September 2019

Raising the Achievement of English Learners in Providence Public Schools

Report of the Strategic Support Team of the Council of the Great City Schools

COUNCIL OF THE GREAT CITY SCHOOLS

Acknowledgements

The Council of the Great City Schools thanks the many individuals who contributed to this project to improve the academic achievement of English learners in Providence Public Schools. The efforts of these individuals were critical to our ability to present the district with the best possible proposals.

First, we thank Former Superintendent Chris Maher for requesting the review. To ask for an in-depth review of this kind takes courage, openness, and an uncompromising commitment to the city's children. Thank you.

Second, we thank staff members of Providence Public Schools, especially Jennifer Efflandt, who provided all the time, documents, and data that the Council needed in order to do its work. The staff's openness and enthusiasm were critical to our understanding of the challenges the school system faces in educating English learners.

Third, we thank the many individuals who we met during our interviews and school visits. Our only regret is that we were unable to meet with everyone who we know had something valuable to contribute.

Fourth, the Council thanks the team members who took time out of their schedules to join us for the site visits and review of district documents. We especially thank the Boston Public Schools for contributing staff members who generously provided their work *pro bono* to support this effort. The enthusiasm and generosity of districts like Boston serve as another example of how the nation's urban public-school systems are working together to help each other improve and reform.

Finally, I thank Council staff members Gabriela Uro and David Lai, who led the project and drafted this report. Their skills were critical to the success of this effort. Thank you.

Michael Casserly
Executive Director
Council of the Great City Schools

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Raising the Achievement of English Learners in Providence Public Schools

Report of the Strategic Support Team of the Council of the Great City Schools

I. Purposes and Origins of the Project

The purpose of this report is to help improve the academic achievement of English learners (ELs)[1] in Providence Public Schools (PPSD) and to help the district meet the detailed requirements laid out in the Settlement Agreement that PPSD entered with the U.S. Department of Justice (DOJ).[2] Knowing that the Council of the Great City Schools had conducted a comprehensive review of Providence's EL program in 2012, Chris Maher, who was the Providence superintendent in 2018, asked the organization for assistance in recommending ways that the district could come into compliance with DOJ requirements and improve the achievement of the district's ELs.

The Council's 2012 review of EL programs in Providence resulted in an extensive report to then-Superintendent Susan Lusi. The report included in-depth findings and corresponding recommendations across multiple departments of Providence Public Schools. As requested by Superintendent Maher, this second analysis was more narrowly focused on the implementation of remedies proposed in the recent Settlement Agreement with the U.S. Department of Justice that was designed to bring PPSD into compliance with Title VI of the Civil Rights Act. However, the Council also examined broader aspects of the district's overall instructional program and organizational structure to better understand the context in which the district's EL programs operate. The Council, therefore, broadened its view when necessary to better address the requirements of the DOJ Settlement.

The DOJ review called for the district to remedy 12 specific conditions related to proper, timely, and accurate identification of students as English learners and their eligibility for EL services. The conditions included such areas as the lack of systemwide availability of EL services; inadequate monitoring of EL placement to prevent linguistic isolation; inadequate information about EL programs for parents to make informed choices for their children; the lack of equal opportunities for ELs to participate in the district's curriculum; inadequate professional development for teachers and principals on effective instructional practices for ELs; inappropriate exit criteria; and inadequate monitoring of former EL performance.[3] In the settlement agreement, the district does

[1] These students were also referred to as "English Language Learners (ELLs)" and "Limited English Proficient (LEP)" in documents we reviewed. "English learner"—the preferred term in Providence—is primarily used in this report. However, we retain other terms for ease of reference to original sources.

[2] U.S. Department of Justice. (2018, August). *Settlement agreement between the United States and Providence Public Schools*. Retrieved from https://www.justice.gov/opa/press-release/file/1086586/download

[3] On March 28, the U.S. Department of Justice notified Providence Public Schools that a total of 12 conditions had been identified as being in violation of Section 1703(f) of the Equal Education Opportunities Act. Settlement Agreement Between the United States and Providence Public Schools, p.1.

not admit to violations of the EEOA, but it did agree to implement DOJ-specified remedies in order to avoid court action. The district also agreed to outline ways that it would seek to overcome language barriers impeding equal participation by ELs in the district's instructional programs.[4]

Thus, Providence Public Schools requested that the Council assist in developing a multi-year plan to implement the remedies that would bring PPSD into compliance with the 12 listed conditions and would improve overall EL services and achievement.

Overview of the Project

The Council of the Great City Schools responded in October 2018 to a Request for Proposal issued by the City of Providence to conduct a review of instructional programming provided to English learners in Providence Public Schools and to design a multi-year implementation plan to carry out remedies stipulated in the DOJ Settlement Agreement. The Council was awarded the contract in December 2018 to meet the superintendent's request, using the Strategic Support Team process it has developed over two decades. The Council, a coalition of the nation's largest urban school systems, has extensive experience designing and reviewing academic programs in major cities. The group has conducted over 300 organizational, instructional, management, and operational reviews in over 65 big-city school systems over 20 years.

