue to fight. Additionally, the CEC plans to bus people to the PEP meeting on October 15th.
 - i. The DOE does not does not have the interests of the community and children in mind, and come January, many of DOE officials will be gone.
 2. Eduardo Hernandez, a member of CEC 8, stated the following:
 - a. He has been a parent in the district for many years, but only became more involved in the CEC after last year’s rezoning, which he did not support.
 - b. The DOE is supposed to take care of students, but its actions do not demonstrate that.
 - c. Closing schools should be a science. The DOE should try to figure out why schools are failing rather than just closing a school which is the easy way out.
 - d. The DOE takes resources from schools and gives them to charter schools and private organizations.
 - e. He does not have an issue with charter schools because they help rid the system of bureaucracy.
 - f. There is no place for students to go when the DOE lets district schools fail.
 - g. Parents are tired of having to fight the DOE because the DOE is not doing its job.
 - h. The lack of parental involvement at the hearing should not be a reason to pass this proposal.
 - i. Parents should continue to fight, and go to the PEP meeting on October 15th to express their views.
 - j. The DOE should take the \$19,000 it spends per student and give it to students for college.
 3. Chancy Marsh, a member of CEC 8, commented that:
 - a. This is the Jim Crow of education, where education is claimed to be separate but equal.
 - b. Schools in other parts of the city are receiving more resources than schools in the Bronx.
 - c. He opposes putting an elementary school in a building with middle school students.
 - d. There needs to be greater attendance at these meetings.
 - e. A lot of student behavior issues begin in middle school, including students missing class and doing drugs.
 - f. No questions will be answered at the meeting.
 4. Tanisha Robinson, a member of CEC 8, commented that:
 - a. Parents should not support this proposal.
 - b. The DOE’s Portfolio Office should support J.H.S. 131 and Soundview Academy.
 - c. J.H.S. 131 and Soundview Academy are already limited in space, thus the DOE should not be taking away space from these schools.
 - d. The guidance counselors at Soundview share a room with seven other counselors, but they should have their own room so that students can have privacy when meeting with a counselor.
 - e. The principal is sharing her office with three other people already.
 5. A member of the J.H.S. 131 SLT shared the following concerns:
 - a. This proposal is the last attempt at change from a mayor who has been bad for the Bronx and for education.
 - b. Teachers at the school have not been given the resources to do their jobs.
 - c. This proposal will result in the DOE taking money away from J.H.S. 131.
 - d. Where is there space for the new school?
 - e. Why would you put an elementary school with middle schools?
 - f. There is no logic in the way that the DOE operates in closing schools.
 - g. The DOE should reduce class sizes.
 6. Two members of the J.H.S. 131 SLT and a J.H.S. 131 parent commented that the new principal is doing a great job and should be given a chance.
 7. One member of the J.H.S. 131 SLT made the following comments:
 - a. The EIS explains the reduction at J.H.S. 131 but does not call for a plan of smaller classes.
 - b. He noted that he teaches one of the smaller seventh grade classes, which has 30 students in the class.
 - c. Everyone must spread the word about the PEP meeting on October 15th.
 - d. Parents must make their voices be heard.

