

Public Comment Analysis

Date: March 24, 2015

Topic: The Proposed Re-Siting and Co-Location of Beginning with Children Charter School (84K703) Grades K-5 with P.S./I.S. 157 The Benjamin Franklin Health & Science Academy (14K157) in Building K157 Beginning in the 2015-2016 School Year

Date of Panel Vote: March 25, 2015

Summary of Proposal

On February 6, 2015, the New York City Department of Education (“DOE”) issued an Educational Impact Statement (“EIS”) describing a proposal to re-site and co-locate grades kindergarten through five of Beginning with Children Charter School (84K703, “BwCCS”) in building K157 (“K157”) with P.S./I.S. 157 The Benjamin Franklin Health & Science Academy (14K157, “P.S./I.S. 157”), a district school that serves students in grades kindergarten through eight and offers a full-day pre-kindergarten program, beginning in the 2015-2016 school year. K157 is located at 850 Kent Avenue, Brooklyn, New York 11205, in Community School District 14 (“District 14”). Currently BwCCS’s kindergarten through fifth grades are housed in private space (building K837, “K837”), located at 11 Bartlett Street, Brooklyn, New York 11206. Its sixth through eighth grades are housed in building K148 (“K148”), located at 185 Ellery Street, Brooklyn, New York 11206, where it is co-located with a District 75 program, 75K373@K148, which serves students in grades nine through twelve. All three buildings are within the geographical confines of District 14. A “co-location” means that two or more school organizations are located in the same building and may share common spaces such as auditoriums, gymnasiums, libraries, and cafeterias.

If this proposal is approved, beginning in the 2015-2016 school year, BwCCS students in grades kindergarten through five will no longer attend classes at K837 and instead will attend classes at K157. K157 is located approximately 0.9 miles from BwCCS’s current private space, where its elementary school grades are housed. BwCCS has advised that it will not be able to operate in its private space after the 2014-2015 school year. The re-siting of BwCCS’s grades kindergarten through five from its private space to K157 is intended to support the educational continuity of students enrolled in BwCCS. If approved, the re-siting will provide the opportunity for current and future BwCCS students in kindergarten through fifth grade to remain enrolled at the school at K157.

Building K157 also contains an adult education program (“79K755@K157”) administered by the Office of Adult and Continuing Education (“OACE”) for adults age 21 and over. OACE programs offer over 900 classes in Adult Basic Education, High School Equivalency, English for Speakers of Other Languages, and Career and Technical Education. OACE has requested that 79K755@K157 be re-sited from K157 to another location in Brooklyn in order to meet the demand for classes in other areas of the borough. As a result, beginning in the 2015-2016 school year, 79K755@K157 will be re-sited to another location in Brooklyn.

According to the 2013-2014 Enrollment, Capacity, Utilization Report (“Blue Book”), K157 has a target capacity to serve 841 students. During regular school hours, the building serves approximately 542 students from P.S./I.S. 157 and 90 students from 79K755@K157 in the 2014-2015 school year, yielding an estimated building utilization rate of 75%. This means that the building is “under-utilized” and has space to accommodate additional students. If this proposal is approved, in 2015-2016, BwCCS will serve approximately 275-305 kindergarten through fifth grade students and P.S./I.S. 157 will serve approximately 481-571 students in grades kindergarten through eight and pre-kindergarten. At this point, K157 will no longer house 79K755@K157. K157 will have a projected utilization rate of 90%-104% in 2015-2016 and will have sufficient space to accommodate BwCCS and P.S./I.S. 157.

The details of this proposal have been released in an EIS and Building Utilization Plan (“BUP”), which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2014-2015/March2015SchoolProposals>

Copies of the EIS and BUP are also available in the main offices of P.S./I.S. 157 and BwCCS.

Summary of Comments Received

Extensive public engagement was conducted by the DOE in the course of creating this proposal which included:

- Conducting a walkthrough of building K157 with a member of DOE Senior leadership, Deputy Chancellor Phil Weinberg, on January 28, 2015, and holding a meeting before the walkthrough with the P.S./I.S. 157 principal and School Leadership Team (“SLT”) members to discuss the proposal further, take questions and concerns from the P.S./I.S. 157 school community, and determine whether significant logistical or other concerns would prevent the implementation of this proposal if it is approved by the Panel for Educational Policy (“PEP”).
- Attending the District 14 Community Education Council (“CEC 14”) meeting on February 12, 2015, at which members of CEC 14 had the opportunity to ask questions and provide feedback about the proposal, and at which over 100 members of the District 14 community were present and had the opportunity to ask questions and voice feedback about the proposal to representatives from the DOE.

