



Charles County Public Schools

Kimberly A. Hill, Ed.D.
Superintendent of Schools

Michael L. Heim
Assistant Superintendent of Supporting Services

5980 Radio Station Road
P.O. Box 2770
La Plata, MD 20646
Main line: 301-932-6610
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Supporting Services: 301-934-7270
Maintenance: 301-934-7288
Operations: 301-934-7283
Planning & Construction: 301-934-7290
Transportation: 301-934-7262

November 17, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

Re: Comments on School Allocation Policy Changes

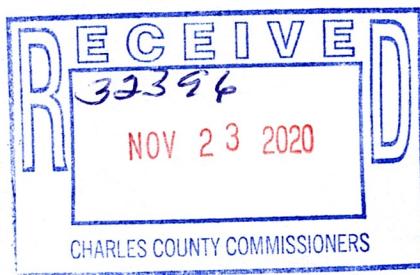
Dear Commissioners,

This correspondence includes comments from the Charles County Board of Education and Charles County Public Schools staff. These comments are being submitted in response to the proposed changes to the School Allocation Policy and should be recorded as comments received for the Commissioners Public Hearing held on October 20, 2020.

Please direct any questions or comments to Amanda Kline at akline@ccboe.com.

Thank you,

Amanda Kline
Executive Assistant, Supporting Services
Charles County Public Schools



It's all about teaching and learning.

Steven M. Andritz
Director of Planning & Construction

April K. Murphy
Supervisor of Operations

Bradley J. Snow
Director of Transportation

Steven T. Vance
Supervisor of Maintenance



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October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Mike Heim, CCPS**

Dear Commissioners,

My name is Mike Heim. I am the Assistant Superintendent of Supporting Services for Charles County Public Schools. One of my responsibilities with the school system is to analyze student enrollment trends to develop an annual Capital Improvement Program to address enrollment growth through proposed construction projects, facilitate redistricting meetings, and to develop a preventive maintenance plan for existing buildings.

I realize growth is inevitable based on Charles County's proximity to the metropolitan area. I am not opposed to growth as long as it is managed in a way that the infrastructure (schools, roads, water and sewage) needed to support population increases are in place or have sufficient funding to address needed upgrades.

The original proposal presented to the Commissioners on June 2, 2020 limited the granting of exemptions to Option 1 (The Development District) or Option 2 (The Opportunity Zone). The amended draft that includes other PFA's (Priority Funded Areas) greatly increases the number of areas of the county that could see development occur for schools that do not have access to public water and sewage. Even if construction funding is available for new construction or additions, there are concerns with increased enrollments at schools on private wells and septic systems due to demand loads. The State (IAC – Interagency Commission on School Construction) strongly encourages that new school facilities be served by public water and sewage.

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Steven M. Andritz
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CCPS suggests not including PFA's outside of the Opportunity Zones, such as areas of Hughesville, Benedict, Bel Alton, Newburg, Swan Point, Cobb Island, White Plains, and the towns of Indian Head and La Plata for possible exemptions from school seat allocations if they meet one of the three criteria:

- #1 WURC Zone – Waldorf Urban Redevelopment Corridor Zones.
- #2 Mixed-Use.
- #3 contain 25% Affordable/Workforce Housing.

The majority of CCPS school facilities are located in PFA's, but the rural schools that are located in PFA's have space/land limitations that may prevent the option to construct an addition to the building or the ability to add relocatable classrooms along with the aforementioned concern of a lack of access to public water and sewage. Schools in the rural PFA's are more difficult to provide relief during redistricting because of the large attendance zones they serve and the dispersion of students. Additionally, the length of bus rides can exceed 45 minutes. Longer bus rides can lead to behavioral issues and other safety concerns.

School system staff has suggested to Planning and Growth Management staff issuing 400 allocations a year instead of the proposed 800 allocations a year for Priority Development Projects. The proposed 800 allocations could double the amount of yearly allocations available through all sources including St. Charles (per Docket 90), the school allocation waiting list, bulk allocations, DRRA, and the Towns of La Plata & Indian Head.