The Council, in turn, assembled a Strategic Support Team of senior instructional and bilingual education leaders from other large urban school systems who have a strong record of raising student achievement among ELs; were familiar with Providence Public Schools; and had experience responding to DOJ-determined remedies. These individuals, along with staff from the Council, conducted a weeklong site visit to Providence Public Schools. The team interviewed scores of individuals, including staff members from the central office and individual schools, and met with parents along with visiting schools and classrooms. The project also included a thorough review of documents from Providence Public Schools, the Rhode Island Department of Education, and documents related to the DOJ Agreement. In addition to documents provided by the district, the Council conducted research to confirm the team's observations and staff-reported information. The Council also supplemented district-provided data with publicly available data from the Rhode Island Department of Education and the U.S. Census Bureau to complete the picture of the district.

Project Goals

Then-superintendent Chris Maher asked the Council of the Great City Schools to examine current EL programming in PPSD to bring the district into DOJ compliance over the next three years. Consequently, the Council paid special attention to the district's instructional, fiscal, and staffing issues in order to improve EL programs in the district, incorporating best practices in EL programming from across the country.

[4] Ibid., p.5

Work of the Strategic Support Team

To conduct its work, the Council of the Great City Schools assembled a team of English language acquisition experts from several member school districts who were familiar with the context of Providence Public Schools and/or who had experience in districts with similar student demographics and were familiar with DOJ protocols and agreements. The team included—

- *Priya Tahiliani*, Assistant Superintendent, Office of ELs, Boston Public Schools
- *Kim Tsai*, Attorney, Boston Public Schools
- *Veronica Gallardo*, former Executive Director of EL Office, Seattle Public Schools
- *Tamara Alsace*, Director of Multilingual Education (retired), Buffalo Public Schools
- *Gabriela Uro*, Director of EL Policy and Research, Council of the Great City Schools
- *David Lai*, Special Projects Manager, Council of the Great City Schools
- *Terry Walter*, Director of Bilingual Education (retired), San Diego Unified School District

The Strategic Support Team visited Providence Public Schools over the course of a week in late February 2019, focusing on priority areas that the superintendent presented to the Council's team. The team also looked for evidence that the district was pursuing integrated approaches to EL instruction, evidence of student engagement and English language development strategies, and high expectations and instructional rigor in EL classes and general education classes where ELs were present. In addition, the team looked for evidence that management, principals, and teachers had a sense of shared responsibility for the success of ELs and used EL data to inform instructional decision-making.

The Council team conducted extensive interviews with central-office staff, school board members, Zone Executive Directors, principals, teachers, and parents. The team visited 14 of the district's schools and approximately 70 classrooms, including sheltered ESL classes, bilingual classes, and inclusion classes with students receiving special education. Each classroom visit was short and may not have reflected a typical day, especially when snowfall resulted in students and teachers being absent.[5] Still, the team felt that it saw a representative sample of instruction for English Learners in the district.

The reader should note that this project did not examine the entire school system or every aspect of the district's instructional program. Instead, we devoted our efforts to looking strictly at practices affecting EL access to English language acquisition services and the district's curriculum and other instructional initiatives affecting their academic attainment, including general education and professional development. In addition, the findings were as of the date of the site visit through the end of the 2018-19 school year. The Council used state data on the 2017-18 school year to conduct the analyses on performance. (Each table indicates applicable dates for each analysis.)

In June 2019, Johns Hopkins University conducted its own review of the district and prepared a report at the request of recently appointed Rhode Island Commissioner of Education Angelica

[5] On the second day of the school visits, unfortunately, attendance was drastically reduced due to overnight snowfall accumulation.

Infante-Green. The Council reviewed the findings of that report and noted that it did not include extensive information on services for ELs, but instead shed light on broader systemic challenges contributing to overall low performance among all but a few students in PPSD.[6] This report by the Council, on the other hand, focuses primarily on the teaching of ELs, but the reader will not find the two reports to be incompatible.

The team's work in Providence followed protocols and procedures fine-tuned by the Council over the past 20 years and used by the organization's Strategic Support Teams to improve student performance. Over these two decades, the Council has conducted over 300 organizational, instructional, management, and operational reviews in over 65 big-city school districts. The reports generated by these reviews are often critical, but they have also been the foundation for improving many urban school systems nationally. In other cases, the reports are complementary and help identify "best practices" for urban school systems to replicate. (Appendix L lists the reviews that the Council has conducted.)

Contents of Report

This report begins with an overview of the project, including general and summary information on the DOJ Settlement Agreement. Chapter II presents a demographic overview of Providence, and the enrollment of Providence Public Schools, focusing on English learners. Chapter III presents EL achievement data as well as overall academic achievement in PPSD. Chapter IV presents findings and recommendations in each of the nine areas examined, and Chapter V presents a brief synopsis of the report and its major themes.

