



Public Comment Analysis

Date: March 20, 2012

Topic: The Proposed Co-location of Leadership Preparatory Brownsville Charter School’s (84K711) 5-8 Grades with Existing School P.S. 284 Lew Wallace (23K284) Beginning in 2013-2014

Date of Panel Vote: March 21, 2012

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to co-locate Leadership Preparatory Brownsville Charter School’s (84K711, “LPBV”) fifth through eighth grade (“5-8”) students in building K284 (“K284”), located at 213 Osborn Street, Brooklyn, NY 11212, with P.S. 284 Lew Wallace (23K284, “P.S. 284”), an existing zoned school serving students in kindergarten through eighth grade (“K-8”) and offering a full-day pre-kindergarten program. LPBV is an existing public charter school that currently serves 245 kindergarten through third grade (“K-3”) students. LPBV is in the process of phasing in and is expanding by one grade each year until it reaches full scale and serves 595-760 K-8 students in 2016-2017. LPBV’s K-3 students are currently co-located with P.S. 284 in K284. However, the DOE recognizes that K284 does not have sufficient space to serve all of LPBV’s K-8 students. Thus, in a separate Educational Impact Statements (“EISs”) published in January 2012, the DOE has proposed to re-site LPBV’s K-3 students to building K275 (“K275”), located 985 Rockaway Avenue, Brooklyn, NY 11212, and to co-locate its kindergarten through fourth grade (“K-4”) students in K275 with an existing middle school, Knowledge and Power Preparatory Academy V (23K518, “KAPPA V”), and two existing transfer high schools: Metropolitan Diploma Plus High School (23K647, “Metropolitan Diploma Plus”) and Brooklyn Democracy Academy (23K643, “Brooklyn Democracy”) beginning in the 2012-2013 school year. If both this proposal and that proposal are approved, LPBV’s K-4 students will be served in K275, and its 5-8 students will be served in K284.

LPBV will continue to enroll students through the charter lottery process. Additional information about LPBV’s charter lottery process can be found in the EIS.

According to the 2010-2011 Enrollment, Capacity, Utilization Report (“the Blue Book”), K284 has a target capacity to serve 707 students. Currently, it serves 782 students, which yields a utilization rate of 111%. If the proposal to re-site and co-locate LPBV’s K-4 students is approved, in the 2012-2013 school year, P.S. 284 would be the sole school organization housed

in K284. However, if this proposal is approved, in the 2013-2014 school year, LPBV will serve 45-58 fifth grade students in K284 and will expand to serve 215-274 5-8 students at full scale in K284 in the 2016-2017 school year. There would thus be approximately 673-822 total students served in K284 in 2016-2017, which yields a projected utilization rate of approximately 95%-116%.

Although a utilization rate in excess of 100% may suggest that a building will be over-utilized or over-crowded in a given year, this rate does not account for the fact that rooms may be programmed for more efficient or different uses than the standard assumptions in the utilization calculation.

Copies of the EIS and BUP describing this proposal can be found in the main offices of LPBV and P.S. 284 and can also be accessed on the DOE's Web site at:

<http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm>.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held on February 29, 2012 at K284. At this hearing, interested parties had an opportunity to provide input on the proposal. Approximately 37 members of the public attended the hearing, and 10 people spoke.¹ Present at the meeting were the Chancellor's Designee, Community School District 23 Superintendent Ainslie Cumberbatch; District 23 Community Education Council ("CEC") Member, Milton Bolton Williams; State University of New York ("SUNY") Representative, Thomas Franta; P.S. 284 School Leadership Team ("SLT") Representative, Keisha Ferguson; and LPBV Representative, Analiza Quiroz Wolf.

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

1. The CEC representative stated that:
 - a. The proposal should have been distributed earlier. The CEC was only notified on the morning of the joint public hearing about the proposed co-location.
 - b. If LPBV's K-3 grades are to leave K284, then P.S. 284 should receive the space LPBV vacates so that P.S. 284 and the existing community based organization in the building should be given the space to serve support P.S. 284's student population.
 - c. Parents who might oppose this proposal are not present tonight.
2. The P.S. 284 SLT representative stated that P.S. 284 would like to use the space currently occupied by LPBV's K-3 grades rather than having it occupied by LPBV's 5-8 grades.