We all need to take the time to familiarize ourselves with potential changes to La Plata's policy that could greatly increase the number of available allocations issued by the town. The town may issue 5,000 school seat allocations through 2032. Typically, the town issues less than 100 per year. The change in policy would allow upwards of 500 allocations per year so there needs to be collaboration between the town and county government so the school system does not get caught in the middle.

It's all about teaching and learning.

Steven M. Andritz
Director of Planning & Construction

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CCPS needs sufficient construction funding to keep up with enrollment growth through added capacity at schools, but cannot direct all funding to new construction while ignoring needed renovations. The average age of a CCPS facility is around 27 years of age so funding is needed for renovations and major systemic upgrades or replacements. An MOU should be created between county government and CCPS to detail how the school system will be adequately funded to address future enrollment growth in a manner that does not negatively impact students.

Students have the most to lose when adults who make decisions that influences a student's education do not work together and take into consideration how these changes can affect a student's ability to learn.

Sincerely,

Mike Heim
Assistant Superintendent of Supporting Services
Charles County Public Schools

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Steven M. Andritz
Director of Planning & Construction

April K. Murphy
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October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

Re: School Allocation Policy Changes
Comments from Steve Andritz, CCPS

Dear Commissioners,

My name is Steve Andritz and I am the Director of Planning and Construction for Charles County Public Schools. Below are the comments I shared at the October 20 Public Hearing regarding the Adequate Public Facilities Manual. I have been with Charles County Public Schools for 13 years and involved with the school allocation process for over 20 years. In the past, there have been changes to the policy that were made after committees and stakeholders were engaged. The changes that arose from these committees represented the best compromises based on all the data and stakeholder involvement.

I wanted to clarify and provide staff positions on several items:

- It has been presented in various public forums that Charles County Public Schools is sitting on 3,720 available school seats and that Charles County's APF policy is the most restrictive in the state. This data is derived from the April 29, 2020 County Commissioners and Board of Education Joint Meeting, School Allocations for the Annual 2020 Cycle.
 - As of September 30, 2019, there are 793 actual seats based on State Rated Capacity (SRC) and official September 30th enrollment.
 - The 3,720 represents 110% of SRC and any added CIP capacity, scheduled to open within 18 months, as allowed by the policy.
 - The 3,720 is also the total of Elementary (1,212), Middle (350), and High (2,158).
 - The current policy requires capacity at all three levels and this is not proposed to change. The limiting level is Middle school (350) and therefore, only 350 additional allocations can be offered.

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Steven M. Andritz
Director of Planning & Construction

April K. Murphy
Supervisor of Operations

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- A significant proposed change allows allocations to remain valid for 5 years, as opposed to the current policy of 2 years for allocation with the ability to request an extension of 2 years. These allocations are time sensitive commodities and should be moved through the development process as quickly as possible. The current 2 year life expectancy should be ample time for a developer to record lots and permanently lock in the allocation. If more time is needed, the developer has the ability to request an extension of 2 years. The strict adherence to the time limits on allocations is even more important when you implement the change of offering allocations using the student yield factors by housing type.
- The proposed legislation allows for 800 allocations to be granted to priority development projects. This number will in essence double the amount of yearly allocations currently available through all sources; St. Charles, school allocation waiting list, bulk allocations, DRRA, and the Towns of La Plata & Indian Head. The number of allocations for priority development projects should be reduced to 400 allocations a year. This is more than adequate for any stage of development for Waldorf Station based on their Development Agreement approved by the Commissioners on July 7, 2020. This also allows for future projects.
- The legislation allows for Priority Development Project (PDP) to be exempt from school allocations if the projects are located in the Priority Funding Areas (PFA). There are a number of PFA's across the county including Waldorf, White Plains, Bryans Road, Hughesville, Benedict, Bel Alton, Newburg, Swan Point, Cobb Island and the towns of La Plata and Indian Head. Not all of these PFA's are scheduled to receive new schools, renovation/expansions of existing schools or building additions in the current CIP. Any PDP in the rural PFA's create significant challenges when new students arrive at the school and will likely result in expanded class sizes, overcrowding, the use of additional portable classrooms and future redistricting. Not all of the existing PFA's have public water and sewer or other adequate facilities.
- The draft "School APF Eligibility List 2020" presented at the April 29, 2020 Joint meeting between the County Commissioners and the Board of Education contains 28 subdivisions, 18 of which have approval dates that will be 6 years old or older by the time the legislation is passed (December 31, 2020). These 18 subdivisions need 811 allocations and 25% would allow 202 additional allocations, based on the sunset provisions.
 - The sunset provisions will add 200+ allocations a year for the next 4 years.

