



Amended Public Comment Analysis

Date: March 23, 2011

Topic: The Proposed Temporary Co-location of a New Public Charter School, East Harlem Scholars Academy Charter School (84MTBD), with Existing Schools Central Park East I (04M497), Central Park East High School (04M555), and J.H.S. 013 Jackie Robinson (04M013) in Building M013

Date of Panel Vote: March 23, 2011

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to open and temporarily site East Harlem Scholars Academy Charter School (84MTBD, “East Harlem Scholars”), a new public charter school that would serve students in kindergarten through fifth grade, in Building M013 (“M013”), located at 1573 Madison Avenue in Manhattan, in Community School District 4. East Harlem Scholars would be co-located in M013 with Central Park East I (04M497, “CPE I”), J.H.S. 013 Jackie Robinson (04M013, “J13”), and Central Park East High School (04M555, “CPEHS”). 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.

This is a proposal to incubate East Harlem Scholars in M013 for two years: the 2011-2012, and 2012-2013 school years. Incubation means the school will not serve its full grade span during the period of this proposal. The DOE will evaluate the space available in M013 and other District 4 locations and will issue a new Educational Impact Statement (“EIS”) for the long-term siting of East Harlem Scholars based on the most appropriate space available for the 2013-2014 school year and beyond.

East Harlem Scholars will be managed by the East Harlem Tutorial Program (“East Harlem Tutorial”), a Community Based Organization (“CBO”) that has provided after-school education to 15,000 East Harlem students over 52 years. East Harlem Tutorial has been approved by its charter authorizer, the State University of New York (“SUNY”), to open a new public charter school in Community School District 4 in Manhattan. The school would open with kindergarten and first-grade classes in 2011-2012 and add one grade each year until it serves 270-300 students in kindergarten through fifth grade. However, as noted above, this proposal deals only with the siting of the school’s kindergarten and first grades in 2011-12, and its kindergarten through second grades in 2012-2013. If this proposal were approved, East Harlem Scholars would serve 90-100 students in kindergarten and first grade in 2011-2012. In 2012-2013, East Harlem Scholars would serve 135-150 students in kindergarten, first and second grades. The school would admit students via the charter school lottery application process, with preference to

District 4 residents. East Harlem Tutorial is already active in the M013 building, providing after-school programming to J13, CPEHS, and CPE I students.

M013 has the capacity to serve 1,291 students. In 2010, the building only served 873 students, including pre-kindergarten, yielding a utilization rate of just 68%. If this proposal to site East Harlem Scholars in M013 were approved, East Harlem Scholars would be co-located with J13, CPE I and CPEHS. In 2012-2013, when East Harlem Scholars serves kindergarten through second grade, there would be approximately 1,015-1,135 students served in the building by all four schools, yielding a building utilization rate of 79-88%.

The details of this proposal have been released in an Educational Impact Statement which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Mar232011Proposals.htm>. Copies of the EIS and BUP are also available in the main offices of Central Park East I, Central Park East High School, and J.H.S. 013 Jackie Robinson. The Public Comment Analysis for this proposal was initially made available on March 22, 2011. This amended Public Comment Analysis summarizes and analyzes additional comments made on the proposal during the joint public hearing described below.

Summary of Comments Received at the Joint Public Hearing

A joint public hearing regarding this proposal was held at Central Park East I / Central Park East High School / J.H.S. 013 Jackie Robinson on March 22, 2011. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 260 members of the public attended the hearing, and 37 people spoke. Present at the meeting were: Manhattan and Bronx High School Superintendent Geraldine Taylor Brown; Community School District 4 Superintendent Luz Cortazzo; Principal of Central Park East High School Bennett Lieberman; Principal of J.H.S. 013 Jacob Michelman; Principal of Central Park East I Julie Zuckerman; Community Education Council District 4 representative Marie Hines; CEC 4 representative and J.H.S. 013 School Leadership Team representative Angela Smith; Executive Director of East Harlem Tutorial Jeffrey Ginsburg; Representatives from DOE Portfolio Planning Elizabeth Rose, Benjamin Taylor, and Anyeli Matos.