The Council's analysis and recommendations in this report are organized along nine specific areas that are outlined in the DOJ Settlement Agreement. The Council's work, however, goes beyond the DOJ-remedies to make system-related recommendations to address broader challenges, building on the findings and recommendations the Council made in 2012. The team determined—as the Council had in its earlier report—that improving achievement for all ELs in PPSD was greatly dependent on improving the overall instructional program provided across the system. The areas we examined and provided recommendations on include—

A. Vision and Shared Responsibility for ELs
B. Registration: Identification and Placement
C. EL Access to Curriculum and Services
D. Staffing and Professional Development
E. EL Instructional Program Support and Monitoring
F. Family and Community Engagement and Communication
G. English Learners in Special Education
H. EL Data Reporting and DOJ Agreement Compliance
I. Budget and Finance

[6] Johns Hopkins Institute for Education Policy. (2019, July). *Providence Public School District in review*. Johns Hopkins University School of Education.

In Appendix A, we include a table that cross-references the specific DOJ remedies to the relevant nine areas we used to organize our findings and recommendations. Given that our recommendations address systems and systemwide issues, most DOJ-remedies are linked to more than one of the nine areas listed above.

II. Background

Providence plays a major role in many of Rhode Island's largest industries and makes significant contributions to Rhode Island's economy. Table 1 provides data on the economic contributions of the City of Providence to Rhode Island in selected industries during 2012.[7] Indicators available through the 2012 *Economic Census of the United States* include the value of sales (in thousands of dollars) and numbers of employees. For selected industries, about one-fifth (20.2 percent) of all sales, shipments, receipts, revenues, or business done in Rhode Island were conducted by businesses in Providence. For instance, Providence's contributions to health care and social assistance are substantial. Approximately 44 percent of the total value of services in these industries across the state emanate from Providence. Providence is also disproportionately productive in professional, scientific, and technical services, accounting for around a third of all related business conducted in Rhode Island. Finally, a sizable number of jobs in the selected industries are in Providence. Of all employees in the listed industries, 23.3 percent work in Providence. (See Table 1.)

Table 1. Economic Contribution of Providence to Rhode Island in Selected Industries, 2012

	Value of Sales, Shipments, Receipts, Revenue, or Business Done ($1,000)			Number of Employees		
Industry	Providence	Rhode Island	Providence as % of RI	Providence	Rhode Island	Providence as % of RI
Accommodation and food services	$583,982	$2,481,314	23.5%	9,893	44,063	22.5%
Administrative and support and waste management and remediation services	$416,131	$1,601,352	26.0%	6,342	21,201	29.9%
Arts, entertainment, and recreation	$130,759	$780,187	16.8%	1,951	8,798	22.2%
Educational services	$29,451	$124,557	23.6%	625	1,942	32.2%
Health care and social assistance	$3,609,557	$8,223,005	43.9%	28,579	84,067	34.0%
Manufacturing	$628,362	$11,262,158	5.6%	3,165	39,608	8.0%

[7] The data are from the 2012 *Economic Census of the United States*; data from the 2017 Economic Census are forthcoming, but currently unavailable for analysis in this report. Figures include totals for each selected industry (economic sector) rather than disaggregated tax status or type of operation. The selected industries are those for which data are reported for both Providence and Rhode Island. Finance and insurance, information, management of companies, mining, and utilities are among industries excluded from the analysis because they often operate across state lines.

Industry	Value of Sales, Shipments, Receipts, Revenue, or Business Done ($1,000)			Number of Employees		
	Providence	Rhode Island	Providence as % of RI	Providence	Rhode Island	Providence as % of RI
Other services (except public administration)[8]	$492,161	$1,444,599	34.1%	3,455	13,046	26.5%
Professional, scientific, and technical services	$1,109,451	$3,338,161	33.2%	6,387	21,165	30.2%
Real estate and rental and leasing	$227,937	$1,119,783	20.4%	1,126	5,615	20.1%
Retail trade	$1,448,676	$12,063,865	12.0%	6,835	47,688	14.3%
Transportation and warehousing	$118,313	$1,153,478	10.3%	1,124	11,271	10.0%

Source: 2012 Economic Census of the United States

Paradoxically, while Providence plays an outsized role in the economy of Rhode Island, a large percentage of Providence's residents live in poverty, compared to residents across the state. In fact, Providence's residents are two- to three- times more likely to live in poverty than residents of Rhode Island in general. In other words, the very workers who are helping fuel Providence's contribution to the Rhode Island economy are themselves struggling to provide for their families. (See Table 2.)