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- Applying the new method of allocating to projects using the student yield factor, the projects that will be allowed to move forward in the first 4 year will generate 317 students.

The Charles County Commissioners also need to consider the development impacts that will be generated from projects within the incorporated Town of La Plata. Charles County Public Schools have several schools located within the incorporated Town of La Plata but the attendance zones for these schools serve both the County and the Town. The Town of La Plata code section 173-95 allows the Town Council to adopt the amount of yearly allocations with the caveat that “in no event shall the number of school seats available for allocation in each fiscal year be less than one hundred (100)”. The Town of La Plata has a significant development project that is looking to secure 3,100 school seats, starting in 2022, and continuing for the next 10 years. The Town of La Plata is planning for over 5,000 dwelling units for 2021 to 2032.

These additional units coupled with the changes being considered by the Commissioners will have a significant impact on Charles County’s schools and will lead to overcrowding. It can take as much as seven years to bring a new school from the planning and design phase to construction completion. With the state’s limited construction funding and the need for schools to be overcrowded before the state approves a new school, Charles County Public Schools is facing the potential of significant overcrowding and unpopular redistricting where students are moved around just to balance the overcrowding.

Charles County is a growing county and with any new development comes the pressures on existing schools for capacity and new schools. Charles County Government, in consideration of the growth in the Town of La Plata, and the Board of Education need to work together to develop changes to the APF manual that allow for controlled growth and adequate funding to build, operate, maintain and staff schools.

Sincerely,

Steve Andritz
Director of Planning & Construction
Charles County Public Schools

It's all about teaching and learning.

Steven M. Andritz
Director of Planning & Construction

April K. Murphy
Supervisor of Operations

Bradley J. Snow
Director of Transportation

Steven T. Vance
Supervisor of Maintenance

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Virginia McGraw, CCBOE**

Dear Commissioners,

I am Virginia McGraw, Chairman of the Charles County Board of Education. I am presenting testimony for the record regarding our concerns about the proposed legislative changes to the Adequate Public Facilities Manual. We believe that there has been a lack of transparency throughout the process.

When the Planning and Growth Management staff were tasked by the Planning Commission to develop proposals for changing the Adequate Public Facilities manual, were the citizens and key stakeholders notified in advance? Typically, in the past, a committee was formed that included Board members, CCPS staff, stakeholders and County staff. This diverse group had an opportunity to provide input as the proposed legislation was drafted. There was an exchange of dialogue among the committee members, giving everyone a better format for understanding each member's perspective and questions. As a result, compromises were reached; changes were proposed and were subsequently accepted by the Commissioners during a similar school adequate facilities process in 2016. This did not happen this time around.

Secondly, a meeting was held on February 5, 2020 between CCPS staff and PGM staff about the current process for allocating school seats. We asked PGM staff if there were any pending changes to the school allocation process. We received no response. It was later discovered through a different meeting in May with PGM staff and some CCPS staff that PGM had been tasked with developing proposals months before the February meeting took place.

Thirdly, at the annual Joint School Allocations Cycle meeting between the Board of Ed and County Commissioners on April 29, there was no mention of possible revisions to the current policy to affect subsequent years to follow...yet, shortly after on June 2, 2020, Planning Growth and Management staff made public, possible options to revise the current APF manual...which included revising school allocations.

Overall, we believe there has been a lack of transparency with this process. Specifically

1. There has been little or no advance notice of next steps
2. Documents are difficult to find and/or access on the county's webpage
3. The timing of the entire process coincided with a number of events that distracted the public's attention, i.e. summer break, the pandemic and other social and political events around the country.