The DOE also held a joint public hearing regarding this proposal at the K157 building on March 10, 2015. At that meeting, interested parties had an opportunity to provide input on the proposal. Approximately 540 members of the public attended the hearing. There were seventy-eight (78) speakers. Individuals present at the meeting included: District 14 Community Superintendent and Chancellor’s Designee, Alicja Winnicki; New York City Councilman Stephen Levin; Evelyn Cruz, a representative for Congresswoman Nydia M. Velazquez; CEC 14 1st Vice President, Debbie Feiner, CEC 14 Treasurer, Epifanio Canongo, and CEC 14 members Ramon Peguero, Elaine Manatu, and Madeline Rivera; P.S./I.S. 157 Interim Acting Principal Juliana Notaro; BwCCS Principal Les King; P.S./I.S. 157 SLT Chair Anthony Mercatante; and Vicki De Javier, Jyoti Folch, Estelle Acquah, Greg Whitten, and DawnLynne Kacer from the DOE.

The following comments and remarks were made at the joint public hearing on March 10, 2015:

1. Debbie Feiner, CEC 14 1st Vice President, said that she has heard great things about BwCCS and that she anticipates learning more about the school and the impacts of the proposal throughout the course of the hearing. She emphasized that the CEC stands with the P.S./I.S. 157 community.
2. Juliana Notaro, P.S./I.S. 157 Interim Acting Principal, stated that she is against the proposal and that she has heard some concerns about the proposal from her school community, including:
 - a. Negative effects on education, such as increased class sizes, testing services, limited space for special education related services, meeting special education service mandates, and mid-day transitions throughout the building;
 - b. Negative effects on school culture and celebrations;
 - c. Negative effects on ability to continue planning afterschool programs;
 - d. Negative effects on busing routes and traffic on surrounding streets; and
 - e. A history of unsuccessful co-locations between P.S./I.S. 157 and other charter schools in K157 in the past.
3. Councilmember Stephen Levin stated that both schools should be able to expand to their fullest potential, that P.S./I.S. 157 has made remarkable progress over the years, and that the community voice must be heard in order for any proposal to be successful.
4. Anthony Mercatante, P.S./I.S. 157 SLT Chairman, stated concerns that the proposal will result in a lack of space and overcrowded classes and will deprive the P.S./I.S. 157 community of vital resources and rooms.
5. Elaine Manatu, CEC 14 member, stated that District 14 has received many co-locations, and that she disagrees with the proposal.
6. Epifanio Canongo, CEC 14 Treasurer, stated that he is against the proposal.
7. Ramon Peguero, CEC 14 member, stated that he is against the proposal:

