



**Public Comment Analysis**

Date: December 19, 2012

Topic: The Proposed Co-location of Excellence Girls Charter School (84K712) with Existing School P.S. 191 Paul Robeson (17K191) in Building K191 Beginning in 2013-2014

Date of Panel Vote: December 20, 2012

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**Summary of Proposal**

In an Educational Impact Statement (“EIS”) and Building Utilization Plan (“BUP”) posted on October 25, 2012, the New York City Department of Education (“DOE”) proposed to co-locate the fifth through eighth grades of Excellence Girls Charter School (84K712, “Excellence Girls”) in building K191 (“K191”). Excellence Girls is an existing public charter school serving students in kindergarten through fourth grade in building K309 (“K309”) at 794 Monroe Street, Brooklyn, NY 11221, in Community School District 16. Under this proposal, Excellence Girls’ fifth through eighth grades would be co-located with P.S. 191 Paul Robeson (17K191, “P.S. 191”) in building K191, located at 1600 Park Place, Brooklyn, NY 11233, in Community School District 17. P.S. 191 is an existing DOE school that currently serves zoned students in kindergarten through fifth grades and offers a full-day pre-kindergarten program. P.S. 191 is the only existing school in K191. 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.

In Summer 2008, Excellence Girls’ charter was authorized by the State University of New York Charter Schools Institute (“SUNY CSI”) to serve students in kindergarten through fifth grades. Excellence Girls is managed by Uncommon Schools (“Uncommon”), a charter management organization. Excellence Girls has informed the DOE that it intends to apply to SUNY CSI to expand its grade span to serve students in kindergarten through eighth grades, reaching full scale in 2016-2017. Only SUNY CSI has the authority to approve or deny that request. This proposal to co-locate Excellence Girls in K191 is contingent upon Excellence Girls’ application for an expansion of its charter authorization and SUNY CSI’s approval of any such application. Should SUNY CSI deny any such request by Excellence Girls to expand, this EIS and the accompanying BUP will be revised as necessary. For the purposes of this proposal, it is assumed that Uncommon will apply to SUNY CSI to expand its grade span and that SUNY CSI will approve Uncommon’s application.

Under this proposal, Excellence Girls will begin enrolling fifth grade students in K191 for the 2013-2014 school year, continuing to add one grade each year until it serves students in fifth through eighth grades in 2016-2017, and will increase enrollment for one year after that until it reaches a total

enrollment of 252-321 students in 2017-2018. At that point, it will serve its elementary school grades (K-4) in K309 and its middle school grades (5-8) in K191. Excellence Girls elementary school students will be automatically eligible to articulate in Excellence Girls' middle school grades. Any remaining available seats will be filled through the charter lottery process. Additional information about Excellence Girls' charter lottery process can be found in Section III.A.

K191 has been identified as an under-utilized building. According to the 2011-2012 Enrollment Capacity Utilization Report (the "Blue Book"), K191 has the capacity to serve 661 students. In 2012-2013, P.S. 191 is projected to serve 223 students in kindergarten through fifth grades and 18 students in pre-kindergarten, for a total of 241 students. This yields a building utilization rate of approximately 36%. This means that the building is "underutilized" and has space to accommodate additional students. Under this proposal, when Excellence Girls is at full scale in 2017-2018, it is projected to serve 252-321 students. P.S. 191 is projected to serve 248-308 students that year, for a total of 500-629 students, yielding a projected utilization rate of 76%-95%. Thus, K191 has sufficient space to accommodate the proposed co-location. The DOE does not anticipate that the proposed co-location will affect the pre-kindergarten program at P.S. 191.

The details of this proposal have been released in an EIS which can be accessed here along with the BUP: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2012-2013/Dec2012Proposals.htm>.

Copies of the EIS and BUP are also available in the main office of P.S. 191.

### **Summary of Comments Received at the Joint Public Hearings**

A joint public hearing regarding the proposal was held at P.S. 191 on December 3, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 60 members of the public attended the hearing, and 30 people spoke. Present at the meeting were District 17 Superintendent Buffie Simmons; District 17 Community Education Council ("CEC 17") President Claudette Agard; CEC 17 and SLT member Marvin Wheeler; P.S. 191 Principal Lola Padin; SLT Member Jesse Butler; Laurie Price from the Department of Education; and Savita Iyengar from the Department of Education.

