



Dr. Robbie Fletcher  
Commissioner of Education

**KENTUCKY DEPARTMENT OF EDUCATION**  
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December 17, 2025

Mr. Alvin Garrison, Superintendent  
Covington Independent Schools  
25 East Seventh Street  
Covington, KY 41011

**RE: BG 25-393, COVINGTON IND.: Property Acquisition for Improved Campus Access  
Glen O. Swing Elementary School (Not on the DFP)  
Residential Property at 1923 Howell Street  
Covington, KY 40324**

Superintendent Garrison:

Pursuant to **702 KAR 4:050 Building Sites: Inspection, Approvals**, the Covington Independent Board of Education formally requested KDE approval to acquire the referenced property to improve access to the Glen O. Swing Elementary School Campus

The property is bounded on the north by a residential property, on the east by Howell Street, and by the existing campus to the south and west. The district reports that Chapman Street between the Glen O. Swing Elementary School campus and Howell Street is district-owned property. In response to our tentative approval letter dated July 29, 2025, for final approval consideration, the district has provided the following documents for review and information:

1. Letter dated September 30, 2025, by Corey T. Gamm, with Adams Law, PLLC, Counsel for Covington Independent Schools stating “that, in our opinion, fee simple title may be obtained by reason of a deed from Bell Property Management, LLC, a Kentucky limited liability company.”  
The opinion was for a period of more than sixty (60) years.
2. Commonwealth Land Title Insurance Company’s Commitment for Title Insurance dated August 29, 2025, indicating a policy amount of \$175,000.00.  
*Be aware that the Certificate of Title Insurance is required to be for an amount that is equal to or greater than the appraised value - \$230,000.00*
3. Topographic and Boundary Survey Plat information performed by Matthew Habedank, Kentucky Professional Land Surveyor PLS 4041, which indicated property boundaries, acreage, road access, easements, water and sanitary sewer, utilities, and certification that property is above the 100-year flood plain. The survey is dated December 17, 2025.
4. Utility Assurance Letters – Not Required.
5. Roadway Adequacy Letters:
  - a. STATE - Not Required.

- b. LOCAL GOVERNMENT: December 15, 2025, letter from the City of Covington stating "...the existing infrastructure, including Howell Street, is sufficient to support the proposed use of the property for improved campus access."
6. Potential Environmental or Safety Hazards – Limited Environmental Due Diligence by Patriot Engineering and Environmental, Inc.: Per Section 6.0, Conclusions "This assessment has revealed no evidence of potential environmental concerns (PECs) in connection with the property. Further Inquiry is not warranted.
  7. Schematic Site Plan – Not Required.
  8. Site Development Cost Analysis – Not Required.
  9. Certification that all reasonable sites have been reviewed - Not Required.
  10. Appraisal dated 08/29/2025, by Anthony J. Walsburger, with The Appraisal Company (State-Certified General Real Property Appraiser # 774) and commissioned by the Covington Independent School District indicating an estimated fair market value opinion of \$230,000.00.
  11. Proposed Purchase Agreement between Bell Property Management, LLC (SELLER) and the Covington Independent School District (BUYER) for a total purchase price of \$175,000.00, which is equal to the appraisal value.

Receipt of the above demonstrates substantial compliance with the requirements of 702 KAR 4:050. Approval is hereby granted to the Covington Independent Board of Education to proceed with the acquisition of the above referenced property subject to fulfilling the conditions set forth in the agreement and the requirements for receiving title insurance.

Submit an Initial BG-1 Project Application Form (in FACPAC) approved by the Covington Independent Board of Education which identifies the proposed fund source(s). **The proposed acquisition is not on the current District Facilities Plan (DFP), therefore, funding is limited to unrestricted funds and/or accessing restricted cash with a Capitol Funds Request (CFR) approved by the local board.** Include a signed pdf version of the BG-1 as an attachment to the FACPAC form submitted to our office.

As required by 702 KAR 4:050, within thirty (30) days after the closing, please provide a notarized copy of the executed deed and Certificate of Title Insurance (**in the amount of the appraisal**) to KDE. Submit these documents through the "My Document Submissions" in the SharePoint portal and submit your board-approved BG-5 with signatures through the FACPAC system to close the project.

If you have any questions about any of the above, please call us at (502) 564-4326.

Sincerely,

*Marshall Smith*

Marshall Smith,  
Assistant Director  
Division of District Support  
Office of Finance & Operations

MS/gtl

Ec: Eric Neff - CIS  
Tanesha Keene & Gary Leist, AIA – KDE  
DFP Site Acquisition Planning File/District Correspondence