Table 2. Poverty Indicators for City of Providence and Rhode Island

	City of Providence	Rhode Island
Percentage of Families and People with Incomes below the Poverty Level in Past Year, 2017		
All People	26.9%	13.4%
All Families	22.0%	9.5%
Families with Children Under 18 Years Old	31.2%	16.1%
Native-Born Families with Children Under 18 Years	32.5%	14.5%
Foreign-Born Families with Children Under 18 Years	30.0%	21.9%
Female-Headed Households	39.3%	27.0%
Children Under 18 Years	35.9%	18.5%
Percentage of Students Economically Disadvantaged, SY 2017-18		
Economically Disadvantaged	87.1%	46.7%

Source: 2017 ACS 5-year estimates and Rhode Island Department of Education SY 2017-18 Report Card

[8] "Establishments in this sector are primarily engaged in activities, such as equipment and machinery repairing, promoting or administering religious activities, grantmaking, advocacy, and providing dry-cleaning and laundry services, personal care services, death care services, pet care services, photofinishing services, temporary parking services, and dating services" (2012 *Economic Census of the United States*).

The Council's 2012 EL report on Providence describes the rich history of Rhode Island and Providence and the colorful tapestry of languages one finds in the state and city.[9] Today, the number of those speaking a language other than English at home in Providence is greater than our estimates in 2012. According to the U.S. Census, 50.8 percent of all individuals five years and over now speak a language other than English at home in Providence, and just over half (55 percent) indicate that they speak English "very well." The other half in this age group who speak English less than "very well" include nine language groups, with Spanish being the largest. The language groups that had the highest percent of individuals who speak English "less than very well" included:

- Over half (51.3 percent) of Spanish speakers aged five or over speak English "less than very well,"
- Forty-one percent of Korean speakers aged five or over speak English "less than very well," and
- Forty-one percent of Asian Pacific Islanders aged five or over speak English "less than very well."

In four other language groups, 20 percent of those aged five and over speak English "less than very well." While the Spanish-speaking population is by far the largest, there are at least 4,800 other individuals in Providence who likely need language assistance in English. Ultimately, American Community Survey (ACS) data indicate that there are other languages in addition to Spanish spoken by 13 percent of Providence's residents that should be considered when planning community initiatives.[10]

Providence Public Schools

Providence Public Schools is a politically and financially dependent school district that serves the City of Providence, the capital of Rhode Island. It is the largest department within the City of Providence, accounting for approximately half of the city's operating budget and employing more than 3,200 individuals. Providence Public Schools has had relatively stable leadership for about a decade, unlike the turnover noted in the Council's earlier EL program review.[11] Specifically, Superintendent Tom Brady served from 2008 to 2011; Superintendent Susan Lusi from 2011 to 2015; and Superintendent Chris Maher from 2015 until 2019 (including nine months as interim)—each serving about three years or so, the average of big-city school systems across the country. In comparison, the city has had two mayors since 2010—an important point, since the nine-member school board is appointed by the mayor. Finally, at least three of nine board members have served between five and 10 years, providing the school district with some continuity over the decade. Despite this relative stability, the district has become mired in rather convoluted and

[9] See Appendix A in *Raising the Achievement of English Language Learners in the Providence Schools: Report of the Strategic Support Team of the Council of the Great City Schools at www.cgcs.org/page/631.*

[10] 2017 American Community Survey 1-Year Estimates. C16001 Languages Spoken at Home for the Population 5 Years and Over, Providence.

[11] Council of the Great City Schools. (2012). *Raising the achievement of English language learners in the Providence Schools*. Washington, DC.

inconsistent governance practices that are highly unusual in other major city school systems across the country and have contributed to the downward trajectory of the school system.

In summary, Providence Public Schools serve approximately 24,000 students in 41 schools: 22 elementary, seven middle, ten high schools, and two (district) charter schools. Over 90 percent of PPSD's student body are ethnically and racially diverse—66 percent Hispanic, 16 percent African American, four percent Asian, four percent multi-racial, and one percent Native American. Only nine percent of Providence's students identified themselves as White. About 15 percent of all students are eligible for special education services; 84 percent of students are eligible for free and reduced priced lunch; and 29 percent are English learners.[12] (See Table 3.)

Providence Enrollment Compared to Overall Enrollment in Rhode Island

Compared to Rhode Island's primary and secondary enrollment, students in Providence Public Schools are from more diverse backgrounds than the state overall. Most notably, students in Providence are much less likely to be White and more likely to be Hispanic. White students comprise about nine percent of all students in Providence Public Schools; statewide, White students constitute about 57 percent of all students. In other words, students are about six times less likely to be White if enrolled in Providence than in Rhode Island schools in general. Hispanic enrollment makes up about 66 percent of all students in Providence Public Schools but only 26 percent of students in Rhode Island's schools at large. Moreover, Providence Public Schools enroll nearly 42 percent of all Hispanic students in Rhode Island's schools. Similar patterns also exist among other students from various racial and/or ethnically diverse backgrounds. (See Table 3.)