The following comments and remarks were made at the joint public hearing on December 3, 2012:

- 1) Marvin Wheeler, CEC 17 member and P.S. 191 SLT member expressed the following:
  - a) We do not need another charter school in this district. No one from the school community ever asked for this charter school, or choice.
  - b) He is concerned about contact information, including addresses, for students in the area being given to charter schools.
  - c) He is concerned with sharing space.
- 2) Jesse Butler, member of the SLT, stated the following:
  - a) He is concerned with the influence of older kids on younger students.
  - b) The school is already overcrowded.

- c) Other schools with performance concerns could benefit from this co-location. Taking away space from a high performing school is not fair.
- 3) CEC President Claudette Agard, stated the following: The charter application indicated District 16 (“D16”), yet Excellence Girls is being sited in District 17 (“D17”), and their goals do not align with D17’s needs. She is curious why they did not look to expand in D16. There are specific populations with needs in D17 and girls are not one of them. This school is not the right fit at this time. The DOE has not given evidence that there are enough D17 students in Excellence Girls to warrant co-location.
- 4) A parent of an Excellence Girls student stated the following:  
I support co-location. The middle aims to provide another great option in D17 and work in partnership with the community to make sure every student receives the best education. Parents dream of the best for our children - college education and graduation. The reality is that it takes a lot of effort. Excellence Girls is a college preparatory school. 7 out of 10 graduate from a 4 year college. The Excellence Girls population is thankful and will continue our track record of being a good neighbor.
- 5) A parent of an Excellence Girls student stated the following:  
Excellence Girls students and families are great partners in shared space. We care about education of all kids in the building. Learning honesty, loyalty, sisterhood and respect.
- 6) A parent of an Excellence Girls student stated the following:  
I support co-location. I am appalled at adults that say they don't want to share. Parents and educators should set aside personal feelings and look out for our children. I am a nurse at Excellence Girls and have seen how a co-location can be helpful. We are not here to take over, we are here to expand what we have built. Lets work together to support our children
- 7) A parent of an Excellence Girls student stated the following:  
I know from experience having a building co-located and not co-located. Excellence Girls is not here to take away from P.S. 191 - we are here to add. We have children that are raised with standards of respect. The children will look at the building with respect and look for all adults for guidance. We ask that P.S. 191 welcome us into the building. Lets work together not against each other.
- 8) A grandparent of an Excellence Girls student stated the following:  
The Excellence Girls teachers work to make sure that children have every opportunity. They are taught respect, sisterhood, and not to bully. They bring their problems to a table and learn how to discuss them. My granddaughter wants to attend Yale and Princeton. I feel that it would be a plus for Excellence Girls to come into this district.
- 9) Marvin Wheeler, CEC 17 member and P.S. 191 SLT member, also spoke in his capacity as a member of the community, and stated the following:
- a) The DOE has not addressed the fact that this new school starts with fifth grade, but every surrounding school is K-5. This model is chopping up the schools.
  - b) Excellence Girls will be taking over because they will be bringing students and sharing everything.
  - c) Excellence Girls should go back to the other districts where they’ve already been accepted.
- 10) A P.S. 191 teacher stated the following:
- a) P.S. 191 has been an educational home for many students for a very long time. For 15 years, the culture has flourished with love and support for students and parents. P.S. 191