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

1. A CEC 4 representative said parents have the right to choose the school for their child. There is no problem with the school coming in if there is room for the school and as long as the students in Building M013 will not lose anything. Hopefully, all four principals will work to make that happen.
2. Chairman of East Harlem Scholars board, Jeffrey Ginsburg, made several points:
 - a. He wants change, and the hearing is an example of change and advocacy.
 - b. The students at the hearing are a part of 15,000 people who have been a part of East Harlem Tutorial. The organization will be adding even more students.
 - c. Alumni and students are the proof of East Harlem Tutorial's success, which is why East Harlem Scholars wants the opportunity to temporarily live in the building.

- d. The large majority of those at the hearing in support East Harlem Scholars will not benefit from the school; rather, they attended the hearing because they care so deeply about East Harlem Tutorial.
 - e. East Harlem Scholars will be a great program for students regardless of where they come from, their language, or their income.
 - f. East Harlem Tutorial wants to keep being successful, and the neighborhood needs East Harlem Scholars. Only 25% of district students have made it to college. Though there is improvement in other parts of the city, there is not improvement here. 98% of East Harlem students have made it to college.
 - g. East Harlem Scholars will measure itself by student success, not by its equipment or building.
 - h. To clarify, this is a temporary location. 105th Street and 2nd Avenue is where East Harlem Scholars plans to build a permanent location, near the East Harlem Tutorial headquarters.
 - i. East Harlem Scholars wants to work with the schools in building M013. The organization has a long history of working with others. The organization has worked to tutor students in the schools in M013.
 - j. East Harlem Tutorial also played a large part in bringing about the remodeling of the playground.
 - k. East Harlem Scholars will be an English Language Learners preference school, a school of the community for the community.
3. A J13 SLT representative said her three oldest children attended the East Harlem Tutorial program, and it was a successful program then, as it is now. There is space in the building, so East Harlem Scholars should use it. The community needs more education and college-ready programs in the district.
 4. The Principal of CPE I, Julie Zuckerman, made several statements about the proposal:
 - a. Nobody is disputing that there is space in the building, and her school does not have a problem with East Harlem Tutorial. The organization has provided after-school programs to the three schools in M013.
 - b. CPE I is impacted by the proposal because there is a strongly felt need for a middle school option consistent with the program at CPE I. CPE I has applied three times for the school to extend through eighth grade. The first time, the DOE said there was not a need. The second time, the DOE said that there is no space for expansion. The following year CPE I was encouraged to submit an application, and it put in a letter of intent but decided as a school community not to go forward, as it had seemed that she, the CPE I principal, would be transitioning out of her position. However, after that, the school sent a letter stating that it would intend to expand the school anyways. Now, the school is faced with situation where the timetable for the school to expand is in flux. The flux of the timetable for expansion is a result of failures of the Division of

- Portfolio Planning (“DPP”). With the proposal, an expansion of CPE I conflicts with the siting of East Harlem Scholars.
- c. Having East Harlem Scholars in the building for the next two years would perhaps be okay with respect to CPE I’s expansion plans, but it does not really seem that East Harlem Scholars will be able to move into the proposed new building on time. If that is the case, where is DPP going to move that school after two years?
 - d. DPP said that schools would no longer be sited in buildings unless there is a definite permanent location for after the period of incubation.
 - e. What is the DOE’s exit plan? Does DPP have one? CPE I would have no problem welcoming East Harlem Scholars if there were an exit plan. It seems, by DPP’s own admission and track record, that there is no exit strategy.
5. For the following reasons, multiple commenters expressed support for the proposal:
- a. There are limited education options in the community, and there is difficulty in educating students in the community, and the proposed new school is needed now because of all of East Harlem Tutorial’s proven success, its well designed programs, and the high demand for the organization’s programs.
 - b. East Harlem Scholars will offer more needed extended day opportunities to East Harlem Scholars students.
 - c. East Harlem Scholars has already obtained land to develop a long term location, and the organization only needs time to develop the space.
 - d. East Harlem Tutorial is about teaching community members to be good citizens. There were parents, youth, volunteers, board members, alumni, staff and friends attending the hearing who, as Geoff Ginsberg stated earlier in the hearing, do not necessarily have children who will benefit from the proposed school, but were present in order to be civically engaged by interacting with the schools that already exist in M013.
 - e. The commenters either experienced or witnessed great success earned by students impacted by East Harlem Tutorial, and more students will benefit as a result of the proposal.
 - f. East Harlem Tutorial has been sharing the building with CPE I for years, and it is not a new situation. Since the proposal is temporary co-location, it will not be in the building forever.
 - g. The schools will be able to work together because they all have the same vision, which is a better education for all students.
 - h. Every school should have the blueprint of East Harlem Tutorial.
6. A commenter stated that, as a board member, she is confident in the organization’s ability to build the new building.
7. A commenter said learning is not about the building that the school is in.