- a. He stated that both schools deserve the chance to grow in their own separate space.
 - b. He also stated that the DOE is only co-locating in communities of color and low socioeconomic standing; adding that there are no co-locations in the schools of rich communities.
8. Evelyn Cruz, representative for Congresswoman Nydia Velazquez, stated the following:
 - a. She supports both schools, and is not at the meeting to attack BwCCS; instead, she is at the meeting to emphasize her support for P.S./I.S. 157.
 - b. She is upset that the government is creating division amongst its own communities.
 - c. She stated that both schools deserve their own space to grow and should be placed in their own building.
 - d. She also stated that P.S./I.S. 157 had a waiting list of over 200 students, so their school site should not be chosen for this co-location.
9. Valerie Davis-Fells, Principal of BwCCS's middle school, stated that BwCCS is being displaced and is saddened to find itself in the position they are in.
 - a. She emphasized that BwCCS has a history of sharing resources with other schools in which they are co-located, and that they look forward to having a focus on collaboration if co-located with P.S./I.S. 157.
10. Les King, Principal of BwCCS's lower school campus, stated that BwCCS is a part of the District 14 community and that all children need to be treated equally.
 - a. He further emphasized that BwCCS is a small school with a history of building partnerships and working together.
11. A teacher and SLT member from P.S./I.S. 157 stated that she is disappointed with the prospect of having a charter school co-located in the building, and that she interprets this proposal as a roadblock that the DOE is placing in the way of P.S./I.S. 157's long-term growth.
 - a. She further emphasized that this is a tradeoff between effective education and bottom-line financial resources, with the city emphasizing fiscal saving over educational efficacy.
12. A teacher and SLT member from P.S./I.S. 157 stated that she is against the co-location, and that the school will be filled beyond capacity if the proposal passes, without the ability to further grow.
13. A student from P.S./I.S. 157 stated that if the proposal passes he fears that he will no longer have a good education.
14. A student from P.S./I.S. 157 stated that she is opposed to the co-location as she fears that it will hurt her ability to receive proper special education services.
15. A student from P.S./I.S. 157 stated that he is against the co-location because he fears that it will hurt his learning and his ability to receive special education services.
16. A student from P.S./I.S. 157 stated that he is against the co-location because he fears that it will take away important rooms such as a computer lab, library, art room, or science lab.
17. A student from P.S./I.S. 157 stated that she is against the proposal because:
 - a. She fears for school safety if the proposal passes, and asked if there will be extra safety officers.
 - b. There are many students that require special education and English Language Learner ("ELL") services, and these programs need the extra space.
 - c. Class sizes will increase.
 - d. Co-location will prevent the school from further growing
18. A student from P.S./I.S. 157 opposed the proposal because it will force the school to share the library.
19. A student from P.S./I.S. 157 opposed the proposal because he fears that it will cause overcrowding in the classrooms.
20. A former student from P.S./I.S. 157 opposed the proposal because she feared that it will lead to overcrowding, which will hurt the opportunity for current students to succeed.
21. A student from P.S./I.S. 157 opposed the proposal because he feared that it would cause overcrowding in the school.
22. A student from P.S./I.S. 157 opposed the proposal because she feared that it would cause after school activities to be cancelled.
23. A member of the District 14 community opposed the proposal because he feared that co-location will lead to unequal sharing of resources, which can lead to students feeling demoralized.
 - a. He also feared that issues caused by the co-location will force principals to focus too much of their time managing building related issues, rather than focusing on education programming.
24. A teacher from P.S./I.S. 157 stated that he is against the proposal because:
 - a. It will cause the school to be overcrowded;

- b. It will force teachers to give up their classrooms; and
 - c. It will hurt the school's ability to grow and expand.
25. A teacher from P.S./I.S. 157 stated that she is against the proposal because it negatively impacts ELL students in the school.
 26. A teacher from P.S./I.S. 157 stated that she is against the proposal because it will deprive the school of needed space to welcome its own community students.
 27. A student from P.S./I.S. 157 stated that he is against the proposal.
 28. A student from P.S./I.S. 157 stated that teachers at the school need a chance to grow, which cannot happen if this proposal passes.
 29. A student from P.S./I.S. 157 stated that the co-location is a bad idea, as this will reduce the school's chance to succeed.
 30. A student from P.S./I.S. 157 stated concerns that the proposal will take away space from ELL services.
 31. A student from P.S./I.S. 157 stated concerns that the proposal will negatively impact the quality of instruction in the building.
 32. A student from P.S./I.S. 157 stated that the co-location can cause safety concerns in the building if the building becomes overcrowded.
 33. A student from BwCCS stated that he is in support of the proposal, as the school needs the space currently available in K157.
 34. A student from BwCCS stated that he hopes both schools can work together, and that he supports the proposal.
 35. A student from BwCCS stated that he has been at his school since Pre-K, and he supports the proposal. He further asked P.S./I.S. 157 to be willing to share its space.
 36. A student from BwCCS stated that the proposal should pass because his school needs the space. He asked if the middle school can share space with another building, why can't the elementary school?
 37. An alumnus of BwCCS stated that he attended his school from K-8 and had lots of great experiences, such as visiting Washington D.C., playing music in school, and visiting colleges with the school. He is now in college and supports this proposal because the school needs to continue to exist to continue to provide the opportunities he had to other children.
 38. A teacher at and alumnus of BwCCS stated that he supports the proposal. He added that every child deserves an education, that the school is already a part of the District 14 community, and that all participants at the hearing should view themselves as friends, not strangers. He believes in solutions to the fears expressed by others in the hearing.
 39. A parent coordinator at P.S./I.S. 157 stated that she is against the co-location because the school wants to further grow, and this will hurt its chance to grow.
 40. A teacher at P.S./I.S. 157 stated that she is against the proposal because:
 - a. This will lead to larger class sizes, which will negatively impact the quality of instruction at P.S./I.S. 157.
 - b. This will force the school to be out of compliance with requirements of special education law.
 41. A parent of a former student at P.S./I.S. 157 stated that:
 - a. Classrooms in the school are already overcrowded.
 - b. BwCCS needs its own space, not the space at K157.
 42. A member of the District 14 community expressed that the co-location will lead to overcrowding and will negatively impact student learning.
 - a. This speaker further asked what will happen if both schools end up competing for the same students.
 43. A teacher at P.S./I.S. 157 stated that she is against the co-location because it will divide the community, which is bad for students.
 44. A speaker stated that he is against the co-location because both schools deserve their own location.
 - a. This speaker further stated that he feels this proposal demonstrates segregation.
 45. A teacher at P.S./I.S. 157 stated that she does not want opportunities taken away from students in her school.
 46. A parent representative from BwCCS stated that the school is being displaced, has been a part of the community since 1993, and is asking for space as members of the community.
 - a. He added that both schools serve children of similar backgrounds, that his school welcomes all children, and that the schools should work together.
 47. A staff member from BwCCS stated that politics should be kept aside, and that the proposal should pass to benefit the students in need of a new location.
 48. An assistant principal at BwCCS stated that he believes partnership is possible, that both schools share similar values, and that BwCCS would not be present if they truly did not believe that this proposal would work well

