The Montgomery County Council of Parent-Teacher Associations

Comments on Draft
Facilities Assessment with Criteria and Testing (FACT)
Committee Report
May 17, 2010

To: Bruce Crispell, MCPS Division of Long Range Planning

The Montgomery County Council of Parent-Teacher Associations ("MCCPTA") is pleased to present the comments of its two representatives participating on the draft report summarizing the FACT Committee's deliberations.[1] This document provides the joint comments of Kay Romero, President of MCCPTA, and Steve Augustino, CIP Chair. Please note that the comments below reflect the views of MCCPTA's representatives in their individual capacities. The comments have not been adopted by MCCPTA, and do not necessarily reflect the position of the organization as a whole. In addition, MCCPTA anticipates that its cluster coordinators and many of the individual school PTAs will submit comments on the draft report. We urge MCPS and the Board of Education to give due consideration to the entire range of comments it will receive.

Background

As described in the draft report, the FACT Committee met on two occasions, March 16, 2010 and April 19, 2010. The Committee was asked to "generate comments on the existing FACT methodology and identify where changes, deletions, or additions may be needed."[2] Kay Romero, MCCPTA President, and Steve Augustino, MCCPTA CIP Chair, participated on the Committee on behalf of MCCPTA.

For many years, MCCPTA has asked the Board of Education and the County Council to work with parent representatives to address long range capital needs for our schools. MCCPTA has been concerned that the pace of modernizations is too slow and that the increase in the number of school facilities puts us at risk of falling even further behind.

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[1] Email from Bruce Crispell, Director, Division of Long-Range Planning, MCPS, to Michael Allnut, *et al.*, Apr. 29, 2010 (enclosing draft report of the FACT Committee deliberations). Mr. Crispell's email notes that, at the same time that the draft report was distributed to committee members, it also was distributed to school PTA presidents, cluster coordinators, other MCCPTA officials and the Board of Education. Committee members did not comment on the draft document prior to its release, nor have committee members been asked to vote on or adopt the report. This is the first opportunity committee members have had to review the draft document.

[2] FACT Committee Charge, at 2 (Mar. 16, 2010).

Thus, MCCPTA has sought both a plan to accelerate the modernization of schools that are falling below our infrastructure standards and a comprehensive plan to maintain and renew our newer buildings. The FACT assessment process is a key to the first goal, and also has an impact on the latter goal.

MCCPTA wishes to expeditiously assess the remaining schools that have not yet been assessed for modernization. Each year that there are schools that should be, but are not, assessed for modernization, means that the county falls farther behind and creates an even larger need for school construction. But MCCPTA has noted that the FACT criteria must be comprehensively reviewed before additional assessments are made. A comprehensive review of the FACT criteria will increase transparency, promote acceptance of the modernization schedules and help ensure that the criteria adequately reflect the gravity of the needs of each school. For this reason, MCCPTA supports the objectives of the FACT Review Committee and applauds MCPS and the Board of Education for moving forward with a review of the criteria.

Comments on Proposed Revisions to FACT Criteria

1. At the outset, we appreciate the opportunity to have participated in the FACT Review Committee and wish to thank the Division of Long Range Planning for giving thoughtful consideration to our comments and concerns expressed during the committee meetings. We agree with the statement in the report that such involvement by PTAs "is especially critical to developing confidence in the new FACT methodology." (Draft Report at 4). Employing an open process and giving ample opportunities for comment before any revisions are adopted are keys to promoting a fair outcome of the assessments themselves. We thus strongly support the idea that the Division continue to work with PTAs and their representatives as the FACT criteria are further developed.

2. We believe that the revisions suggested to this point are constructive. We generally believe that the draft FACT criteria (dated Apr. 27, 2010) represent an improvement upon the FACT criteria previously used. However, we strongly believe that the process of updating the criteria is incomplete. The Board should not use the April 27 criteria without further development and public input. We believe it is premature to recommend use of the criteria as currently presented.

- The public should be given the opportunity to comment on the point values to be assigned to each criteria. Most critically, the draft criteria do not assign point values to the various considerations recommended. Although we support considering the factors listed, it is critical that we know what weight will be given to each of the criteria. The draft report acknowledges that the Committee did not develop these measures. (Draft Report at 3). For example, the recommendation calls for an assessment of the school facilities against current educational specifications. We support such an assessment, but no decision has been given as to how much weight will be placed on this matter. The assessments would be significantly altered if this criterion were given 1000 points (out of a presumed scale of 2000) vs. if it were given 500 points. Right now, we do not

fully understand how they will operate, which undercuts confidence in the potential outcomes (see comment 1).

