



Public Comment Analysis¹

Date: June 24, 2011

Topic: The Proposed Re-siting and Co-location of Khalil Gibran International Academy (13K592) with the Metropolitan Corporate Academy (15K530) and the Brooklyn School for Career Development (75K753) in School Building K806

Date of Panel Vote: June 27, 2011

Summary of Proposal

The New York City Department of Education (“DOE”) is proposing to re-site and co-locate Khalil Gibran International Academy (13K592 “Khalil Gibran”), an existing middle school, from where it is presently located in building K287 at 50 Navy Street, Brooklyn, NY 11201, within the geographical confines of Community School District 13, to school building K806 (“K806”), located at 362 Schermerhorn Street, Brooklyn, NY 11217 within the geographical confines of Community School District 15. If this proposal is approved, Khalil Gibran would gradually stop serving middle school students in grades 6-8, and would instead serve high school students in grades 9-12 in K806. A “co-location” means that two or more school organizations are located in the same building and may share common spaces like auditoriums, gymnasiums, and cafeterias. In addition, a “re-siting” means a school will be located in a different building than the building in which it is currently located.

In a separate Educational Impact Statement (“EIS”) published on March 4, 2011, the DOE is proposing to implement a “grade reconfiguration.” Under this proposal, at the end of the 2010-2011 school year, Khalil Gibran would no longer enroll sixth grade students. All eighth grade students who meet promotional standards would apply to high school through the Citywide High School Admissions Process, and students in the sixth and seventh grades who meet promotional requirements would remain at the school until the completion of the eighth grade. During the 2011-2012 school year, Khalil Gibran would serve seventh and eighth grade students in K287. At the end of the 2011-2012 school year, Khalil Gibran’s eighth grade would be re-sited to K806. In 2012-2013, Khalil Gibran would only serve eighth grade students. After June 2013, Khalil Gibran would no longer serve any middle school grades.

¹ This Analysis of Public Comments reflects those public comments received to date. The DOE will continue to accept public comments until Sunday, June 26, 2011 at 6:00 p.m. If any additional comments are received, they will be addressed in an amended analysis.

If this proposal is approved, Khalil Gibran’s eighth grade class would be re-sited prior to the 2012-2013 school year and co-located in K806 with the Metropolitan Corporate Academy (15K530 “MCA”), an existing high school that serves students in grades 9-12, and the Brooklyn School for Career Development (K753@530 “SCD”), a District 75 (“D75”) high school that currently enrolls students who are emotionally disturbed in grades 9-12. SCD provides special education services to students who range in age from 14 to 21 years old and are classified with significant disabilities. SCD supports students who are working towards obtaining their New York State diploma or an Individualized Education Plan (“IEP”) certificate. There is a strong emphasis on curriculum, vocational skills as well as functional life skills to help students succeed after they leave school either for college, employment or post secondary options.

At the conclusion of the 2012-2013 year, Khalil Gibran would no longer serve eighth grade or any middle school grades. Khalil Gibran would continue to gradually phase-in high school grades by adding one grade each year, until it reaches full scale in 2015-2016 serving 9-12th grade. In 2013-2014, Khalil Gibran would enroll students in grades nine and ten. In 2014-2015, Khalil Gibran would enroll students in grades nine through eleven. Finally, in the 2015-2016 school year, Khalil Gibran would achieve full scale and serve approximately 300-325 students in grades nine through twelve. The DOE is proposing to re-site Khalil Gibran because the building where it is currently sited is not equipped to serve high school grades.

On February 1, 2011 the Panel for Educational Policy voted on and approved the proposal to phase out MCA due to its long standing performance struggles. Beginning in September 2011, MCA will no longer admit new ninth-grade students.

MCA would complete phasing out in June 2014. Thus, Khalil Gibran would only be co-located with MCA for two years. In the long term, K806 will only house Khalil Gibran and SCD.

The details of this proposal have been released in an Educational Impact Statement which can be accessed here: <http://schools.nyc.gov/AboutUs/leadership/PEP/publicnotice/2010-2011/Apr282011Proposals>. Copies of the EIS are also available in the main offices of Khalil Gibran, MCA, and SCD.