for both schools. He added that he supports the proposal.

49. A board member of BwCCS stated that the school is a community-run charter school, and a community organized charter school. He added that BwCCS is not the type of charter school that aims to exclude anybody, take extra space, or displace others. The school welcomes all students, and they look forward to working as a community together with P.S./I.S. 157.
50. A teacher from BwCCS stated that school teachers are proud members of the UFT, and that the school would not exist without the UFT. She added that they are a community based school focused on equity and on equipping teachers and students with the tools they need to be successful.
51. A parent of BwCCS alumni stated that she has two (2) children and two (2) grandchildren that have graduated from BwCCS, and that she supports the school and the co-location.
52. A parent of a student at BwCCS stated that all children deserve a place to learn.
53. A parent of a student at BwCCS stated that BwCCS helped her child as an immigrant in this country. Her son has grown and learned a lot as a result of the school.
54. A participant read a statement from the principal of the District 75 program with which the BwCCS middle school is co-located, reading:
 - a. The co-location at K157 can work, as BwCCS has made the co-location work well with its middle school.
 - b. The middle school frequently meets with other programs in its building to resolve issues around shared space, safety, and other resources, and she is confident that the school leaders in K157 can do the same.
 - c. She added that BwCCS has an amicable relationship with its co-located schools in middle school.
55. A parent and alumnus of BwCCS stated that the school is in a tough place without a home, and is simply asking for some space to continue to exist in K157.
56. A parent and staff member at BwCCS stated that the school is a part of the community, and accepts all children regardless of their background. She added that this problem is not anybody's fault, but that they are asking for a solution and supports the co-location.
57. A member of the BwCCS community stated that he appreciates the passion of the P.S./I.S. 157 community, and that parents from BwCCS want the same type of success for their children that parents from P.S./I.S. 157 are saying about their own children. He says that he feels the school has been bullied, and he requests the opportunity for his children to be able to continue attending school at BwCCS in the fall, which this proposal will allow.
58. A parent of students at BwCCS said that her family lives in this community, and she hopes that the proposal passes so that her children can continue to have the space they need to attend school.
59. A member of the BwCCS community said that she is asking for support and help from P.S./I.S. 157 as members of the same community district. She said that BwCCS is a community led and managed school, and that they are simply asking for help as they are currently being evicted.
 - a. She added that she feels the DOE is pitting both communities against one another.
60. A speaker commented that a school he works in shares space with a Success Academy, and they have lost many rooms as a result of the co-location. He is against the co-location because it creates a situation of "haves" and "have-nots."
61. A speaker commented that he is a retired teacher and a husband of a Pre-K teacher in P.S./I.S. 157. He stated that both schools deserve their own space.
 - a. He further added that the enemy here is neither school, but the DOE. He stated that parents should not have to fight for space, and it is a shame that the DOE is pitting parents against each other. He stated that the DOE is racist and corrupt.
62. The PTA president from P.S./I.S. 157 stated that their children need the current space in order to have an excellent education. She feared that the co-location would lead to a loss of space and overcrowded classrooms.
63. A teacher from P.S./I.S. 157 stated that a lawsuit in California resulted in the state supreme court declaring that overcrowding in public schools negatively impacts student learning. She then stated that the attorney representing BwCCS was the same attorney that helped win the lawsuit in California.
 - a. She further stated that she is against the proposal.
64. A speaker commented that the co-location will make it impossible to accommodate all student needs in the school.
 - a. The speaker also commented that this co-location will hurt P.S./I.S. 157 from further growing.
65. A speaker commented that they are against the proposal because it will increase transit in the area.
66. A PTA and SLT member from P.S./I.S. 157 stated that the proposal will hurt the growth of her school and cause