8. A commenter said, as a parent of four kids attending CPE 1 and on the school's PTA, everyone knows that East Harlem Tutorial is a great program, but the problem is the space. The principals of the schools in M013 work together well to negotiate the space available in the building, but as it is, CPE I students have no use of the gym. The playground is only available because the grant was written by CPE I parents. Fortunately, the CPE I students spend a lot of time outside because they cannot use the gym, which is an example of how strained space is in the building. The DOE has not provided an exit strategy for East Harlem Scholars, but CPE I needs to expand to serve more grades.
9. A commenter said she hopes the DOE will be true to their word that the East Harlem Scholars building will be finished in two years, and CPE I will be able to have room to expand.
10. A commenter said the DOE needs to be more clear about how resources will be divided in the building. East Harlem Tutorial needs to be transparent about how their fundraising program works, and it needs to provide a clear picture of how long the building will take to be built, so CPE I will know if it will be able to expand after two years.
11. Multiple commenters asserted that the proposal pits schools against each other.
12. Multiple commenters stated that CPE I children do not have access to the gym because middle school and high school students use it for mandatory classes.
13. Multiple commenters asserted that CPE I is running a successful program that provides a valuable service to the community
14. A commenter said the DOE is telling the community that it does not care about the amount of space available to students.
15. A commenter said the proposal is simply part of the DOE's plan to privatize education, and East Harlem Tutorial is being used for this purpose at the expense of students in DOE schools
16. A commenter said the co-location will only work if the leaders involved in the proposal who were present at the hearing work together.
17. A commenter asserted that there are crazy logistics of sharing a building with two other schools, so four schools would be crazier.
18. A commenter said there is a disturbing pattern of DOE pushing out district schools and replacing them with charter schools. Though East Harlem Scholars say the time to open the school is now, the same is true about the expansion of CPE I, a progressive school. There are 17 charter schools in Harlem and East Harlem. There are two progressive elementary schools in the area and none that are K-8 programs.

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

For the following reasons, approximately 51 commenters expressed their opposition to the proposal:

19. Commenters asserted that CPE I should be allowed to expand to serve students through grade eight in the building because of the unique, progressive, project-based model offered by CPE I, and because many parents want their students to continue being served by the school after they graduate elementary school. The commenters asserted that the co-location of East Harlem Scholars would make this expansion impossible, and expressed the opinion that it is unclear why the DOE would favor a program competing with CPE I. Previously, the DOE denied CPE I's expansion proposal citing a lack of space in the building for an expansion.
20. Commenters asserted that there is already strain on shared spaces in the building, and this strain will be made worse by adding students to the building, a result of poor planning by the DOE. CPE I students already have no access to the gymnasium. Their access to outdoor spaces and the cafeteria will be similarly shortened. East Harlem Scholars students will be similarly handicapped by limited access to these shared spaces, negatively impacting all involved. Students are already eating lunch at 10:30 am, and some of the lower grade classes have to have lunch in their classrooms because of current constraints. These strains will result in less educational opportunity for students at schools currently in the building. The increasingly limited access to shared space will prevent elementary students from socializing with their peers outside the classroom.
21. Commenters asserted that CPE I parents wrote a grant to have the outdoor areas reconstructed, and that parents will be discouraged from working to secure grants for facility improvements, like the playground, if the DOE does not ensure the children of those parents receive unimpeded access to those facilities. The commenters further asserted that the DOE is allowing access by CPE I students to that playground space to be limited by this proposal.
22. Commenters expressed the opinion that it seems unlikely the building being built for East Harlem Scholars will be ready in time for occupancy, especially considering they have not yet broken ground, their fundraising levels are unclear, and they have no structures yet in place as evidence it is a formal school. Moreover, a commenter noted that DOE has said it will not propose the placement of new schools without being certain it first has a plan in place for that school. The DOE has also not provided any information on what will happen if the new building is not ready in time.
23. Commenters asserted that East Harlem Scholars should wait until their own building is built before opening. The commenters expressed the opinion that the district has enough elementary seats available to be able to handle such a delay. There is no rush to open the school especially considering the school does not have a principal lined up yet.