8. One J.H.S. 131 SLT member commented in opposition to the charter school co-location stating that it will result in children having to travel far away from home to go to school.
9. One member of the Soundview Academy SLT commented that the proposal will result in a loss of space and resources at the school for the students who need it most.
10. Several J.H.S. 131 SLT members, Soundview View Academy SLT members, and members of the public commented on the lack of attendance at the meeting.
11. One member of the Soundview Academy SLT commented that the community needs to make their opinions known to the community's elected officials.
12. One member of the Soundview Academy SLT and X131 Building Response Team stated general opposition to the proposal and the following safety concerns:
 - a. Despite how far the building safety response team has come, there are still issues with nearby high school students coming to the building and causing fights.
 - b. The middle school students are not going to understand what it means to share space and be respectful with elementary school students.
 - c. The speaker asked what kind of safety policies the charter school will have.
 - d. Training a whole new school about security procedures will set the Building Response Team back.
13. Marissa Bailey, a member of the Soundview Academy SLT, stated the following:
 - a. There has been an increase in student applicants over the past year. For the 2012-2013 school year Soundview had 198 applicants, and for the 2013-2014 school year, Soundview had 411 applicants.
 - b. Based on the increase in applicants over the past year, Soundview will serve 330-340 students in the future, which is above the 280 students stated in the BUP.
 - c. The BUP indicates that the school will lose three full-size rooms over the next five years, and the school already has teachers who do not have their own classrooms.
 - d. Soundview has been recognized by Central for its work on post-secondary readiness and its work with ELL students.
 - e. Soundview just started construction on a new multimillion dollar multimedia library that parents and administrators fought for, and the proposal only allows the school four hours in the library.
 - f. Soundview performed above the citywide average of middle schools on the NYC school survey for 2012-2013 in all areas including academic expectations, communication, engagement, and safety and respect
 - g. Schools that are doing well deserve support and opportunities to strengthen their programming.
14. Several commenters questioned where the charter school would go given the lack of space.
15. Several current and former Soundview Academy students spoke positively about Soundview Academy and specifically about the art program at Soundview Academy and their concern that this proposal would prohibit future students from having access to these same programs.
16. Several commenters expressed concern with adding an elementary school to a building with middle school students.
17. Several commenters expressed support for Soundview's Academy principal, staff, and school programming.
18. One commenter expressed concern that all children will not have access to the library when they need it.

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

19. One written comment asked where students who would have gone to J.H.S. 131 will go as a result of the enrollment reduction.

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

Comments 1(f), 2(a, c, j), 3(e, f), 5(f, g), and 12(a) are not directly related to the proposal and thus do not require a response.

Comment 2(e) is in support of the proposal and thus does not require a response.

Comments 1(a, i), 2(b), 4(a), and 5(a) voice general opposition to the proposal.

While some members of the J.H.S. 131 and Soundview Academy community object to the possibility of co-locating a new charter elementary school and reducing the enrollment at J.H.S. 131 in the X131 building, the DOE is committed to providing a portfolio of high quality school options to students and families. The DOE strives to ensure that all students in New York City have access to a high-quality school at every stage of their education.

J.H.S. 131 has struggled to provide quality outcomes for its students. Thus, the DOE believes that the reduction in J.H.S. 131's enrollment over the course of three years will provide J.H.S. 131 with the opportunity to concentrate on a smaller cohort of students, and allow for a new school option to develop in the building for Bronx students and families.

Comments 1(b, h), 2(g, h, i), 3(d), 7(c, d), 10, and 11 relate to the lack of parental and community involvement at the joint public hearing and, more generally encourage more parents and community members to become involved.

The DOE supports parent involvement in all aspects of their students' education. When families are involved in education, schools and students benefit. The DOE acknowledges the efforts being made by J.H.S. 131 and Soundview Academy families and encourages continued parental participation in the school community and at the PEP meeting on October 15th.

Comments 1(e) and 12(c) concern safety in the X131 building as a result of the co-location and asked about what safety policies the charter school will have.

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 changing security needs, changes in organization and building conditions, and any other factors. Updates can also be made at any other time if it is necessary to address security concerns. 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. SA-New York 2 will participate in the School Safety Committee and help establish security procedures for the building.

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

Comments 1(d), 3(c, e), 5(e), 12(b), and 16 express concern with having elementary and middle school students in the same building.

Due to space limitations, it is not unusual for varying grade levels to be co-located in a building together. There are numerous examples of buildings and campuses in New York City and in the Bronx specifically that successfully house mixed grade co-locations.

These examples include:

- Building 166 in District 9 which currently houses three schools: Grant Avenue Elementary School (09X449) which serves students in grades K-5; Science and Technology Academy: A Mott Hall School (09X454) which serves students in grades 6-8; and Bronx Early College Academy for Teaching & Learning (09X324) which serves students in grades 6-12.
- Building X193 in District 12 which currently houses three schools: P.S. 211 (12X211) which serves students in grades K-8, I.S. 318 Math, Science and Technology Through the Arts (12X318) which serves

students in grades 6-8, and Children's Aid College Prep Charter School (84X124) which currently serves students in grades K-2.