Though Providence Public Schools educates about a fifth (17 percent) of all students in Rhode Island, it enrolls substantially higher portions of high-needs students. Specifically, schools in Providence enroll higher percentages of students eligible for free- and reduced-price lunch (FRL) and English learners, compared to the state. In Providence Public Schools, FRL students comprise around 84 percent of total students, compared to 47 percent at the state level. In other words, Rhode Island has about half the rate of FRL students that Providence does. Moreover, public schools in Providence are responsible for educating about 30 percent of all FRL students in Rhode Island. An even higher concentration of ELs is enrolled in Providence Public Schools, with over half (51 percent) of all English Learners in Rhode Island attending school in Providence. About 30 percent of students in Providence Public Schools are English learners, compared to less than 10 percent statewide. Consequently, the instructional challenges that Providence Public Schools must address are unique, compared to most school districts in the state. (Table 3.)

[12] Exact figures and percentages may vary depending on sources and dates corresponding to data reports. As relevant, we indicate sources and notes concerning dates in footnotes and captions.

Table 3. Providence Public Schools and Rhode Island Enrollment, SY 2018-19

	Providence (PPSD)		Rhode Island (RIDE)		Comparison	
	Number	Percentage of PPSD	Number	Percentage of RIDE	%-point Difference (PPSD -RIDE)	PPSD as Percentage of RIDE
Native American	231	1.0%	1,095	0.8%	0.2%	21.1%
Asian Pacific	1,063	4.4%	4,953	3.5%	1.0%	21.5%
Black	3,884	16.2%	12,467	8.7%	7.5%	31.2%
White	2,058	8.6%	81,147	56.6%	-48.0%	2.5%
Hispanic	15,705	65.6%	37,507	26.1%	39.4%	41.9%
Multi-Race	1,014	4.2%	6,267	4.4%	-0.1%	16.2%
IEP	3,697	15.4%	22,417	15.6%	-0.2%	16.5%
FRL	20,208	84.4%	67,933	47.4%	37.0%	29.7%
EL	7,036	29.4%	13,678	9.5%	19.8%	51.4%
Total	23,955	100.0%	143,436	100.0%	—	16.7%

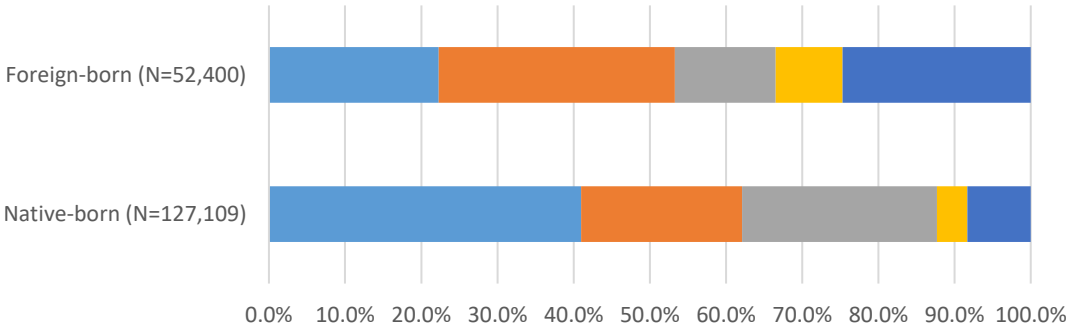
Note: October enrollment counts. Does not include private school or home-schooled students.
Source: Rhode Island Department of Elementary and Secondary Education. (n.d.). Statistical reports. Retrieved June 26, 2019, from http://www.eride.ri.gov/reports/default.asp

Workforce Participation of Providence School Community

For a better understanding of the context in which EL families and children live, the Council examined additional American Community Survey data. Specifically, we looked at occupations in Providence to get a sense of the flexibility that families might have to participate in various school activities. Workers in professional occupations (e.g., management, sales, office occupations, etc.) were presumed to have greater flexibility to handle personal and school matters during traditional business hours. And conversely people on an hourly wage were less likely to have flexibility to participate in school functions.

Figure 1 shows the distribution of occupations among "employed civilians" aged 16 years and over in Providence by nativity. Compared to native-born individuals, foreign-born workers were more likely to work in occupations with less flexible working arrangements. Native-born workers were about twice as likely as foreign-born workers to be in management and sales occupations. Specifically, 66.6 percent of native-born workers were in these occupations, while 35.5 percent of foreign-born workers worked in such occupations. This means that just under two-thirds of foreign-born workers, who were most likely to be parents and guardians of ELs, were likely to have less flexibility to handle school-related matters during Providence Public Schools' traditional business hours.