over-crowding in the school.

67. A speaker commented that is against the proposal because of fears that it will make the school unsafe due to overcrowding, and that the proposal will take away after school programs.
68. A speaker commented that he has a child at P.S./I.S. 157, and he fears that if the proposal passes then his other children will not be able to attend P.S./I.S. 157 due to a lack of space.
69. A speaker commented that she has a child in P.S./I.S. 157 who receives special education services, and she fears that this proposal will cause her child to no longer receive the required services.
70. A parent from the P.S./I.S. 157 community stated that she is opposed to the co-location because it will reduce time in the cafeteria for students.
71. A parent from the P.S./I.S. 157 community stated that she is opposed to the co-location.
72. A parent from the P.S./I.S. 157 community stated that she fears that the co-location will not work in this building, and that she fears this will be bad for students.
73. A parent from the P.S./I.S. 157 community stated that it is a shame that DOE would put forth this proposal that is dividing the community. He expressed that resources are being placed before children needs.
74. A representative from BwCCS said that her school is a community based charter, and that the DOE's research has already determined that this proposal can work. She expressed that P.S./I.S. 157 cannot get better partners than BwCCS, which focuses on collaboration and community-based involvement.
75. A programming director for an after school program at P.S./I.S. 157 stated that she fears after school programs will be taken away if the co-location is approved.
76. A speaker from the P.S./I.S. 157 community expressed that he is against the proposal because there is not enough space in the building for both schools.
77. A parent from the P.S./I.S. 157 community expressed that her child receives special education services at P.S./I.S. 157, and that she fears that her child's services will be taken away if this proposal is approved.
78. A parent from the P.S./I.S. 157 community expressed that she opposes the proposal because:
 - a. K157 does not have space for both schools.
 - b. Language and special education services will be reduced or taken away if this proposal is approved.

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

The DOE received 130 emails through the dedicated email address for this proposal.

The following comments were submitted through the dedicated email address.

79. Multiple comments received did not relate to the content of this proposal.
80. Multiple comments received expressed concern that this proposal would result in insufficient space at K157 for either program.
81. Multiple comments received expressed general opposition to this proposal.
82. Multiple comments received expressed concern that this proposal would hurt education programming options at K157, such as ELL programming or special education programming.
83. Multiple comments received expressed concern that this proposal would hurt after school programming at K157.
84. Multiple comments expressed concern that this proposal would frustrate potential growth in P.S./I.S. 157.
85. Multiple comments expressed concern that this proposal would lead to overcrowding in the classes at P.S./I.S. 157.
86. Multiple comments received expressed support for this proposal.
87. Multiple comments received questioned why K157 was selected for this co-location instead of other buildings in District 14.

The DOE received 25 voicemails through the dedicated phone number for this proposal.

The following comments were submitted through the dedicated phone number.

88. Multiple calls received expressed general opposition to the proposal.
89. Multiple calls received expressed concern about insufficient space at K157 for this proposal.

90. Multiple calls expressed support for this proposal.
91. Multiple calls received expressed concern that this proposal will lead to overcrowding at K157.
92. Multiple calls received expressed concern that this proposal will prevent either school from continuing to grow.
93. Multiple calls received expressed concern that this proposal will lead to a loss of programming at P.S./I.S. 157 for either ELL or special education students.

The following comment was submitted directly to members of the PEP for consideration and was also submitted to the DOE for response.