- is a facility that provides support from every adult. The Principal and AP have provided a wonderful atmosphere.
- b) The school provided a dance studio and built this auditorium. Excellence Girls will affect our school community and culture - we can't let this happen.
- 11) A P.S. 191 teacher stated the following:
- a) In 2010-2011, P.S. 191 was put on the list of schools in need of improvement. In 2011-2012, the school was proud to announce that we improved enough that it no longer needed improvement. In 2011-2012, we were number one in D17 for moving our students to a less restrictive environment. P.S. 191 was able to do this because they provided the resources students needed. They have a number of professionals that provide services both in the classroom and outside. The school can do this because of the multi-modality teaching methodology and technology provided in the classroom.
- b) Co-location means teachers would no longer have their own classrooms. We wouldn't be able to provide pull out services as needed.
- c) We won't be able to help students that are suffering from additional issues outside the school.
- 12) A P.S. 191 teacher stated the following:
- a) I am not here to speak against charter schools, but to explain why siting here is not the right fit. Excellence Girls' charter school statement states that the school's goal is to have their students excel and be college ready. We have the same expectations at P.S. 191 of both boys and girls in our student body. Our administration has worked hard to ensure that our students have the necessary resources, dedicated staff, and tools to achieve. These are necessities.
- b) We believe in multi-modality - students learn in a variety of ways. This is why we have a computer lab, dance studio, multi sensory room, auditorium, full fledged playground. Bringing Excellence Girls will encroach upon our students learning and this should not be taken away.
- 13) A P.S. 191 guidance counselor stated:
- a) I do not believe the building can be partitioned off.
- b) We have excellent and very experienced leadership, including a genius principal who has instituted many policies and principles. We do not believe this leadership's abilities should be compromised for an outside group. I know we are dealing with children all around.
- c) This is a rich cultural environment. Instituted programs include violin, music, as well as teachings on Mozart and Aristotle. Students participate in picnics in the yard which teaches them to improve their social skills.
- 14) A P.S. 191 school psychologist stated:
- a) P.S.191 creates a safe haven due to its small size. All adults can take an active role. Students know each other and all of the staff. The presence of a charter school will jeopardize this culture.
- b) The age difference will change the feeling of safety and security. Excellence Girls' -kids are older and larger.
- c) Each adult currently has their own office. This would be compromised. Changes in space would have an impact.
- 15) A P.S. 191 school aide stated:
- a) Our building is not a good match for a charter school for girls.

- b) We are trying to keep our school as it is, a B school.
  - c) The charter school is taking away from P.S. 191 because our PE has been taken away. We give our kids extra gym because our kids are not safe going to the park.
- 16) A P.S. 191 teacher stated the following:
- a) This school is a powerhouse. We have implemented many policies that other schools have taken as well. What does Excellence Girls bring to the table?
  - b) We will be forced to make many concessions, including sharing the gym, etc.
- 17) A P.S. 191 teacher stated the following:
- a) We will need to close down a number of bathrooms that can only be used for girls. There is a large male population at P.S. 191.
  - b) The building will have to accommodate the girls, and won't accommodate the boys. P.S. 191 girls and Excellence Girls girls won't get along. More kids are going to take away from our kids.
- 18) A P.S. 191 social worker stated the following:
- a) We deal with very hard to serve children. We often have to do home visits. To really service this neighborhood, we need the entire building.
  - b) There are a lot of boys in 191. A lot of the work we do in the building is geared to service this very needy population.
  - c) We have seen a lot of co-locations and have never seen a glorious fit.
- 19) An Excellence Girls parent stated the following:  
We are talking about separation and we shouldn't be. All children deserve a good education. The current co-location for K-4 is working. There is not a lot of co-mingling of the students. We are able to manage shared spaces and parent interaction. I hope we figure out a way to work together and be great neighbors.
- 20) A P.S. 191 teacher stated the following:
- a) P.S. 191 has many at risk students that don't have the opportunity to participate in sports after school, as, for example, their mom can't drive them to soccer. They get all their physical education within school hours - this is how they learn a multitude of skills. A new school is taking away our gym time.
  - b) Students with 12:1:1 designation get ICT and also pull out services. If another student takes over the rooms, this child is losing out on their services.
- 21) A P.S. 191 teacher stated the following:
- a) P.S. 191 services every child even with special education needs or behavioral problems. We would not have room to serve our students the way we want to serve them.
  - b) Why are Excellence Girls' fifth through eighth grade students separated from their kindergarten through fifth grade?
  - c) The children in lower grades emulate the behavior of these new older students that will be in the building. Fifth through eighth grades are not a great fit for our school.
- 22) A P.S. 191 parent coordinator stated the following:
- a) P.S. 191 students don't have a park to play in. There is a high population of students housed in shelters. We have to provide extra services that are not provided in the community or at home - e.g. dance studio and playground. Our students need extra gym time, and a multi sensory room. I have a problem with another school coming in and taking away our time in these spaces.
- 23) A P.S. 191 teacher stated the following:

- a) We worked hard to get a playground, computer lab, and dance studio. Our space is limited. This is not a good fit.
  - b) The snow and rain pose safety concerns with so many kids.
- 24) A P.S. 191 family worker and parent stated the following:
- a) P.S. 191 is a B school. We will be an A school. We will not accept this.
- 25) A P.S. 191 teacher stated the following:
- a) I have a daughter at P.S. 191 who is an ELL. I don't believe a new school can fit here because this building already has everything we need for our daughter.
- 26) A P.S. 191 teacher stated the following:
- a) P.S. 191 has similar aspirations as Excellence Girls. What will Excellence Girls offer us? I can't find anything. But we will lose our playground. There is only one in the neighborhood and its not safe. We need this playground for social reasons.
  - b) The "extra" space is used to help students that are not working productively in a regular classroom.
  - c) I am concerned about safety during arrival and dismissal times. There are no speed bumps or signs to indicate that there is a school. Think about the additional students and the additional cars brought in. This will not be a safe environment.
  - d) I am concerned about the age range. Pre-kindergarten will be mixed with older students.
- 27) An Excellence Girls parent stated:
- I chose to send my sons to Excellence Boys. Our schools are co-located as well. I have a son that has special needs and he is being served by Excellence Boys.
- 28) A P.S. 191 teacher stated the following: P.S. 191 has created a welcome environment that we want to remain as is. I take objection with the fact that this building is "under-utilized" - this building is not underutilized.
- 29) An Excellence Girls parent stated: Excellence Girls is very important to the neighborhood and community. Excellence Girls has been sharing space in K309 for 3 years. We would love a partnership between the two schools to serve all of our daughters.

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

- 30) A commenter stated:
- I have a daughter that will be attending Excellence middle academy next year. I believe that both schools can benefit from Co habitating as we both can learn from each other. Our girls are polite, well mannered, and very respectful. Both schools have our kids best interests at heart, which is to provide quality education. We are just asking for a place to provide this great opportunity.
- 31) A commenter stated:
- I am a parent of 2 wonderful elementary school children in Brooklyn. 1 of my children attends school in CSD 16 and the other in CSD 23. I am also a member of CEC 16. I am writing today in support of the co-location of Excellent Girls Middle School with PS 191. My daughter is still on the wait-list for Excellence Girls. It is a wonderful school where the girls are taught to be great partners in shared space, a strong sense of sisterhood and commitment to their academic studies as well as their families and community as a whole. They will be a

great addition to CSD 17 and PS 191. I would like to see all children have access to an excellent public education - my daughter is still waiting. Please do not force our girls to wait for their middle school - allow them to continue their great work in pursuit of excellence.

32) A commenter stated:

I am in support of the co-location. Excellence Girls teaches the scholars love and respect. Co-locating with P.S. 191 will not cause any distraction or problems. Our scholars know the importance of respect and demonstrate it everyday to one another and within their various communities.

**The DOE received a number of comments at the joint public hearing which do not directly relate to the proposal and therefore, will not be addressed. Those comments are summarized below.**

- a) The CEC is formulating a more detailed response. We are opposed to this process.
- b) In 2017 we'll be voting for a new president and mayor. We can't go by the same guidelines and projections that we have now. The mayor will no longer be in office and the new leadership will not allow this. We currently have a mayor that is also running the board of education. We have a problem when the board of education can't make a decision without calling the mayor. The new mayor and chancellor will be more independent.
- c) Excellence Girls is not going to accommodate my kids - I have 2 boys. They can't go to the school.
- d) P.S. 191 doesn't turn any child away based on sex, special needs, etc.
- e) My child goes to this school. I had the opportunity to put my child in any school and I chose this one.
- f) Many kids have left to go to a charter and then returned because it doesn't go the way its supposed to.
- g) P.S. 191 students excel. We earned our right to be a B school.