24. A commenter asserted that the mixture of middle school and high school students with elementary students already creates stress for CPE I families. The problems from this mixture include exposure to foul language and fights in the cafeteria.
25. A commenter noted that families had initially been told that East Harlem Scholars students would eat lunch in their classrooms, but this has now been changed to say they will share cafeteria space.
26. A commenter asserted that CPE I families are opposed to the proposal.
27. A commenter expressed the opinion that the proposal is not in the interest of students served in building M013.
28. A commenter expressed the opinion that the DOE is sabotaging one of its very few successful schools with this proposal, a place where parents actually want their children to attend, and asserted that the media will be interested in the issue.
29. A commenter expressed the opinion that in addition to negatively impacting the currently existing schools, the proposal dooms East Harlem Scholars to failure because of the limited space it will receive.
30. A commenter asserted resources should be put into the schools already operating in the building. Money and resources given to new charter schools should be used to support existing staffs. Programs at the existing schools should expand instead of starting an entirely different school. The commenter also expressed the opinion that opening a whole new school is a waste of resources. Whatever staff is needed to complete such an expansion should be hired to fund the expanded programs.
31. Commenters expressed the opinion that the proposal is a terrible idea, without specifying why.
32. Commenters expressed the opinion that the CPE I community can interpret the proposal only as a hostile attack on them by the DOE.
33. A commenter asked what the data is for how often school construction is completed within the estimated time schedule.
34. A commenter asserted that CPE I is a good school despite the faulty DOE grading system.
35. A commenter asserted that this proposal is racist, and these types of co-locations take place only in Black and Latino communities.
36. A commenter asserted that the DOE has pitted two quality educational organizations (CPE I and Harlem East Scholars) against each other with this proposal, making them fight each other for space.
37. A commenter asserted that the joint public hearing on March 22, 2011 at M013 was a stage-managed affair which did not provide enough information on what the DOE's plan is if the East Harlem Scholars building is not ready in two years.
38. A commenter asserted that it is already hard enough to have elementary students in such close quarters with much older students, and the compression caused by the proposal will only make this worse.

For the following reasons, approximately 16 commenters expressed their support for the proposal:

39. Commenters asserted that East Harlem Tutorial has been a part of the community for many years, and has demonstrated extraordinary success during that time.
40. Commenters asserted that East Harlem Tutorial was the community sponsor for the remodeled playground.
41. Commenters asserted that there is space in building M013.
42. Commenters asserted that East Harlem Tutorial works with many students currently enrolled in schools in M013 through after-school programs.
43. Commenters asserted that there is an urgent need for new elementary seats in the neighborhood.
44. A commenter expressed support for the proposal if the new building will be ready for East Harlem Scholars in two years.

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

Comments 2, 3, 5(a)-(h), 6, 7, 13, 36, 37, 38, 39, 40 are all in favor of the co-location and do not require a response.

Comments 4(b), 8, 9, 10, 18, and 19 all assert that CPE I should be allowed to expand to serve grades K-8, and this proposal will make that expansion impossible for at least two years.

CPE I withdrew its application for grade expansion for 2011-2012. In addition, District 4 already has excess middle school capacity, which would be a consideration in evaluating a grade expansion application. East Harlem Scholars, which would serve kindergarten through second grade students during the two years covered by this proposal, has considerable support within the District 4 community, and will provide a preference to District 4 students. CPE I has expressed its intent to propose grade expansion again in the future. Future expansion applications by CPE I would be evaluated based on their merits at the time they are made.

Comments 4(c), 4(e), 8, 9, 10, 22 and 23, all express doubt that East Harlem Scholars' new building will actually be completed in two years and ask what the exit strategy will be if the building is not completed.