- Building X026 in District 10 which currently houses two schools and a D75 program: MS. 390 (10X390) which currently serves students in grades 6-8, P.S. 396 (10X396) which serves students in grades K-5, and P.S. X010, a D75 program which serves students in grades K-5.

The DOE is optimistic that this success and cooperation can be replicated in the X131 building and that the School Safety Committee will address any specific issues if they arise.

Comment 1(c) questions the necessity of this proposal given that a new elementary school was approved for District 8.

The DOE recognizes the need for additional elementary school seats in the Soundview area of District 8. The School Construction Authority is in the design and public review process phase for a school site at 1024-1036 White Plains Road for a new 379-seat elementary school for the students and families of District 8. That said, there are still several phases and years before the new school will be open to serve students. Given the immediate need for elementary school seats, the DOE believes that this proposal will help serve that immediate need.

Comment 1(g) voices concern that the PEP vote on the proposal is in Brooklyn and not the Bronx.

The PEP votes on several proposals impacting schools across the city and the monthly meeting locations vary from month to month. Throughout the school year, PEP meetings rotate amongst locations throughout all five boroughs. For example, the August meeting was held in Manhattan, the September meeting was held in Queens, the October meetings are being held in Brooklyn. Additionally both the December 2013 and June 2014 meetings will be held in the Bronx. Locations are chosen based on the schools ability to accommodate large public meetings and convenience to public transportation as well as accessibility. Travel directions to the meetings can be found here: <http://schools.nyc.gov/AboutUs/leadership/PEP/meetings/Directions/default.htm>.

Comments 2(f) and 19 voice concern with where students who would have gone to J.H.S. 131 will go as a result of the reduction in enrollment.

The DOE makes every effort to ensure that families have a range of high quality options from which to choose. This proposal to open a new elementary school, SA – New York 2, marks one such effort. When the DOE has to make the tough decision to close a failing school, or in this case, to reduce enrollment at a struggling school (J.H.S. 131), the DOE ensures that there is enough capacity to at other nearby schools to accommodate the students who would have attended those schools.

Even with the enrollment reduction at J.H.S. 131, there will be excess middle school capacity in District 8. Based on the 2013-2014 Budget Register Projections, J.H.S. 131 is currently serving approximately 250 sixth-grade students. In 2013-2014, there are approximately 2,251 sixth-grade students enrolled in District 8 middle schools and charter middle schools located in District 8. Including the seats currently available at J.H.S. 131, there are approximately 3,078 total sixth-grade seats in District 8 middle schools and charter schools located in District 8, meaning there is an excess of approximately 827 sixth-grade seats in the district.

Excluding the seats currently available at J.H.S. 131 that would no longer be available after the enrollment reduction, there are approximately 3,007 total sixth-grade seats in District 8 middle schools and charter schools located in District 8. Therefore, even after excluding the seats that would have been offered at J.H.S. 131, there are still approximately 756 excess sixth-grade seats in District 8 middle schools.

Additionally, the DOE has proposed to co-locate a new charter middle school, Girls Preparatory Charter School of the Bronx (84X487, "Girls Prep Bronx"), in District 8. The anticipated proposal is projected to add approximately 75 sixth-grade seats in District 8. Thus, if that proposal is approved, there will be a total of approximately 3,082

sixth-grade seats in District 8, yielding an even greater number of excess of seats projected in District 8 middle schools: approximately 831 sixth-grade seats.

Comments 2(d), 3(a), and 5(c) concern the resources provided to charter schools, and purported discrepancies in funding and support between charter schools and district schools.

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"). Charter management organizations, just like any other school citywide, may also choose to raise additional funds to purchase various resources they feel would benefit their students.