This lack of transparency contributed to the lack of collaboration with the Charles County Board of Education and County Commissioners for such an important issue that affects our schools. I respectfully ask that you keep the record open for 30 days. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Virginia R. McGraw". The signature is fluid and cursive, with "Virginia" on the top line and "R. McGraw" on the bottom line.

Virginia McGraw

Chairman, Charles County Board of Education

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Latina Wilson, CCBOE**

Dear Commissioners,

The Board of Education of Charles County would like to communicate our concerns regarding the proposed changes to the current APF manual and the impact on Charles County Public Schools. The statements below were shared by Latina Wilson, CCBOE Vice Chairman at the October 20, 2020 Public Hearing.

Additional funding will be required to address the capacity demands generated by Priority Development Project exemptions and additional housing units allowed to move forward through the sunset provisions.

- ❖ The funding will need to be separate and apart from the State/Local CIP process as the Board has a program to address aging facilities while adding capacity. Keep in mind, the CIP process can take up to seven years before the school is built.
- ❖ The funding may need to be 100% local funding to address capacity as the State has not been fulfilling the needs of Charles County Public Schools, i.e. FY2021 CIP requests totaled \$32,807,000 and the State approved \$9,752,962.00.
- ❖ We cannot keep up. This is without the added pressure of growth and capacity projects.
- ❖ The average age of a CCPS facility is around 27 years of age so funding is needed for renovations and major systemic upgrades or replacements.
- ❖ Portable classrooms are not the answer to capacity issues and funding for additions or new schools needs to be prioritized by the county while still allowing funding for renovations of older facilities.
- ❖ Operational funding will be necessary to deal with the additional classroom/teacher supports that go along with overcrowding; such as additional staff members for increased class sizes, floating teachers, displaced programs, portable classrooms, additional lunch shifts.

- ❖ Charles County Public Schools supports revenue streams that are dedicated to schools and public education so that funding is continuous and reliable.
- ❖ Consider an additional fee or tax on properties exempted from the allocation policy to support additional operating funds for teacher staffing and student support needs.
- ❖ There isn't enough time given to us today to address the many issues presented today.
- ❖ There is a complete omission and analysis of the operational funding requirements associated with the proposed changes.
- ❖ Keep the record open for 30 days.
- ❖ Form a task force immediately. It should mirror the Rural Planning & Zoning Task Force and given a minimum of 6 month to develop findings.

Sincerely,



Latina Wilson
Vice Chairman, Charles County Board of Education

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Michael Lukas, CCBOE**

Dear Commissioners,

The Board of Education of Charles County would like to communicate our concerns regarding the proposed changes to the current APF manual and the impact on Charles County Public Schools. The statements below were shared by Michael Lukas, CCBOE Board Member at the October 20, 2020 Public Hearing.

Charles County Public Schools always appreciates the opportunity to work collaboratively with local government in order to meet the needs of all stakeholders in our county. Last year, members of your economic development team came to the Board of Education with information concerning Waldorf Station. The board appreciated this gesture and subsequently agreed that Waldorf station should proceed despite the fact that it was not in alignment with the current APFO guidelines.

On the 2nd of June this year, the commissioners were given a presentation by Planning and Growth Management which included proposed changes to the APFO and more specifically changes that directly affect Charles County Public Schools.

The elected Board was afforded the opportunity to see the presentation by Mr. Groth and Mr. Yeckley during our September meeting, and at this time learned of the VAST amount of proposed changes to the APFO. These changes greatly exceeded what was presented to us last year by your economic development team.

The elected Board of Education stipulated to proposed changes to the APFO allowing development in opportunity zones even when sufficient school allocations do not exist. We have codified this stance in a letter to the commissioners.

Proposed changes to the APFO as delivered by your Planning and Growth Management Department would allow similar development in PFA's or Priority Funding Areas. This has the potential to cause an even greater impact to the school system than the development of the opportunity Zone.

In the interest of the school system and all stakeholders in the county, collaboration to discuss the PFA's is appropriate and the school system cannot, at this time, support the proposed development of the PFA's without further dialogue.

We look forward to working together to do what's best for the citizens of Charles County.