East Harlem Scholars is working with the New York City Economic Development Corporation to develop property in District 4 and provide additional school seats for the District 4 community. The specific timing of any building completion is not certain two years' in advance of the projected completion date. However, the DOE supports providing additional options for District 4 elementary families, particularly given the performance level at many D4 zoned schools, and thus supports siting East Harlem Scholars in M013 beginning with next school year. If the East Harlem Scholars building is not ready by the projected date, the DOE would examine

all possible options for the school's location, and issue a new proposal and Educational Impact Statement for that siting. The Panel for Education Policy ("PEP") would have to approve any such additional proposal.

Comment 4(d) asserts that the DOE previously stated it would no longer incubate schools unless there was a definite site for the school during post-incubation years.

As discussed above, East Harlem Scholars is working with the New York City Economic Development Corporation to develop property in District 4 and provide additional school seats for the District 4 community. If the East Harlem Scholars building is not ready by the projected date, the DOE would need to issue a new Educational Impact Statement and get additional Panel for Education Policy ("PEP") approval before co-locating the school in any DOE building, including M013.

Comments 8, 12, 14, 20, and 25 all state that the co-location will put additional strain on the shared spaces in the building including the gymnasium and the lunch room. Commenters pointed out that CPE I already has no use of the gym and students eat lunch at 10:30 am and in their classrooms.

In terms of CPE I's use of the gymnasium, CPE I has a dance room and also goes on weekly ice skating excursions in the winter. These resources and choices address physical education needs for elementary students. With only 9 class sections at CPE I, and only 6 sections proposed for East Harlem Scholars, there is ample time during the week for all students to have time in the playground.

The cafeteria has capacity for 375 students. CPE I and East Harlem Scholars have a combined maximum enrollment of 365 students, and thus should be able to share the cafeteria and eat at the same time. This would result in CPE I having the same amount of time in the cafeteria as it does today. In addition, the Building Council will have the opportunity to work together to create a shared space schedule that reflects the needs of all schools in the building.

Comments 11, 17, and 36 assert that this proposal pits schools against each other and that four schools sharing a building is unworkable.

Given the finite number of buildings available in New York City, the DOE attempts to use all of its school buildings as efficiently as possible. Co-location is therefore very common in New York City schools, as there are not sufficient school buildings to allow each school organization to operate its own building. A co-location means that two or more school organizations are located in the same building. While they share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students' use. This proposal is not intended to pit the schools in the M013 building against each other. Indeed, East Harlem Tutorial has been successfully working in M013 for many years.

Comment 15 asserts that this proposal is part of the DOE's plans to privatize education.

Charter schools are public schools like DOE schools. The DOE uses the same space guidelines for charter schools and DOE schools, and makes every effort to apply its guidelines equally to all schools.

Comments 18 and 30 assert that the DOE favors charter schools over district schools.

As discussed above, the DOE uses the same space guidelines for charter schools and DOE schools, and makes every effort to apply its guidelines equally to all schools.

Comment 18 asserts that there are 17 charter schools in Harlem and East Harlem, but only two progressive elementary schools in the area and none that are K-8 programs, and asserts that CPE I should expand as a result.

CPE I's decision to withdraw its application to expand to serve grades K-8 was noted above. The DOE supports parent choice and strives to provide District 4 parents with high quality options for their children. There are currently only 5 charter schools located in District 4 that serve elementary school grades. The District 4 community has demonstrated support for East Harlem Tutorial, and the DOE believes that siting East Harlem Scholars in M013 will provide another high-quality, high-demand option for District 4 families.

Comment 20 asserts that elementary school students are no longer able to socialize outside the classroom because there is not sufficient space.

The proposed Shared Space Plan contained in the BUP schedules CPE I and East Harlem Scholars students time in the playground and cafeteria each day.

Comment 21 asserts that CPE I parents applied for a grant to have the playground redone and will not apply for grants in the future if their children cannot benefit from the results.

Given the small size of CPE I – 9 class sections -- it is unlikely that CPE I students are currently using the playground during all periods of the school day. There is no reason these physical plant resources should not be made available to other public school students when not in use by CPE I. Again, the Building Council will have the opportunity to work together to create a shared space schedule that reflects the needs of all schools in the building. In addition, the community partner that supported the creation of the playground was East Harlem Tutorial Program, the same organization that is creating East Harlem Scholars Charter School.

Comment 23 asserts that East Harlem Scholars should not open until its building is complete because there is no rush to open a new elementary school.