The points assigned to each parameter are critical to the outcome of the assessment. A few examples from the previous FACT criteria will demonstrate the point. First, the prior criteria gave inordinate weight to whether a school was expected to be overutilized. That factor alone accounted for 900 of the possible 2000 points (45% of the total assessment), yet all generally agree that this is not an appropriate criterion to use. (See Draft Report at 2). Second, the previous criteria assigned much greater weight to the condition of the HVAC equipment than to the condition of the roof (For high schools, for example, HVAC was assigned a maximum of 248 points, while roofs were only assigned a maximum of 80 points). We are not confident that these criteria properly weighed the relative importance of these two elements in assessing the schools. Third, the prior criteria assigned <u>different</u> maximum point values for the same parameter, depending upon whether it was in a high, middle or elementary school. (HVAC, for example, has a maximum score of 248 for high schools, but 274 and 278 for middle and elementary schools, respectively.) For physical parameters at least, we are not sure that such differential weighting is appropriate.

Until the point values are assigned, it is impossible to determine whether the revised FACT criteria adequately evaluate the relative conditions of the schools.

- <u>The methodology for evaluating a criterion should also be developed and subjected to public comment.</u> In addition to determining the maximum point values for each parameter, we also need to understand what conditions will result in a school receiving specific point values up to the maximum. That is, the FACT review process thus far has <u>not</u> established the standards by which a school will be judged using the parameter. We recognize that these assessments should be performed by technicians skilled in the particular area, but these technicians must be given a methodology to evaluate the school on the point scale. Knowing what conditions justify minor markdowns and what conditions justify major markdowns will go a long way toward determining how well the FACT criteria will prioritize the schools for modernization.

3. We agree that systemic replacements should not be part of the modernization criteria. We strongly agree with the concept that components that are replaceable should not be a part of the FACT assessments. (See Draft Report at 2). By the same token, the Board of Education must commit that these components will be addressed at the affected schools. As a companion to another round of assessments, it is important that the Board of Education continue and expand its systemic replacement projects, such as HVAC replacements, roof replacements and PLAR. Schools that are on the modernization list, and schools that are not scheduled to be modernized, must have these core elements replaced and renewed on a regular basis.

4. We recommend that the Board evaluate the appropriateness of the 1985 cut-off date for assessing schools for modernization. Although generally MCPS began following different procedures for modernizing schools around this time, the buildings constructed or modernized between 1985 and 1990 are already 20-25 years old. It is possible that some of these schools will need major rehabilitation or modernization as well. Therefore, we recommend that the Board consider whether a different cut-off date for assessments is more appropriate, or whether exceptions to the cut-off could be considered on a case by case basis.

5. We are concerned that there is no plan for modernization or rehabilitation of the special education centers. RICA, Rock Terrace, Sandburg and Stephen Knolls are not scheduled to be assessed in this process, despite last construction/mod dates as follows: RICA (1977), Rock Terrace (1974), Sandburg (1962) and Stephen Knolls (1979). We urge the Board of Education to develop a strategy for keeping the special centers in good condition.

6. We agree that schools currently on the modernization list should keep their existing order for modernization. Any schools assessed using the new criteria should be added after the existing list. No school with an existing FACT score should be delayed by the assessment of additional schools.

7. Finally, if Northwood remains the only high school to be evaluated for modernization, we question whether it is cost-effective to assess Northwood according to the FACT criteria. Regardless of its score, as currently proposed, Northwood would be the only high school to be evaluated, and it is certain that it would be added after the last high school on the current modernization list (Damascus HS). It does not seem necessary to assign Northwood a numerical score in this situation.

Once again, we thank the Division for its conduct of the FACT Review Committee meetings, and we appreciate the opportunity to comment on the draft report summarizing those meetings. We recommend that MCCPTA representatives continue to be consulted as the FACT criteria are further developed, and we support additional public comment on the criteria before they are used to evaluate additional schools for modernization.

Respectfully submitted,

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CIP Chair