Sincerely

A handwritten signature in black ink, appearing to read "Michael Lukas".

Michael Lukas

Board Member, Charles County Board of Education

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Jennifer Abell, CCBOE**

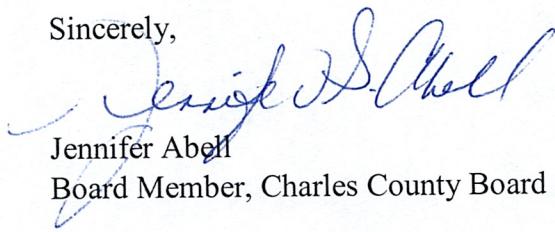
Dear Commissioners,

The Board of Education for Charles County would like to communicate our concerns regarding the proposed changes to the current APF manual and the impact on Charles County Public Schools. The statements below are from Jennifer Abell, CCBOE Board Member and should be recorded as comments received for the Commissioners Public Hearing held on October 20, 2020.

- Do not include areas outside of the Opportunity Zones, such as in areas of Hughesville, Benedict, Bel Alton, Newburg, Swan Point, Cobb Island, White Plains, and the towns of Indian Head and La Plata for possible exemptions from school seat allocations if they meet one of the three criteria:
 - #1 WURC Zone – Waldorf Urban Redevelopment Corridor Zones
 - #2 Mixed-Use,
 - #3 contain Affordable/Workforce Housing
- The original proposal presented to the Commissioners on June 2, 2020 limited the granting of exemptions to Option 1 (The Development District) or Option 2 (The Opportunity Zone). The amended draft greatly increases the number of areas of the county that could see development occur for schools that do not have access to public water and sewage. Even if construction funding is available for new construction or additions, there are concerns with increased enrollments at schools on private wells and septic systems due to demand loads. The State (IAC – Interagency Commission on School Construction) strongly encourages that new school facilities be served by water and sewer.
- Most schools outside of the Development District are not scheduled for renovation/expansions. Priority Development Projects can create pressures on these schools, leading to overcrowding, expanded class sizes, need for additional portable classrooms, and/or redistricting.
- The majority of CCPS school facilities are located in PFA's, but the rural schools that are located in PFA's have space/land limitations that may prevent the expansions or the ability to add portable classrooms.

- Schools in the rural PFA's are more difficult to provide relief during redistricting because of the large attendance zones they serve and the dispersion of students. Additionally, the length of bus rides can exceed 45 minutes, which tends to be a critical point where behavior issues can arise.
- Most of the rural PFA's do not have the infrastructure to support mixed-use development, i.e. roads, water/sewer, high-speed internet, fire suppression, etc.
- The majority of rural PFA's will have trouble qualifying under the exemption for mixed use as the business/commercial components will be difficult to find appropriate users to support in the rural areas. There are existing mixed use development projects in Waldorf (i.e. Westchester at the Pavilion) where commercial spaces are underutilized.
- The only potentially viable exemption for the rural PFA's is for 25% affordable/workforce housing and based on the examples presented by PGM staff, the projects will need to be apartment projects that rely on public water/sewer.
 - If these are built, there will be small population centers without the necessary services to support the residents and more vehicular trips will be required.

Sincerely,



Jennifer Abell

Board Member, Charles County Board of Education

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from Elizabeth Brown, CCBOE**

Dear Commissioners,

The Board of Education for Charles County would like to communicate our concerns regarding the proposed changes to the school allocation policy and the impact on Charles County Public Schools. The statements below were shared by Elizabeth Brown, CCBOE Board Member at the October 20, 2020 Commissioners Public Hearing. These comments pertain to the effects of a lack of collaboration and insufficient funding.