While there are enough elementary seats in D4, the performance level of schools in the District is a concern. Of the 19 D4 schools serving elementary grades and receiving progress reports, 14 schools have fewer than 50% of students testing at or above grade level on the ELA and 9 schools have fewer than 50% of students testing at or above grade level in math.

While East Harlem Scholars has not yet announced the name of the Principal, the school has been developed by the staff and leadership of EHTP, which has 53 years of educational experience in District 4.

Comments 24 and 38 state that co-locating elementary school students with middle and high school students leads to problems and this co-location will add to the problems by making the building more crowded.

Adding additional elementary grade students to M013 would have no impact on the exposure to high school and middle school age students for CPE I families. As for the asserted problems with elementary school students, middle school students, and high school students being served in the same building, CPE I and East Harlem Scholars families may choose to attend these schools with the knowledge that their children will be in a building with middle and high school students. Multiple DOE campuses operate with students across grades K-12.

Comment 25 states that the proposal originally contemplated East Harlem Scholars students would not use the cafeteria at all.

The proposal never contemplated that East Harlem Scholars would eat lunch in their classrooms, and does not currently contemplate that they would eat lunch in their classrooms. The DOE hopes that this clears up any misunderstanding or miscommunication to the contrary.

Comment 26 states that CPE I families are opposed to the proposal.

The DOE understands that some CPE I families are opposed to the proposal. However, the DOE continues to believe that the needs of all families in District 4 are best served by providing additional high-quality options. As discussed in the EIS, the DOE believes that East Harlem Scholars will provide such an option, and further believes that CPE I's programming will not be negatively affected by the proposal.

Comment 27 states that the proposal is not in the interests of students currently attending school in the M013 building.

The DOE must take into consideration not only the needs of students already in the building, but the needs of students throughout the District. The M013 building is under-utilized. The limited resources of the Capital Plan require that the DOE use all available space to serve students.

Comments 28 and 32 assert that this proposal is an attack on CPE I.

The proposal does not take space away from CPE I. In fact, the proposal anticipates that CPE I will gain space in future years as measured against its current allocation. The DOE intends to support CPE I in its educational mission, and does not intend for this proposal to be interpreted in any way as an attack on the school.

Comment 29 asserts that East Harlem Scholars will fail because of the limited space it is being allocated.

Many new schools open successfully with a limited amount of space. The proposal provides East Harlem Scholars with the baseline footprint allocation it requires for the grades and number of students served.

Comment 30 asserts that instead of opening a new school, the DOE should expand the schools in the building.

Schools are funded based on their student enrollment. To the extent student enrollment increases, schools will receive additional funds. Central Park East High School has indicated it does not wish to expand beyond the size in this proposal. J13 enrollment projections are consistent with the overall capacity and demand for middle school seats in District 4.

Comment 33 asks for statistics on how often school construction is completed on time.

As noted above, East Harlem Scholars is building its new facility in conjunction with the New York City Economic Development Corporation, not the DOE or the School Construction Authority. As a result, the DOE does not have data responsive to this request. However, per the EIS, the DOE will evaluate potential space in District 4 for the 2013-2014 school year should East Harlem Scholars still require incubation space. Any co-location for that year or beyond would require a new EIS.

Comment 34 asserts that CPE I is a good school and the DOE has a faulty grading system.

The proposal to site East Harlem Scholars in M013 is based on the availability of space in the building, not on the performance of CPE I.

Comment 35 asserts that proposals similar to this one target African-American or Latino communities.

The DOE strives to provide strong educational opportunities for students of all races and backgrounds. The DOE has proposed to site East Harlem Scholars in M013 because of the demand for additional high quality elementary seats in District 4, and because of the excess space available in the M013 building.

Comment 37 asserts that the Joint Public Hearing held on March 22, 2011 was stage managed and not enough information was shared regarding what would happen if East Harlem Scholars' building was not completed on time.

The Joint Public Hearing process follows requirements set out in Chancellor's Regulation A-190. Joint Public Hearings are not question and answer sessions. All comments are incorporated and addressed in this analysis of public comment. Information regarding an "exit strategy" if East Harlem Scholars' building is not completed in two years is discussed above.

Changes Made to the Proposal

No changes have been made to this proposal.