The DOE notes that in accordance with New York State Charter Schools Act of 1998 (as amended), any proposed capital improvements or facility upgrades in excess of five thousand dollars, regardless of the source of funding, that is made to accommodate the co-location of a charter school within a public school building, must first be approved by the Chancellor. The Act states: "For any such improvements or upgrades that have been approved by the Chancellor, capital improvements or facility upgrades shall be made in an amount equal to the expenditure of the charter school for each noncharter public school within the public school building. For any capital improvements or facility upgrades in excess of five thousand dollars that have been approved by the Chancellor, regardless of the source of funding, made in a charter school that is already co-located within a public school building, matching capital improvements or facility upgrades shall be made in an amount equal to the expenditure of the charter school for each non-charter public school within the public school building within three months of such improvements or upgrades."

Comments 3(b) and 4(b) express that the DOE should support the schools in the X131 building and suggest that Bronx schools have not been adequately supported as compared to other schools in the city.

The DOE supports and will continue to support all schools in the X131 building during and after the implementation of this proposal if the proposal is approved.

All schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools; and they also receive individualized supports to address their particular challenges. The DOE does everything it can to provide schools with leadership, operational, instructional, and student supports that it needs to succeed.

Comments 4(c.), 5(d), 9, and 14 express concern as to how another school can be placed in the building and the impact it will have on the space available to the two schools currently in the building.

The DOE is working with the J.H.S. 131 community to gradually decrease the school's enrollment by approximately 211-241 students over a period of three years. When the school reaches its planned enrollment level at the end of three years, the school would transition from serving 766 students in 2013-2014 to serving approximately 525-555 students in 2016-2017.

By reducing J.H.S. 131's enrollment it is possible to introduce a new school into the building and still ensure that all schools in the building will receive at least their baseline (or adjusted baseline) Footprint allocation of space. As indicated in the BUP, both J.H.S. 131 and Soundview Academy are currently operating above their instructional Footprint. Given this excess space, along with the space that will become available as a result of the enrollment

reduction, the X131 building has the capacity to accommodate all of the existing and proposed schools during and after SA – New York 2’s proposed phase-in period.

Additionally, in buildings that include a charter school, there is also a Shared Space Committee, which meets at least four times per year, and includes the principal, a teacher, and a parent from each co-located school. This committee monitors the implementation of the shared space schedule, and identifies areas of concern that can be addressed by the Building Council. According to Chancellor’s Regulation A-190, the Shared Space Committee shall be comprised of the principal, a teacher, and a parent from each co-located school. With respect to a non-charter school’s teacher and parent members, such Shared Space Committee members shall be selected by the corresponding constituent member of the SLT at that school.

Comments 4(d, e) voice concern about the lack of administrative space for schools in the building.

The Citywide Instructional Footprint (the “Footprint”) is the guide used to allocate space to all schools based on the number of class sections they program and the grade levels of the school. The number of class sections 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 in a class section) for each grade level. The full text of the Instructional Footprint is available at: http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

The Footprint is applied to both DOE and public charter schools to ensure equitable allocation of classroom, resource, and administrative space. 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 class sections per grade. Both J.H.S. 131 and Soundview Academy will receive their Footprint allocation of space, including administrative space, over the course of the proposal. How a school chooses to use its administrative allocation is at the decision of principal and the school.

Comments 3(b) and 5(b) voice the concern that teachers at J.H.S. 131 and schools in the Bronx are not given the resources they need.

Funding in schools’ budgets is allocated on a per pupil basis, based on current Fair Student Funding (“FSF”) per capita allocation levels. Schools receive additional funds for students with disabilities, English Language Learners, and those with other supplemental academic needs. 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. While every school across the city receives funding via the same formula, some schools have been less successful in serving students than their peer schools that serve similar populations.

Comment 6 expresses support for J.H.S. 131 and its new principal.

The DOE also acknowledges and commends the hard work of the students and staff at J.H.S. 131.

While the DOE notes the some J.H.S. 131 students have achieved various positive outcomes, J.H.S. 131 has been identified as struggling to serve all of its students, and reducing the enrollment is a way to help the school focus on a smaller cohort of students under the leadership of the same principal.