Figure 1. Occupation of Employed Civilians 16 Years and Over by Nativity in 2017

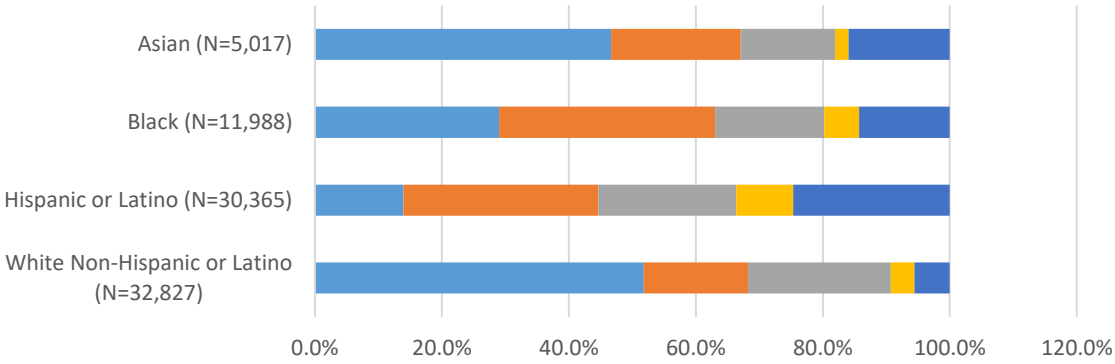


	Native-born (N=127,109)	Foreign-born (N=52,400)
Management, business, science, and arts occupations	41.0%	22.3%
Service occupations	21.1%	31.0%
Sales and office occupations	25.6%	13.2%
Natural resources, construction, and maintenance occupations	4.0%	8.8%
Production, transportation, and material moving occupations	8.3%	24.7%

Source: 2013-2017 American Community Survey 5-Year Estimates

Figure 2 shows the distribution of occupations of "employed civilians" aged 16 years and over by race and ethnicity. Hispanics and African Americans (and Asians to a lesser extent) were more likely to be in occupations that are associated with less flexible work arrangements, like service, construction, and manufacturing. In fact, 64.4 percent of Hispanics or Latinos, 53.8 percent of African Americans, and 38.5 percent of Asians were in these occupations. In addition, 25.7 percent of non-Hispanic or non-Latino Whites were in these occupations as well. Ultimately, over half of Hispanic, Latino, and African American family members may have difficulty interacting with schools during the typical PPSD workday; and over a third of Asian family members may have similar difficulties. Given that students from these ethnically and racially diverse families make up 90 percent of the PPSD enrollment, there is a compelling case to be made for the school system to develop more tailored strategies to more fully engage the parents of these children.

Figure 2. Occupation of Employed Civilians 16 Years and Over by Race and Ethnicity in 2017



	White Non-Hispanic or Latino (N=32,827)	Hispanic or Latino (N=30,365)	Black (N=11,988)	Asian (N=5,017)
Management, business, science, and arts occupations	51.8%	13.9%	29.0%	46.7%
Service occupations	16.4%	30.7%	34.0%	20.4%
Sales and office occupations	22.5%	21.7%	17.2%	14.9%
Natural resources, construction, and maintenance occupations	3.7%	9.0%	5.5%	2.1%
Production, transportation, and material moving occupations	5.6%	24.6%	14.3%	16.0%

Source: 2013-2017 American Community Survey 5-Year Estimates

Providence families value education. Despite economic hardships, the Providence community values and is committed to public education, according to annual state education agency surveys and Council team interviews. Using the *SurveyWorks Stakeholder Survey,* administered by Panorama Education, the Rhode Island Department of Education gathers data on school climate, culture, and school learning environments from students, teachers, support professionals, administrators, and parents.[13] The findings are revealing. For instance, Providence students in grades 3-5 responded favorably on the Spring 2019 survey to items related to *valuing of school* and *school engagement* at about the same rate as students statewide—69 percent and 54 percent, respectively. At the high school level, the percentage of favorable responses on these topics was three percentage points ***higher*** among Providence respondents than respondents statewide.[14] These survey results were like those voiced during team interviews with parents. Education is perceived to be a priority, and parents work to instill the importance of learning in their children. At the same time, the school district is not always perceived as expecting the same achievement from their students as do the parents.

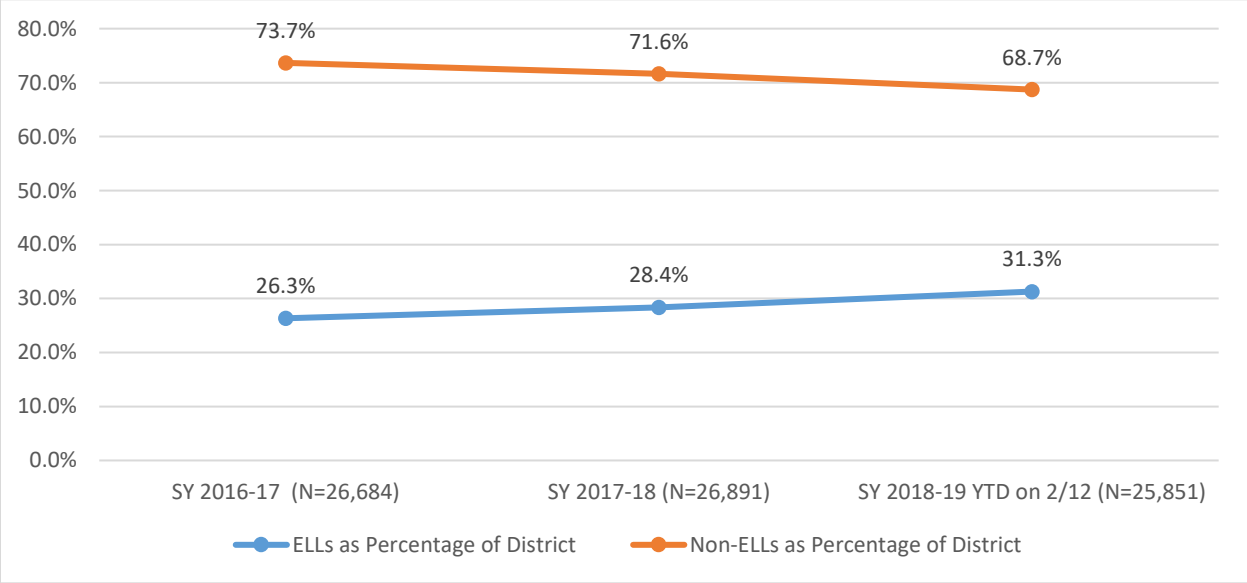
[13] Rhode Island Department of Education. (2019). SurveyWorks resource center. Retrieved July 30, 2019, from https://www.ride.ri.gov/InformationAccountability/RIEducationData/SurveyWorks.aspx