94. Peter Kern and Amanda Haught, members of the Beginning with Children Charter School Board of Trustees, submitted comments to the DOE on behalf of the BwCCS Board of Trustees. The written comments raised the following points:
 - a. BwCCS is being forced out of its current space at 11 Bartlett Street and needs to receive co-located space, or else the school will be forced to close its doors after 22 years in operation.
 - b. BwCCS is concerned about K157 as a potential co-location site following the JPH on March 10, 2015, where significant opposition was voiced against the idea of the co-location.
 - c. The BWCCS board has learned that P.S. 297, located at 700 Park Avenue is closing and they feel that this building is more ideal than K157. They believe that the DOE and PEP have the power to act under special proceeding given this situation.

Analysis of Issues Raised, Significant Alternatives, Significant Alternatives Proposed

Comments 9, 10, 33-38, 46-59, 74, 86 and 90 are in favor of the proposal and do not require a response.

Comments 1, 3, and 8(a) are neither in direct support nor opposition to the proposal, and thus, do not require a response.

Comments 2, 5, 6, 11, 13, 27-29, 31, 45, 63(a), 64, 71, 72, 81, and 88 express general opposition to the proposal.

The DOE respects that there may be a difference of opinions in regards to this proposal; however, since BwCCS cannot continue to operate in its private space beyond the 2014-2015 school year, the DOE believes that the co-location of BwCCS at K157 will support the educational continuity of students currently enrolled at BwCCS. Moreover, there is sufficient space in K157 to support this co-location.

Although the DOE recognizes that some people in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at P.S./I.S. 157 and BwCCS will be able to create productive and collaborative partnerships.

Comments 2(a), 4, 12, 17(c), 19, 20, 21, 24(a), 40(a), 42, 66, 78(a), 85, and 91 express concerns that the proposal will increase class sizes in P.S./I.S. 157 and create overcrowding. Further, comments 17(d), 24(c), 39, 64(a), 66, 84, and 92 suggest that this proposal will hurt school growth at P.S./I.S. 157. In addition, comment 68 expressed fears that this proposal will prevent his child from enrolling at P.S./I.S. 157. Last, comments 8(d) and 41(a) suggest that classes are already overcrowded at P.S./I.S. 157 and that P.S./I.S. 157 has had a waiting list in recent years.

As stated in the EIS, the proposal is not expected to impact enrollment at either P.S./I.S. 157 or BwCCS. Additionally, should either school's enrollment increase, both schools continue to have sufficient space in their current sections to accommodate further students.

With regards to the particular concerns raised about potential impact on programming at P.S./I.S. 157, the proposal does not decrease the current section counts offered by the school, nor do historical enrollment trends indicate that P.S./I.S. 157 will grow significantly in the immediate years to come. For instance, despite recent grade expansions from a K-5 to a K-8 school, P.S./I.S. 157's enrollment decreased between 2013-2014 and 2014-2015.

With regards to the comments that P.S./I.S. 157 has had a waitlist in recent years or that P.S./I.S. 157 is currently overcrowded, the DOE notes that the average class size in P.S./I.S. 157 is currently 22 students, which is smaller

than the District 14 average K-8 class size of 25. Further, P.S./I.S. 157 has had no waitlist in recent years; for example, P.S./I.S. 157 has not had enough demand to fill either its kindergarten or 6th grade seat target in the past two years.

Comments 2(a), 4, 16, 18, 23, 24(b), 26, 62, 70, 76, 80, and 89 express concern that this proposal will result in insufficient resources and space, including shared space, for both schools.

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

K157 contains a cafeteria, two multi-purpose rooms, an auditorium, and a library, use of which have been proposed in time distributed equitably per each school’s projected enrollment for the 2015-2016 school year in the BUP. The DOE is confident that these shared spaces can adequately accommodate the needs of the two schools. If this proposal is approved by the PEP, the Building Council is encouraged and empowered to determine a shared space schedule that minimizes disruption to students and provides sufficient time for all students to be served. If the Building Council is unable to agree upon a schedule for shared spaces, the Building Council should utilize the dispute resolution process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

Further, as noted, allocation of classroom, resource, and administrative space is guided by the Footprint which is applied to all schools in the building. Though this proposal will decrease the current rooms available for use by P.S./I.S. 157, the proposal has assigned each school’s room allocation in accordance with the requirements mandated by the Footprint.

Comments 17(a), 32, and 67 express concerns that K157 will be unsafe if this co-location occurs due to a potential lack of safety agents and fire hazards from having too many students in the building.