Comments 7(a, b) voice concern over the class sizes at J.H.S. 131.

Due to the planned enrollment reduction, over time, J.H.S. 131’s enrollment will decrease, and as a result the number of rooms the school is allocated will decrease. Space is allocated to J.H.S. 131 and the other schools in the X131 building according to the Footprint, and J.H.S. 131 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 will increase at J.H.S. 144, or for that matter, or at Soundview Academy.

Comment 8 suggests that students will have to travel far from home to attend the new elementary school.

If this proposal is approved, families in District 8 will have the option of entering the charter application lottery process in spring 2014 to enroll in SA – New York 2 for the 2014-2015 school year if they so desire. Students will continue to have their zoned elementary school as an option, thus families can choose how far they are willing to travel to attend a particular school.

Additionally, SA – New York 2 will give priority to all students within District 8, but the DOE anticipates that the new school may attract a large number of applicants from the Soundview neighborhood specifically since that is where the school will be located if this proposal is approved.

Comments 9, 13(e), and 18 voice concern about the scheduling and space allocation challenges that may be encountered when multiple school organization are co-located in one building.

The DOE seeks to fully utilize all of its building capacity to serve students. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend school. There are currently hundreds of schools in buildings across the City that are co-located and some of these co-locations involve multiple DOE schools. In all cases, the Footprint is applied to ensure equitable allocation of classroom, resource and administrative space.

As mentioned above in response to comments 4(d, e), the Footprint is the guide used to allocate space to all schools based on the number of class sections they program and the grade levels of the school. The number of class sections 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 in a class section) for each grade level.

The BUP attached to the EIS for this proposal states the number of class sections each school is expected to program each year through the 2018-2019 school year, and allocates the number of classrooms accordingly. The BUP demonstrates that there is sufficient space in the building to accommodate the proposed co-location.

The BUP also contains a proposed Shared Space Plan for the co-located schools, which outlines the duration of time each of the co-located schools will have in each of the shared spaces in building X131, including the library, as inquired about by commenter 18. The Shared Space Plan is based upon total projected enrollment of each school in the first year of implementation and other relevant factors. Although the DOE has proposed how the shared spaces in the building may be utilized, the Building Council, consisting of the principals of all schools in the building, are 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 feasible and equitable, provided that the Building Council comes to an agreement of the final Shared Space Plan collaboratively. If this proposal is approved, the current principals and the principal of the proposed new school would sit on the Building Council, and would create a plan for the allocation of shared spaces. The Building Council meets regularly to address issues related to space allocations and shared space usage.

Comment 12(d) voices concern that training a new school around safety protocols for the school will burden the Building Response Team.

In order to ensure the safety of students, all school buildings must also establish a Building Response Team (“BRT”) that will consist of trained staff members from each school in X131, 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. As the commenter voiced, the current schools in the building work together around safety issues, and the DOE believes that the School Safety Committee will continue to work together around training new members.

Comments 13(a, b) relate to the increase in demand and potential increase in enrollment at Soundview Academy.

The enrollment projections in the EIS are based on current enrollment at J.H.S. 131 and Soundview Academy at the entry point grade level, and assume that the same number of students will age up. For Soundview Academy specifically, the projections assume stable incoming enrollment at the entry point grade. The DOE will closely monitor any changes in enrollment at Soundview Academy's demand. Enrollment for each school will be carefully evaluated to ensure that appropriate seat targets are established on an annual basis. In addition, the DOE notes that all schools in the X131 building will receive excess spaces above their Footprint allocation for the 2014-2015 school year and beyond if this proposal is approved.

Comments 15, 13(d, f, g), and 17 express support for Soundview Academy and the programs it offers.

The DOE acknowledges and commends the hard work of the principal, staff, and students of Soundview Academy. Soundview Academy will continue to offer extracurricular programming based on student interests, available resources, and staff support for those programs. The proposed co-location is not expected to impact those opportunities. Additionally, the proposal is not expected to impact the admissions process or enrollment at Soundview Academy.

Changes Made to the Proposal

No changes have been made to this proposal.