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

Comments 4, 5, 6, 7, 8, 19, 27, 29, 30, 31, and 32 are in favor of the proposal and do not require a response.

Comments 1(c), 2(b), 2(c), 9(b), 10(b), 11(a), 11(b), 12(b), 13(a), 14(c), 15(c), 16(b), 20(a), 22(a), 23(a), 26(a), 26(b), and 28 concern space allocations and sharing of space between P.S. 191 and Excellence Girls. They contend that there is no space for an additional school.

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

The DOE seeks to fully utilize all its building capacity to serve students. The DOE does not distinguish between students attending public charter schools and students attending DOE schools. In all cases, the DOE seeks to provide high quality education and allow parents/students to choose where to attend.

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. We believe this is the minimum amount of space required for a school to program effectively. 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. At the middle school and high school levels, the Footprint assumes every classroom is programmed during every period of the school day except one lunch period. 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](http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf).

The BUP details the number of class sections each school is expected to program each year and allocates the number of classrooms accordingly. The assignment of specific rooms and location for each in the building, including those for use in serving students with IEPs or special education needs, will be made in consultation with the Principals of each school and the Office of Space Planning if the proposal is approved. The BUP demonstrates that there is sufficient space in the building to accommodate the proposed co-location.

The Building Utilization Plan puts forth a **proposed** shared space schedule for the co-located schools. The final shared space schedule will be decided upon by the Building Council if this proposed co-location is approved by the PEP.

If the Principals are unable to agree upon a schedule for shared spaces, there is a mediation process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

A building’s target utilization rate is calculated by dividing the aggregated enrollment of all the school organizations in the building by the aggregated “target capacities” of those organizations. Each school organization’s “target capacity” is calculated based upon the scheduled use of individual rooms as reported by principals during an annual facilities survey, the DOE’s goals for maximum classroom capacities (which are lower than the UFT contractual class sizes and differ depending on grade level), and the efficiency with which classrooms are programmed (i.e., the frequency with which classes are scheduled in a given classroom).

This is described in more detail in the Enrollment, Capacity, Utilization Report (“Blue Book”), which is available at [http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Enrollment/2011-2012\\_Classic.pdf](http://www.nycsca.org/Community/CapitalPlanManagementReportsData/Enrollment/2011-2012_Classic.pdf).

The most recent year for which target capacity has been calculated for buildings is 2011-2012. The DOE's projected utilization rates for the 2013-2014 school year and beyond are based on the 2011-2012 target capacity, which assumes that the components underlying that target capacity (scheduled use of classrooms, goal classroom capacity, etc.) remain constant. Thus, projected utilization rates for 2013-2014 and beyond provide only an approximation of a building's usage because each of the factors underlying target capacity may be adjusted by principals from year to year to better accommodate students' needs. For example, changing the use of a room from an administrative room to a homeroom at the high school level will increase a building's overall target capacity because for high schools administrative rooms are not assigned a capacity. Holding enrollment constant, this change would result in a lower utilization rate. Similarly, if a room previously used as a kindergarten classroom is subsequently used as a fifth grade classroom, the building's target capacity would increase because we expect that a fifth grade class will have more students than a kindergarten class. This is reflected in the fact that the DOE's goal for maximum classroom capacity is higher for fifth grade classrooms than for kindergarten classrooms. In this example, as well, assuming enrollment is constant, the utilization rate would decrease.

Comments 20(b), 21(a), 25(a) concern P.S. 191's need for space to service their special needs population.

P.S. 191 does not currently serve any self-contained sections. Pursuant to the Footprint, self-contained sections should be served in half-size instructional spaces. In the 2012-2013 school year, P.S. 191 does not currently serve any self-contained special education sections. However, P.S. 191's final space allocation includes five half-size rooms above their baseline footprint. Additionally, ELL students at P.S. 191 will also continue to receive mandated services.

Comments 2(a), 14(b), 21(c), and 26(d) concern the varying grade levels as a result of co-location.

