Katherine B Bradley

BZA 17081

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BZA Case Number 17081
Testimony from Katherine Bradley
December 2, 2003

Intro

Good afternoon. My name is Katherine Bradley. I live at 2211 30th Street, NW in Washington, DC. For four years, I have served as the Board Chair for St. Patrick's Episcopal Day School, a Nursery through Grade 8 parish day school with the main campus on Whitehaven Parkway in Northwest Washington. I had the pleasure of appearing before this board several times in 2002 as St. Patrick's sought permission from the Board to locate our then-fledgling Grades 7 and 8 program at 4925 MacArthur Boulevard. Today, we are coming before you with what I hope is a much simpler matter—our desire to have an honest, clear, new cap on faculty and staff at our Elementary School campus. We are here addressing this issue because of research the ANC performed in 2002 relating to our 1990 order governing faculty and staff. We are able, as well, to hope that this is a straightforward case because of the ANC's support of this request and their generosity of spirit in deciding to look forward, with a clean slate, despite their serious opposition to the establishment of the Grade 7 and 8 program. On behalf of the school, I am grateful for their consideration and for the spirit of cooperation the ANC leadership has exhibited. We are pledged to do our part to make this a successful fresh start.

St. Patrick's is asking for a status-quo cap of 93 Full Time Equivalent (FTE) faculty, staff and administration. This is a status-quo request that will commit us to no net growth in employees without returning to the ANC and the BZA for permission. This is also status-quo in terms of impacts: We have ample parking, and this request presents no overflow issues for the surrounding neighborhood.

History

This request is not unusual in that it represents the first request for a revised cap in 13 years. What may be surprising, however, is an utter change in our representation of our status, given that when we stood before you in 1999 and again in 2002, we reported faculty and staff numbers way in excess of the 1990 cap of 60 employees, and we reported, matter-of-factly, that we *had a staff cap only—that we had no faculty cap.*

That statement was false. We believed it—I believed it—but we were wrong. During the course of the 2002 hearings, I learned—I actually learned it out in the hall right before I was to testify—that the 1990 hearing record showed we were wrong and that, in fact, our faculty and staff numbers had been out of compliance since sometime early in the 1990s when the total number of employees at St. Patrick's exceeded 60. Research done by the ANC uncovered this indisputable information showing that the 1990 order was always intended to govern all St. Patrick's employees and to cap them at 60 total employees.

The only correct recourse would have been for the school to have returned to the BZA as soon as its employees were poised to grow above 60. Given that we cannot now turn

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back the clock—we cannot recreate hearings for several smaller increases we should have requested across time —we want to admit responsibility for this error and come before you today to respectfully request a new, accurate cap on employees.

Fac-Staff Cap Request

Today St. Patrick's employs 92.7 FTEs, or full time equivalent employees. We believe strongly that using FTEs is the most accurate, conservative approach to counting our employees across time. Further, we fear that imposing a different kind of count –a "whole body count', for lack of a better word—could harm our part-time workers by discouraging the school from offering part-time employment, which exists for programmatic reasons and as a meaningful accommodation to teachers who have small children of their own or are phasing slowly into retirement.

We are requesting a cap of 93 FTES, which is a no-growth, status-quo request based on our current 92.7 FTEs. These 92.7 FTEs translate into 103 individual people – 77 full-time and 26 part-time. There is no "hidden hoarde" of people behind a mythical FTE figure. In fact, our "whole body count" – 103 people - is very close to our FTE count – 92.7 FTEs. Our part-time work force is not expected to grow as a percentage of the whole, although there are annual fluctuations, due usually to personal circumstances, such as when a teacher has a child of her own or when a teacher or staff member begins a multi-year phase-down to retirement. Our program has natural part-time positions, in our half-day nursery program, in our resource program, and in foreign language in our elementary school. We expect that this breakdown of full and part time will stay roughly where it is now, but with some fluctuations year-to-year, to accommodate individual life circumstances of our employees. We offer full benefits to part-time employees, so we have no incentive to let this part of our workforce grow across time. Even so, we have pledged to share our FT/PT breakdown with the ANC every year, so that they, too, will rest assured that St. Patrick's mix of PT to FT employees will not grow across time.

Choice of FTEs

We spent considerable time with our ANC discussing why we are moving forward with a cap request based on FTEs—a decision that, after significant discussion, the ANC did support. There are many ways to count employees, and after considering all of them, we have concluded that FTEs are not only the most accurate way to reflect actual employment at St. Patrick's, but that an FTE census is also the most accurate way to keep track of employee growth (or in this case, projected non-growth) across time.

Elementary schools are still heavily female in the composition of their workforces, and at St. Patrick's, our part-time positions make it possible for women who need flexibility and reduced working hours to continue in meaningful careers as they raise their families. Our part-time positions—either two or three day per week or half-day positions, coupled with our on-site infant-toddler center for faculty and staff children, has allowed us to be an exceptionally family-friendly place to work. We hope to address the need for a new cap without adversely affecting that very positive part of our program. Recognizing a three day per week worker, or someone who works 8 am to noon, as a ".6 FTE" is the accurate

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way to count someone who works three days per week, or who only works mornings. Moving away from this formula—in essence, forcing the school to count a .6 person as a full employee for parking purposes, may discourage the school, across time, from making these part-time positions available.

We recognize, however, that a workforce that say, doubled, because of part-time employment "creep" could, in fact, tax the parking situation we have. We have no actual incentive to let this happen across time, and we predict that the mix of part and full time we have will stay roughly constant, with some movement, year-to-year, but no trendline toward a significant part-time shift. We will, however, share our PT-FT breakdown annually with the ANC so that there is honesty and transparency between us, and so that the ANC can verify that we do not have part-time "creep" across time. We are also very comfortable with a condition that specifies that no more than, say, 1/3 of our total workforce may be part-time workers. Finally...

Impacts Associated

There should be no impacts associated with this request. We have 127 parking spaces total at St. Patrick's. 62 of these are located on school property, in the gymnasium. 23 are rented from the Army Corp on land contiguous to the school. 42 are diagonal spaces improved by the school when we put in sidewalks and the diagonal spaces on Whitehaven Parkway. These are leased from the DC Government. We have ample parking space for every employee—even at the time we've identified as the "peak time" for maximum people on campus at once, which happens to be Tuesday around 11 am, with 100 people present.

Using the FTE method of counting, and assuming our request for 93 FTEs, 62 spaces on school property covers the Elementary School parking requirement for 2 spaces for every 3 school employees, and St. Patrick's total parking covers all employees and visitors, except for rare special events, like Halloween parades or Christmas pageants. Should the Board prefer to issue a cap that specifies individuals, our count is 103, and we can also meet the parking requirement, although it would require using the Child Development Center rate—a step we would rather not take that results in a higher possible employee count.

Closing

We are grateful to the ANC for surfacing this issue. As we intend to be in compliance with the letter and the spirit of the law at all times, we are happy to be able to come forward and ask for this revision in our faculty and staff cap on Whitehaven Parkway. Thank you for your consideration.

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Katherine B. Bradley

Fax

To:	Sara Bardin	**From:**	Katherine Bradley
Fax:	202-727-6072	**Pages:**	3 to follow
Date:	2/11/2004		
Re:	Case Number 17081		

Ms. Bardin,

Per the request of the BZA and for the record, following please find the testimony of Katherine Bradley on December 2, 2003 pertaining to case number 17081.

With thanks.

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