- Students have the most to lose when adults who make decisions that affect a student's education do not work together and take into consideration how these changes can affect a student's ability to learn. Overcrowding leads to larger class sizes, crowded hallways, crowded school buses, students eating lunches outside of normal times since cafeterias can only seat so many students and most importantly how instruction is delivered.
- A higher student to teacher ratio can affect how much time a teacher has to identify struggling learners and then to work one on one with students who may need additional explanation of content. Larger class sizes makes it more difficult for teachers to build relationships with students. Smaller classes have a tendency to be more cohesive and typically have less behavior management issues.
- Overcrowded schools with space issues often have teachers who are not assigned to their own classroom. Schools with more teachers than classrooms have to create flexible schedules in which some teachers have to move around the building to teach in classrooms that are empty for a block or period while the teacher assigned to the classroom on a full time basis has their planning period. Teachers displaced during their planning time are often displeased. Teachers who float typically have lower morale that can lead to teacher retention issues. Teachers placed in those situations have a difficult time bringing their resources and manipulatives from classroom to classroom, as they move around during the day thus affecting the quality of instruction.

- The aforementioned concerns can lead to teacher retention issues. Teachers seek transfers to less crowded schools within the same school system or unfortunately seek employment with other school systems. Low employee moral can affect how effective a teacher is in the classroom and the relationships they build with students, their colleagues, and the school's administration. Due to national teacher shortages, school systems must do all they can to retain good teachers.
- One short-term solution for overcrowding is to place relocatable classrooms on campuses. Some teachers and parents have concerns when students are assigned to relocatable classrooms when there is not enough existing space in a building to accommodate all students and teachers. Teachers and parents express safety and security concerns. Most relocatable classroom or modular buildings do not have running water so students, teachers and parents have concerns about the lack of restrooms and the inability to wash their hands. Some parents express concern about the safety of portable classrooms during severe weather events even though drills have students and staff coming into the main building.

Sincerely,



Elizabeth Brown

Board Member, Charles County Board of Education

October 20, 2020

Commissioners of Charles County
200 Baltimore Street
La Plata, MD 20646

**Re: School Allocation Policy Changes
Comments from David Hancock, CCBOE**

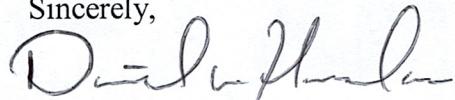
Dear Commissioners,

The Board of Education for Charles County would like to communicate our concerns regarding the proposed changes to the current APF manual and the impact on Charles County Public Schools. The statements below were shared by David Hancock, CCBOE Board Member at the October 20, 2020 Commissioners Public Hearing. These comments pertain to reducing the number of exemptions when granting school seat allocations.

- The proposed legislation allows 800 allocations to be granted to priority development projects. CCPS requests to see the granting of exemptions capped at 400 a year instead of the proposed 800 a year for Priority Projects in the Opportunity Zone. This would satisfy any of the stages for development for Waldorf Station and allow for future projects by other developers within the Opportunity Zone. This number will in essence double the amount of yearly allocations available through all sources: St. Charles (Docket 90), school allocation waiting list, bulk allocations, DRRA, and the Towns of La Plata & Indian Head. This number should be reduced to 400 allocations a year. This is more than adequate for any stage of development for Waldorf Station based on the Development Agreement approved by the Commissioners on July 7, 2020.
- Granting 800 seats per year in addition to the aforementioned projects would potentially create more growth than CCPS could address through the traditional CIP (State and County share of construction) process for securing funding for school construction. The CIP process for building a new school can take up to 6 or 7 years before the school is ready to open. The draft legislation may provide predictability for the County Commissioners and the development community, but it does not provide predictability for CCPS to address enrollment increases in schools without adequate funding for construction and additional staffing.

- Based on recent comments from the Executive Director (Mr. Robert Gorrell) of the IAC (Interagency Commission on School Construction), CCPS can expect to receive around \$10 million a year for school construction and systemic maintenance for various projects. The \$10 million a year is based on a ten-year average. The issue with the average is when your future needs increase you are still receiving funding based on your previous ten years. Increases in school seat allocations need to be gradual to align with State funding unless the county can locally fund needed additions or construction of new schools.
- If the commissioners reconsider removing the inclusion of PFA's outside of the Opportunity Zone or Development District for exemptions, 400 allocations a year would be sufficient for development in the two areas. The original proposal only offered exemptions for Priority Projects in the Development District (Option 1) or the Opportunity Zones (Option 2).

Sincerely,



David Hancock
Board Member, Charles County Board of Education