Summary of Comments Received at the Joint Public Hearings

Two joint public hearings regarding this proposal were held, one at Khalil Gibran / P.S. 287 on April 4, 2011 and one at MCA / SCD on April 14, 2011. At the hearings, interested parties had an opportunity to provide input on the proposal.

Approximately 15 members of the public attended the hearing on April 14, 2011 and two people spoke. Present at the meeting were: Community School District 15 Superintendent Anita Skop; Khalil Gibran Principal Beshir Abdellatif; Khalil Gibran School Leadership Team (“SLT”) representative Winsome Smith-Ranger; MCA SLT representative Tony Lambrides; SCD Principal Yvrose Pierre; P753K SLT representatives Christine Munnely, Anne Mingo, Emily Givens, and Darlene Shockness; Community Education Council (CEC) 15 representatives Mark Kolman and Jim Devor.

The following comments and remarks were made at the joint public hearings:

1. Representatives of Khalil Gibran’s School Leadership Team opposed the proposal to re-site Khalil Gibran for the following reasons:
 - a. Building K806 is an old building that lacks an auditorium, a cafeteria, and possibly a gymnasium.
 - b. There is a shopping mall near K806 and there are other factors that negatively affect student focus in K806.
 - c. K806 lacks accessible water fountains in some parts of the building, such as the cafeteria.
 - d. The lack of accessible water fountains, the foot traffic flow problems in the cafeteria, the narrow hallways, and the small size of the classrooms are examples of the building’s unsuitability.
 - e. While K806 is easily accessible by subway, the traffic on surrounding streets is heavy, which presents safety concerns, especially when middle school students attend school in K806.
 - f. Khalil Gibran students may not be comfortable at K806, and they will not be successful.
 - g. Building K806 does not have a positive learning environment for students; what other locations were considered?
 - h. Can Khalil Gibran parents tour the building?
2. The representative of P.S. 287’s SLT supported the reconfiguration proposal and expressed support for P.S. 287 and Khalil Gibran.
3. A representative of CEC 15 said he has questions about building capacity figures in District 15.
4. A commenter expressed support for P.S. 287 and Khalil Gibran.

Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE

5. A commenter said there should be a Building Utilization Plan (“BUP”) accompanying the proposal, as there is with other proposals.
6. A commenter said he had been told by an official from the DOE Office of Space Planning that full-size classrooms are all over 700 sq. ft, though other accounts say the threshold is 500 sq. ft. He asked whether building K806 has classrooms over 700 sq. ft. The varying sizes of rooms lead to confusion on how the DOE is calculating building utilization rates.
7. A commenter asked how many students applied for Khalil Gibran middle school seats this year.
8. A commenter asserted that the location of an Arabic dual language school in a non-Arabic-speaking neighborhood, such as where Khalil Gibran is currently located, would impact the number of students applying and attending the school. But, now that Khalil Gibran will be closer to an Arabic-speaking population by being in K806, wouldn’t the school be able to attract more Arabic speaking students and therefore shouldn’t the

school be given the chance to do that? Will the Arabic-speaking community help recruit Arabic-speaking students to the school?

9. A commenter asked how the co-location would impact SCD.
10. A commenter opposed the reconfiguration proposal for the following reasons:
 - a. The DOE has not supported Khalil Gibran in the past, as exemplified by the controversy surrounding Debbie Almontaser early in Khalil Gibran's existence;
 - b. The principals selected to replace Debbie Almontaser did not speak Arabic, had no community ties, demonstrated no commitment to Khalil Gibran's initial vision, and did not help Khalil Gibran stabilize or improve.
 - c. The DOE and New Visions have not provided Khalil Gibran with needed staff and resources for Khalil Gibran to succeed or implement its vision of providing an Arabic dual language program and integrated study of Arabic culture.
 - d. The DOE did not consult Khalil Gibran's parent community before re-siting it from its original location to K287, which is not accessible by public transportation and is nowhere near the Arab-American community.