¹ The joint public hearing at K284 was also held to solicit public comments concerning the proposed re-siting Leadership Preparatory Brownsville Charter School's (84K711) kindergarten through third grade and co-location of Leadership Preparatory Brownsville Charter School's kindergarten through fourth grade with KAPPA V, Metropolitan Diploma, and BK Democracy in building K275 in 2012-2013. The comments solicited at this hearing that relate to that proposal are set forth in a separate analysis of public comments available here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm>.

3. The LPBV SLT representative expressed respect for P.S. 284's principal and staff, and reiterated that LPBV will continue to work collaboratively with P.S. 284 in the building. Additionally, the LPBV SLT representative stated that she hopes the future relationship between LPBV and P.S. 284 will be respectful if and when LPBV's 5-8 grades are co-located with P.S. 284.
4. Multiple commenters expressed support for LPBV and the proposed co-location of LPBV's 5-8 grades in K284.

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

The DOE did not receive any written or oral comments about this proposal.

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

Comments 1(a,c) concern engagement and mediums for submitting feedback.

Contrary to the CEC representatives claim that the CEC was only notified of the proposed co-location on the morning of the joint public hearing, the DOE is committed to engaging with the community, including its elected representatives, for all proposals that require a significant change in school utilization, as detailed in Chancellor's Regulation A-190. The DOE issued the EIS describing this proposal on January 26, 2012, and physical copies were sent to the CEC. The CEC was directly involved in scheduling the joint public hearings for this proposal, and the CEC was alerted on January 26, 2012 that the hearings for this proposal would be held at K284 on February 29, 2012 and at K275 on March 1, 2012.

With respect to members of the public who could not attend either joint public hearing and who wish to submit a comment regarding this proposal, the DOE has accepted and will continue to accept community feedback regarding this proposal via a dedicated phone line and a dedicated email address. The DOE will continue to engage the community at every possible point regarding this and other proposals for the upcoming 2013-2014 school year.

Comments 1(b) and 2 concern space allocations in K284.

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 Citywide Instructional Footprint, which guides space allocation in all City schools, 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 and does not distinguish between students attending public charter schools and students attending DOE schools.

Currently, LPBV's K-3 grades and P.S. 284 are co-located in K284. In 2011-2012, their combined enrollment is 782, which yields a target utilization rate of 111%. In 2012-2013, when P.S. 284 will be the sole school organization in K284, K284's projected building utilization will only be 68%-81%. Building space is scarce in many New York City neighborhoods. Given this

reality, the DOE must use its existing buildings in the most efficient manner possible. Thus, the DOE believes that co-locating LPBV's 5-8 grades in K284 with P.S. 284 would use the space efficiently and would allow LPBV to continue to serve its students in District 23.

The Footprint allocates 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. As stated in the Building Utilization Plan ("BUP"), 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 its homeroom throughout the day except for when it is scheduled for a cluster activity (i.e. art) or lunch, recess, etc. Further, this assumes that at those times the homeroom classroom remains empty. Therefore, the Footprint allocates one full-size room for each general education or Integrated Co-Teaching section and a full-size or half-size room to accommodate each self-contained special education section served by the school. In addition to these rooms, schools serving grades kindergarten through five receive an allocation of cluster or specialty rooms proportionate to the number of students enrolled. These spaces can be used at the principal's discretion for purposes such as art and/or music instruction, among other things. Also, 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 Footprint is available at 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 Individualized Educational Programs 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. Please refer to the BUP for further details: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2011-2012/Mar212012Proposals.htm>.

Comments 3 and 4 express support for the proposed co-location, and therefore do not require any further analysis.

Changes Made to the Proposal

No changes have been made to this proposal.