[14] Rhode Island Department of Education, & Panorama Education. (2019). 2019 SurveyWorks results. Retrieved July 30, 2019, from https://secure.panoramaed.com/ride/understand

English Learners in Providence Schools

The Council also examined enrollment trends of ELs in Providence Public Schools over the three-year period between SY 2016-17 and SY 2018-19. Over this period, PPSD experienced a net loss of 833 students.[15] EL enrollments in PPSD, however, grew by 1,060 students (15 percent) over the period, while Non-EL enrollments declined by 1,893 students (9.6 percent). In other words, the increase in EL students has mitigated the overall decrease in districtwide enrollment and is resulting in a shift in the total make-up of the district's enrollment. Specifically, ELs went from comprising 26.3 percent of the district's enrollment in SY 2016-17 to approximately 31.3 percent in SY 2018-19. As the EL enrollment approaches one-third of all students in PPSD, the district faces increasing pressure to provide effective instructional practices for ELs. It also ramps up pressure for the school system to establish supports and accountability to guarantee higher quality education to ELs and all others in the district. (See Figure 3.)

Figure 3. Students as Percentage of PPSD by EL Status, SY 2016-17 to SY 2018-19

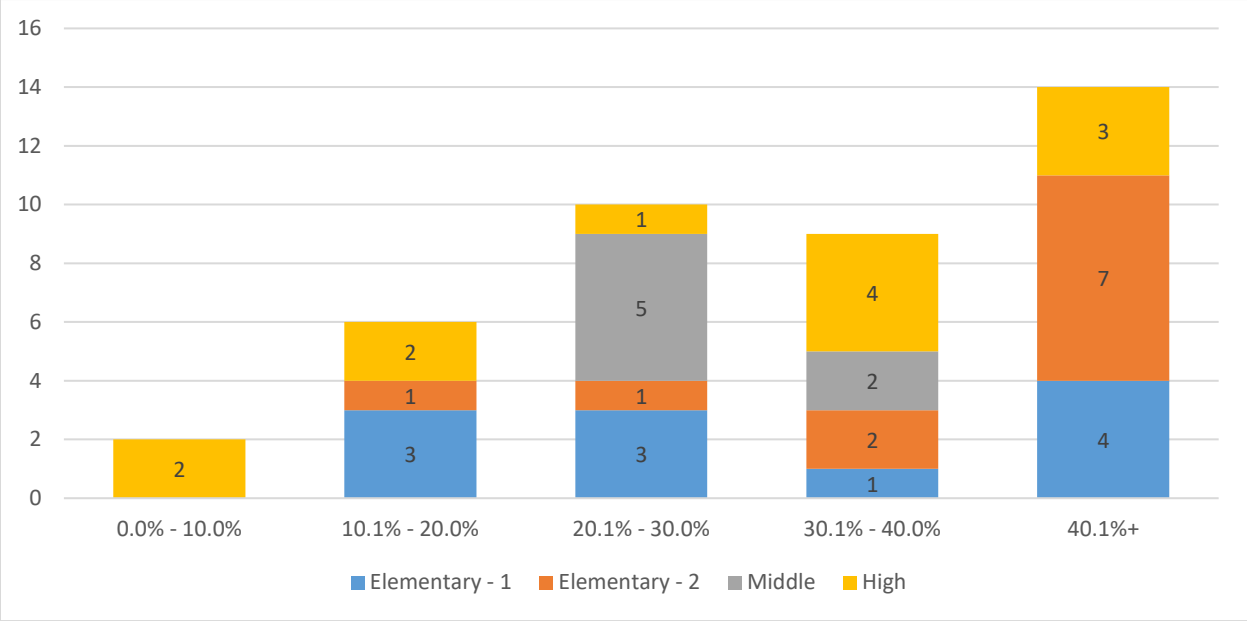


Source: District-submitted data

Of the 41 schools in PPSD on which we have district-provided data, 14 (or 34 percent) had more than 40 percent of their students identified as ELs. Another nine schools (or 22 percent) had an enrollment of between 30.1 and 40 percent ELs. In other words, 23 schools—more than half of all schools in PPSD—had enough ELs enrolled to warrant substantial instructional, staffing, and financial attention. Figure 4 shows the distribution of schools by zone in the percentages of ELs enrolled; only eight schools (less than 20 percent) had EL enrollments that were less than 20 percent of total enrollment.

