

Memo to: Arlington School Board  
 From: Advisory Council on School Facilities and Capital Programs (FAC)  
 Re: Revisions to Policy B-2.1 Boundary Policy and PIP  
 Date: 22 MAR 2024

The FAC has been charged to advise on the condition and sufficiency of Arlington Public Schools” (APS) capital infrastructure. School boundaries have significant impacts on the use of APS facilities and supporting services, such as transportation. APS Facilities and Operations (F&O) staff are point on efforts to keep student enrollment aligned with the capacity of our school facilities. Among the strategies available to staff to keep facility capacity utilization in sync with enrollment is to recommend boundary adjustments.

While boundaries changes are not the preferred method to align facility capacity with enrollment, having a policy that establishes a transparent and predictable process is essential to manage public expectations while ensuring enough flexibility to consider impacts on a student-by-student basis. The proposed policy revisions, in general, achieve these objectives.

With that said, some improvements to draft Policy B-2.1 and accompanying Policy Implementation Procedure-1 (PIP) are warranted for greater clarify and understanding, as follows:

**Missing from the policy**

- Swing Space: New school construction historically required boundary adjustments. One of the options to lower costs and complete construction more quickly and safely for students, staff, and community users, is not to phase construction while facilities are occupied. Using swing space is a way to achieve these outcomes. We understand that this policy will also be a basis for determining whether swing space is recommended. If that is the case, we recommend some reference to swing space be added as appropriate. (See following “Edits for Clarification.”)

**Edits for Clarification**

Policy Recommendations

Line	Text/Edit Recommendation	Comment
12	“one or more of the following conditions”	Are the “conditions” listed in priority order? If not, should they be? If the priority of “conditions” would be expected to change, the number “1” to “4” should be replaced with bullet points.
15	“capacity, including relocatables, for the”	Similar language is on the PIP.
23-24	“Every two years, Arlington Public Schools shall review whether boundary changes or adjustments are to be considered every two years.”	

24-25	“...within the context of the capital and enrollment planning processes, <u>and in association with the long-range plan to renovate existing schools.</u> ”	This clause should be added since many of the reasons to consider a boundary change (described in lines 14-20) would be supported by information from the LRP.
27-28	“...the School Board shall hold a public hearing, no less than seven (7) days after <u>it has been publicly advertised reasonable notice</u> to the ...”	The terminology should be consistent with that used by ACG.
34-35	“the Superintendent shall recommend to the School Board <del>the process a plan for consideration of implementing the</del> boundary changes <u>process.</u> ”	The policy already states what the “process” is – Superintendent notification to the Board by a time certain, the Board holding a public hearing and giving notice by a time certain, and the Board’s final decision by a time certain. The “process” should not change, but a plan to implement the process.
37-46	Add to list of questions “ <u>What would happen if no boundary change were made?</u> ” (or text to that effect).	APS staff must consider and present to School Board the results of inaction – whether that is financial waste (cost of underutilized facilities and cost of staffing), inequities elsewhere in County, lower learning, etc.
42-43	“Who will be on the front lines of the change?”	Not sure what this means. Suggest clarifying and rewriting.
44	“What else is occurring that may cause challenges for staff and/or families?”	The effects on staff and families <u>must both</u> be considered and not left to an “and/or.”
62	“ <del>The Superintendent staff</del> may propose that the ...”	

**Possible Unintended Consequences**

Policy Recommendations

Line	Text/Edit Recommendation	Comment
28	“not less than seven (7) <u>working</u> days ...”	It is felt that a “public hearing” merits more advance notice than a possibility of only 7-days, which (as written) means calendar days. FAC suggests at least extending the “no later than” notice to the public to at least 7 working days.
29	“... community and the public <del>in a newspaper of general circulation</del> <u>through multimedia sources</u> in Arlington County.”	Relying on a “newspaper” to be the source of public notice is biased and dated. It is unlikely that Arlington citizens rely on newspapers for this type of information. Notice should be provided through multimedia sources. (The PIP uses the phrase “multiple communication channels.” Line13.)
83	“utilize multimodal transportation options.”	“multimodal transportation options” is too broad to be meaningful. What is the policy goal/intention? If

		it is to allow students to walk or ride bikes, then this should be made clear. “Proximity” would not necessarily apply if a student were using a bus or car. We may have additional comments once staff clarifies this text.
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**Other comments**

In general, the terms “will” and “shall” should be reviewed throughout the Policy (and PIP) to ensure consistency of usage.

Policy Recommendations

Line	Text/Edit Recommendation	Comment
56-57		FAC supports policy on managing enrollment due to “new developments which are not yet occupied.”
69-72		FAC supports policy minimizing boundary changes affecting an individual student at the same address.

**Comments related to the PIP**

PIP Comments:

Line	Text/Edit Recommendation	Comment
10	“beginning no later than the <del>Fall</del> <u>the second School Board meeting of the school year</u> ”	The Policy says, “no later than September.” The “Fall” begins ~22 September. It would be better to use the same language or say something like the “second School Board meeting of the school year ...”
14, 17, 19, 25	“ <del>Department of Planning and Evaluation</del> <u>Department of Facilities and Operations</u> ”	The DPE in the Superintendent’s office has been eliminated and the functions moved to DFO.
22	“... engagement process, <u>as described below.</u> ”	Added for clarity.
54-60	APS “may indicate the level of engagement using the International Association of Public Participation (IAP2) Spectrum of Participation, <u>or explain why this metric was not used.</u> ”	FAC supports PIP metric to indicate the level of public engagement. This support prompts the recommendation that staff explain why if the metric was not used to foster transparency and accountability with regard to public engagement.
62	Considerations	Recommend that APS employ its Arlington Resident verification process as a check to considering boundary changes.
68	“...school <del>progress</del> <u>be assigned</u> to no more than two ...”	Intended for better clarity.

72	“a disparate <u>socioeconomic</u> disparate ...”	Adding “socioeconomic” modifier to “disparate impact” explains what demographic impact is being considered. This modifier is consistent with the Policy.
XX	<i>Metric to be determined.</i>	Missing from the PIP is a definition of “significantly,” a key term used to trigger one of the reasons for a boundary change. The PIP should articulate a range of what APS considers “significantly over or under” building capacity. Lack of some metric leaves too much room for interpretation and undermines the confidence that citizens will have in this standard.

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Thank you for your consideration of our comments. Please contact Cynthia Hilton, Acting Chair, FAC, if you have any questions.