School Safety Agents (“SSAs”) are assigned to schools based on each building’s projected enrollment. The NYPD’s School Safety Division looks at a set of variables to determine the number of SSAs to deploy to a particular school building, including the crime rate, size and design of the building, enrollment, and grade span.

Further, due to space limitations across the city, it is not unusual for multiple schools to be co-located in a building together. Pursuant to Chancellor’s Regulation A-414, every school or campus is mandated to form a School Safety Committee. This committee 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, including a fire safety plan, which entails fire drill and evacuation procedures. School leaders from P.S./I.S. 157 and BwCCS will form a School Safety Committee at K157. The School Safety Plan is updated annually by the Committee to meet the changing needs, changes in organization and building conditions and any other factors; these updates can also be made at any other time it is necessary to address security concerns. The Committee will also address safety matters on an ongoing basis and make appropriate recommendations to the principals when it identifies the need for additional security measures.

In addition, as stated in the EIS, the DOE makes available the following supports to schools relating to safety and security:

- Providing “Best Practices Standards for Creating and Sustaining a Safe and Supportive School,” as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

Comments 2(c), 22, 67, 75, and 83 concern the potential impact of this proposal on P.S./I.S. 157’s afterschool programming.

As stated in the EIS, the DOE does not anticipate that this proposal will impact the current extra-curricular activities or partnerships at P.S./I.S. 157. P.S./I.S. 157 will continue to offer extra-curricular programs based on student interests, available resources, and staff support for those programs. Its extra-curricular activities and partnerships will continue to be available to all P.S./I.S. 157 students

However, the re-siting and co-location of BwCCS at K157 may change the way programs offered in K157 are configured. For example, some activities may now be offered at K157 that may need to share classroom space, or the scheduling of those activities may change as a result of the co-location at K157. Students will continue to have the opportunity to participate in a variety of extra-curricular programs though the specific programs offered at a given school are always subject to change. That is true for any City student as all schools modify extra-curricular offerings annually based on student demand and available resources.

Comments 2(d) and 65 assert that this co-location will lead to increased traffic in the areas surrounding K157.

If this proposal is approved, the Office of Pupil Transportation (“OPT”) will work with the school organizations to identify the most appropriate plan for drop-off and pick-up. Final student busing routes will be determined based on the home addresses of students at the school organizations.

To assist with student pedestrian traffic around schools, school crossing guards are allocated by local police precincts. School administrators can contact their local precincts to request additional crossing guards.

That said, based on experience with similar co-locations in other buildings, the DOE does not anticipate issues arising as a result of increased traffic, should this proposal be approved by the PEP.

Comment 2(e) expresses opposition to this proposal because P.S./I.S. 157 claims to have had unsuccessful co-location relationships in the past.

Although the DOE recognizes that people in the community may have strong feelings against this proposal, the DOE believes that, if this proposal is approved, the school communities at P.S./I.S. 157 and BwCCS will be able to create productive and collaborative partnerships. Further, given the comments of the BwCCS community and the comments read on behalf of the principal of the District 75 program with which the BwCCS middle school is co-located, the DOE believes that BwCCS has a history of working to make co-locations a collaborative and successful partnership, and that BwCCS intends to work hard to make this proposed co-location collaborative, successful, and amicable amongst all schools and programs in K157.

Comment 43 asserts that by implementing this proposal the DOE is dividing the community.

Co-location is very common in New York City schools, with 44% of all DOE buildings housing more than one school organization. This includes co-location of district schools with charter schools and co-locations of district schools with other district schools. While schools share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students’ use. Though disagreement may exist as to whether a particular proposal is the best way to resolve community education needs, the DOE has found that after a proposal passes most school communities are able to successfully come together with amicable relationships and collaborative agreements.

Comments 2(a), 14, 15, 17(b), 25, 30, 40(b), 69, 77, 78(b), 82, and 93 assert that this proposal will result in a loss of special education and related services and of language-based services at P.S./I.S. 157.

This proposal does not reduce or eliminate the self-contained or language-based programming offered at P.S./I.S. 157, and the proposal continues to provide the space necessary to provide these services per the regulations of the Footprint. Consequently, the DOE does not anticipate that this proposal will result in a loss of any mandated services.

Comment 2(b) suggests that this proposal will hurt school culture at P.S./I.S. 157.