It is not unusual for varying grade levels to be co-located together. There are several successful examples of K-12 buildings or campuses in New York City.

These examples include:

- The Julia Richman Educational Complex, which houses four small high schools, a K-8 school, and a District 75 program;
- Mott Hall IV, a middle school, which shares a building with Eagle Academy for Young Men II, which currently serves sixth through eighth grade, and Leadership Preparatory Ocean Hill Charter School, which currently serves kindergarten and first grade;
- Harlem Success Academy 4, an elementary school, which shares a building with Opportunity Charter School, which serves sixth through twelfth grade in District 3; and
- J.H.S. 13 Jackie Robinson, a middle school, which shares a building with Central Park East I, an elementary school, and Central Park East High School.

Comments 1(a), 9(c), 10(a), 12(a), 13(b), 13(c), 14(a), 15(a), 15(b), 16(a), 18(c), and 24(a) voice general opposition to the proposal.

The DOE notes there is a need for increased options for students in the Brooklyn, including those students in District 17. The DOE strives to ensure that all students in New York City have access to a high-quality school in an appropriate environment at every stage of their education. This proposal aims to provide a new high quality option for these students.

Comment 17(b) refers to a co-location with an all-girls school.

Due to space limitations, it is not unusual for varying student populations to be co-located together. There are several successful examples of buildings or campuses in New York City with varying age groups and backgrounds. One successful example of a co-location is Girls Preparatory Charter School, an all girls elementary school, which shares a building with M.S. 302 Luisa Dessus Cruz, a junior high school in District 8.

Comments 9(a) and 21(b) question the grade splits of Excellence Girls, which serves its K-4 grades at a different site than its proposed 5-8 grades.

Excellence Girls is an existing public charter school serving students in kindergarten through fourth grade in building K309 (“K309”) at 794 Monroe Street, Brooklyn, NY 11221, in Community School District 16. This building does not have enough space to accommodate Excellence Girls’ fifth through eighth grades. The school’s decision to split K-4 from 5-8 is based on an instructional model that is commonly used among charter schools.

Comments 23(b) and 26(c) question the safety of a co-location.

Pursuant to Chancellor’s Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The 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.

Comments 11(c), 18(a), and 18(b) assert that P.S. 191 serves an extremely hard to serve population and the proposed co-location would inhibit the school’s ability to continue to successfully serve these students.

As stated previously, the DOE seeks to fully utilize all its building capacity to serve students. In allocating space, the DOE does not distinguish between the performance or populations of schools when applying the Footprint. Similarly, the DOE does not distinguish between students attending public charter schools and students attending DOE schools.

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.

Comment 17(a) addresses the issue of sharing of bathrooms.

Specific decisions around bathroom allocations and building configuration are made by the Office of Space Planning in conjunction with the Building Council. In many buildings where schools are co-located, each school is assigned bathrooms on the floors or hallways of their classrooms and specific stairways for students to use. These measures are taken to cultivate cohesive cultures within each school. Separation between schools is intended to limit any issues that might arise from groups of students who may not know each other well and to nurture school unity. The intention is not to be punitive to any one group of students. If the assignment of specific bathrooms is not working or is inadequate, the Building Council can discuss an alternative arrangement.

Comment 3 addresses the fact that Excellence Girls' charter application indicates a preference for District 16 and questions why the expansion isn't in that district.

Charter schools are public schools that operate independently according to the terms of a five-year performance contract or "charter." In order for the charter school to open, it must first apply and be approved by their "authorizers," state-sanctioned bodies with the power to create or renew charters.

In New York City, there are currently two authorizers; New York State Education Department ("SED") and SUNY CSI.

To determine proposed co-location sites, the DOE looked at both District 16 and 17 due to the significant current student enrollment from each, and found K191 to be the most suitable space.

Comment 1(b) states concern regarding the distribution of personal contact information of District 17 residents to Uncommon for recruiting purposes.

The DOE supports charter schools' efforts to do outreach and recruitment that assure the availability of information to students in the community about their school options.

### **Changes Made to the Proposal**

No changes have been made to this proposal.