The DOE received comments at the Joint Public Hearings that did not directly relate to the proposal and therefore will not be addressed.

- A commenter stated that the DOE should state in writing that P.S. 287 will not be phased out and that any grade reconfiguration proposals submitted by the school will be considered seriously.
- A commenter stated that P.S. 287 should receive more support because it has outperformed other District 13 elementary schools.
- A CEC 15 representative said there should have been a question and answer session at the hearing on April 14, 2011.
- Is MCA's phase-out due to issues with its location or its student make-up? Why is MCA phasing out?

**Analysis of Issues Raised, Significant Alternatives Proposed
and Changes Made to the Proposal**

- Comments 1(a), 1(c), and 1(d) are related to the facilities in building K806. While building K806 is not equipped with a traditional cafeteria or auditorium, a double classroom space on the first floor serves as a cafeteria and an auditorium. It should also be noted that, over the last ten years, the DOE has made several facilities upgrades to the building, which have included: window and boiler plant replacements; construction of a high school science laboratory; upgrades to bathrooms; and construction of a fitness center. The DOE is not aware of any environmental violations at building K806.
- Comments 1(b) and 1(e) relate to the neighborhood surrounding building K806. Comment 1(f) states that Khalil Gibran students may be uncomfortable in Building K806. Building K806 is accessible by the 2, 3, 4, and 5 trains, and it is approximately 0.2 mile away from the nearest subway station. In contrast, building K287 is approximately 0.5 mile away from the nearest F train station and approximately 0.8 mile away from the nearest A and C train station. School administrators and staff are responsible for creating and maintaining productive learning environments in their school buildings, regardless of whether a school is

near a shopping complex. It should also be noted that only Khalil Gibran's eighth grade class in 2012-2013 will be re-sited to building K806. In the future, only high school students at Khalil Gibran would be sited in K806.

- Comment 1(g) questions what alternative locations were considered for this proposal. The Preliminary 2010-2011 Under-Utilized Space Memorandum and List was published on the DOE's website on October 8, 2010, and an updated list was published on February 17, 2011. The Under-Utilized Space Memorandum and List denoted the under-utilized buildings in District 13 and other districts throughout the City. The DOE considered all buildings that were included in that list and the addendum list that was published on the DOE's website on January 11, 2011. Specifically, the DOE considered, amongst other buildings, building K458, which currently houses Brooklyn Academy High School and Bedford Stuyvesant Preparatory High School, and building K460, which currently houses the Secondary School for Law, the Secondary School for Journalism, and the Secondary School for Research. Building K458 was not a viable location because the DOE has proposed to site Brooklyn City Prep Charter School there, while building K460 was not a viable location because the DOE has proposed to site Millennium Brooklyn High School there. Building K806 was considered an appropriate building where Khalil Gibran could be re-sited because it is conveniently accessible via public transportation and because it would be under-utilized after MCA phased out.
- Comment 1(h) questioned whether parents could tour the building. The decision to allow parents to tour the building will be made at the principal's discretion and would likely happen after the school is officially re-sited to K806.
- Comments 2 and 4 are in support of the co-location proposal and therefore do not require a response.
- Comments 3 and 6 relate to building capacity and utilization. Detailed information about the capacity, enrollment and utilization of every building is available in the Enrollment, Capacity, Utilization Report (the "Blue Book"), which is available at http://source.nycsca.org/pdf/capitalplan/2009-10/BB_2009_2010.pdf, and which guides decision-making about a proposed co-location.

As described in the EIS, a building's target utilization rate is calculated by dividing the aggregated enrollment of all the school organizations in the building by the aggregated "target capacities" of those organizations. Each school organization's "target capacity" is calculated based upon the scheduled use of individual rooms as reported by principals during an annual facilities survey, the DOE's goal classroom capacities (which are aspirational targets lower than the UFT contractual class sizes and differ depending on grade level), and the efficiency with which classrooms are programmed (i.e., the frequency with which classes are scheduled in a given classroom).