As school culture and events are directed by administrative programming decisions in each school, the DOE does not expect that this proposal will impact the school culture at P.S./I.S. 157.

Comment 42(a) inquires as to the effects of this proposal on enrollment competition between the two schools.

As previously noted and as stated in the EIS, this proposal is not expected to impact current or future enrollment in either school involved in this proposal. Both schools will continue to use the same admissions criteria they each currently use.

Further, it is not unusual for schools serving the same grade levels to be co-located together. In fact, the DOE has viewed that schools with co-locations that serve the same grades have increased opportunities for collaboration and sharing of best practices. Thus, co-locations where schools serve the same grade can have positive effects on pedagogy, professional development, and student achievement.

Comments 7(a), 8(c), 41(b), 44, and 61 assert that both schools should have their own space.

As previously noted, 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 – with 44% of all DOE buildings housing more than one school organization. While schools share common spaces like auditoriums, gymnasiums, and cafeterias, each school is allocated particular classrooms and spaces for its own students' use.

Comment 23(a) asserts that this proposal will force administrators to focus on co-location rather than school needs.

As previously noted, co-location space needs are addressed by the Building Council, a campus structure consisting of the Principal of each school that meets regularly to address issues related to co-location and shared space usage. In addition to the Building Council, a Shared Space Committee will review implementation of a shared space schedule once a proposal has been approved by the PEP. Combined, the Building Council and Shared Space Committee aim to ensure that time in shared spaces is equitably distributed and allocated with a focus on all schools' needs.

Though both of these structures require different programming meetings for the leaders of both schools, given that hundreds of schools across New York City are co-located, the DOE fully expects school administrators to be able to attend to building-wide needs in addition to school-specific needs.

Comment 87 inquires as to why the DOE decided to propose a co-location for BwCCS at K157, instead of considering other options in District 14.

Building space is scarce in many New York City neighborhoods. Given this reality and the growing enrollment needs of our 1.1 million students, we must use our existing public school buildings in the most efficient manner possible and have considered all available resources and options.

Comment 94(a) expresses that BwCCS is being forced out of its current space, and will close following the 2014-2015 school year if it does not receive a co-location site.

The DOE has proposed the co-location at K157 as the most appropriate way to ensure the long-term stability of BwCCS and the educational continuity of the students currently attending the school.

Comment 94(b) asserts that the community members from BwCCS have concerns about K157 as a co-location site following opposition to the proposal that has been voiced by members of the P.S./I.S. 157 community throughout the proposal process.

The DOE recognizes that proposed co-locations into a community that is seemingly against the proposal may seem alarming. However, the DOE believes that, if this proposal is approved, the school communities at P.S./I.S. 157 and BwCCS will be able to create productive and collaborative partnerships. Throughout the process for this proposed co-location, the DOE has engaged in multiple conversations with P.S./I.S. 157 leadership, BwCCS leadership, and

the District 14 Superintendent about ways that the two school communities can successfully come together if this proposal were to pass. The DOE is confident that if this proposal passes then both schools can have a collaborative, successful, and amicable relationship.

Comment 94(c) inquires as to why the DOE is not considering co-locating BwCCS at Building K297.

To clarify, P.S. 297 Abraham Stockton (“P.S.297”), a district elementary school serving students in grades kindergarten through five in building K297 is not closing. P.S. 297 is currently co-located with The Ethical Community Charter School (“TECCS”). TECCS recently applied for renewal to its charter authorizer, the DOE, and was denied renewal. TECCS was notified of this decision on March 5, 2015. TECCS has been afforded until April 20, 2015 to submit a written response to the nonrenewal decision, as well as an opportunity to present oral argument to a three member panel. After consideration of TECCS’s written response and any oral argument held, the panel shall make a recommendation to the Chancellor as to whether the non-renewal should be reversed. Thereafter, the Chancellor shall make a final determination as to non-renewal.

BWCCS’ suggestion that P.S. 297 or TECCS is closing and that currently occupied space will be available in the 2015-2016 school year is premature. TECCS’ status for the 2015-2016 school year will not be resolved until TECCS is afforded an opportunity to be heard and the Chancellor makes a final determination. Therefore Building K297 will not be considered for any additional use at this time.

Comments 7(b), 8(b), 44(a), 59(a), 60, 61(a), 63 and 79 are not directly related to this proposal and thus do not require a response.

Changes Made to the Proposal

No changes have been made to the proposal.