In addition, the DOE considers anything equal to or greater than 500 square feet to be a full-size room. Thus, there are approximately 21 full-size spaces in Building K806 and the commenter who suggested that full size rooms must be 700 square feet is incorrect.

- In response to comment 5, the DOE only issues Building Utilizations Plans when a

charter school is co-located in a DOE facility. But, in situations such as this, where one DOE school is co-located with another school, the DOE has included information related to the usage of space in the building based on the Instructional Footprint under Section B of the EIS. The DOE uses the Instructional Footprint to set forth the baseline number of rooms that should be allocated to a school based on the grade levels served by the school and number of classes per grade. In addition, information regarding shared space and resources is also outlined in the EIS.

- In response to comment 7, Khalil Gibran received approximately 19.31 applications per seat for entry to sixth grade in September 2010-2011. However, only 18% of the applicants ranked the school among their top three choices. This resulted in an extremely low number of students matched to the school for the 2010-2011 school year.
- In response to comment 8, as stated in the EIS, the DOE, in conjunction with New Visions for Public Schools and the school community, determined that truncating the middle school grades at Khalil Gibran and restructuring the school to serve ninth through twelfth grades only would optimize student learning outcomes.
- With respect to comment 9, Brooklyn School for Career Development (75K753) will continue to operate in building K806 and will not lose any space or reduce services as a result of the proposed co-location.
- Comment 10(a-d) relate to the supports that the DOE has provided to Khalil Gibran in the past.

Regarding comment 10(a), in August 2007, Ms. Almontaser stated that she resigned as principal from Khalil Gibran International Academy to protect the stability of the school and to give it “the full opportunity to flourish.” Former Chancellor Joel Klein agreed with her decision, accepted her resignation, and considered the matter closed. Neither the Mayor's office nor the DOE threatened to close the school unless Ms. Almontaser agreed to resign. Preserving Khalil Gibran has been the DOE's priority throughout.

Comment 10(b) stated that the principals who were selected to replace Debbie Almontaser did not speak Arabic, lacked community ties, demonstrated no commitment to Khalil Gibran's mission, and did not help Khalil Gibran stabilize or improve. The first interim acting principal, Danielle Salzberg, was intimately involved with Khalil Gibran's design when she was a member of New Visions for Public Schools' new schools team. The first appointed principal, Holly Reichart, was fluent in Arabic, and she headed New Visions for Public Schools' English Language Arts teacher training network before she was appointed principal of Khalil Gibran. The current principal, Beshir Abdellatif, is also fluent in Arabic, and he is committed to implementing Khalil Gibran's Arabic dual language program.

Comment 10(c) stated that the DOE and New Visions for Public Schools have not provided Khalil Gibran with support. On the contrary, New Visions for Public Schools has made direct financial grants to Khalil Gibran totaling \$400,000 to support all aspects

of the school's program. In addition, New Visions for Public Schools provided weekly leadership development support and monthly leadership coaching to assist the principals in trying to implement the original vision for the school. Other supports include:

Coaching:

- Offering leadership mentoring, training, and coaching for the principal on implementing Arabic dual language instruction.
- Operational management, including budgeting, procurement, programming, ATS training, and recruitment.
- Working with the principal, assistant principal, and a network of data specialists to develop a data system to project and monitor student progress.
- Annual teacher mentoring through The New Teacher Project.
- Offering professional development to teachers in curriculum planning and student engagement.

Student Support:

- Specialized Coordinated Early Intervening Services, special education and reading intervention programs, speech therapy,
- Supporting the principal in creating individual teacher goals, developing a plan-of-action for each teacher, and creating individualized training plans.
- Working with teachers and staff to monitor student behavior issues.

Comment 10(d) stated that the DOE did not consult Khalil Gibran's parent community before re-siting it to building K287. The decision to re-site Khalil Gibran in building K287 was made after consultation with New Visions for Public Schools and the Arab-American Family Support Center. Since siting Khalil Gibran in building K287, New Visions for Public Schools has provided weekly re-siting and advocacy meetings to support to Khalil Gibran through its Leadership Development Facilitators.

Changes Made to the Proposal

No changes have been made to this proposal.