[15] Enrollment figures for SY 2018-19 are as of February 12, 2019.

Figure 4. Number of Schools by *ELs as Percentage of Total Enrollment* and Zone, SY 2018-19[16]



Source: District-submitted data

The enrollment figures by school over each of three-years are presented in Table 4.[17] These data were used to create the bar chart in Figure 4. The shortened names of the schools are based on the list found on the district's webpage (https://www.providenceschools.org/Page/554). (Appendix C shows enrollment data for additional student groups within each school.)

Table 4. EL Enrollment by Zone and School, SY 2016-17 to SY 2018-19

Sorted by ELs as %-age of School Total within Zone in SY 2018-19

	SY 2016-17			SY 2017-18			SY 2018-19 (YTD as of 2/12/2019)		
	ELs	School Total	ELs as %-age of School Total	ELs	School Total	ELs as %-age of School Total	ELs	School Total	ELs as %-age of School Total
Elementary - 1									
Feinstein at Broad	259	545	47.52%	274	540	50.74%	273	513	53.22%
Spaziano	304	711	42.76%	264	668	39.52%	282	623	45.26%
D'Abate	167	443	37.70%	161	430	37.44%	179	422	42.42%
Feinstein at Sackett	177	508	34.84%	176	487	36.14%	200	482	41.49%
Lima	171	644	26.55%	170	605	28.10%	195	539	36.18%
Fortes	95	413	23.00%	132	428	30.84%	118	439	26.88%
Kennedy	76	527	14.42%	103	531	19.40%	126	518	24.32%
Carnevale	124	612	20.26%	147	624	23.56%	137	600	22.83%
Veazie	107	690	15.51%	108	643	16.80%	108	590	18.31%
Pleasant View	73	513	14.23%	94	527	17.84%	63	484	13.02%

[16] SY 2018-19 as of February 12, 2019

[17] School names are abbreviated. For full school names, see Appendix B.

	SY 2016-17			SY 2017-18			SY 2018-19 (YTD as of 2/12/2019)		
	ELs	School Total	ELs as %-age of School Total	ELs	School Total	ELs as %-age of School Total	ELs	School Total	ELs as %-age of School Total
Gregorian	50	422	11.85%	50	413	12.11%	49	385	12.73%
Elementary - 2									
Leviton	139	299	46.49%	133	292	45.55%	144	282	51.06%
Fogarty	228	531	42.94%	260	549	47.36%	253	516	49.03%
Young & Woods	425	826	51.45%	343	727	47.18%	348	711	48.95%
Webster	118	398	29.65%	137	384	35.68%	163	338	48.22%
Messer	240	630	38.10%	289	631	45.80%	287	599	47.91%
Reservoir	124	324	38.27%	131	323	40.56%	151	317	47.63%
Lauro	370	1,017	36.38%	362	972	37.24%	369	915	40.33%
Kizirian	226	702	32.19%	282	703	40.11%	242	656	36.89%
West	239	934	25.59%	225	855	26.32%	239	795	30.06%
Bailey	92	476	19.33%	98	476	20.59%	99	426	23.24%
King	98	619	15.83%	87	625	13.92%	89	543	16.39%
Middle									
Stuart	249	975	25.54%	275	998	27.56%	343	1,017	33.73%
Williams	220	924	23.81%	260	949	27.40%	276	871	31.69%
DelSesto	222	1,010	21.98%	243	1,041	23.34%	295	991	29.77%
West Broadway	127	589	21.56%	139	538	25.84%	144	507	28.40%
Bishop	110	777	14.16%	187	843	22.18%	184	774	23.77%
Hopkins	116	662	17.52%	131	631	20.76%	146	628	23.25%
Greene	198	1,083	18.28%	198	1,087	18.22%	230	1,064	21.62%
High									
Alvarez	366	695	52.66%	483	842	57.36%	515	872	59.06%
Mount Pleasant	436	1,087	40.11%	483	1,162	41.57%	466	1,034	45.07%
Central	486	1,342	36.21%	543	1,431	37.95%	545	1,330	40.98%
Sanchez	300	741	40.49%	208	565	36.81%	172	472	36.44%
360	52	199	26.13%	89	262	33.97%	93	257	36.19%
Hope	307	1,099	27.93%	335	1,200	27.92%	377	1,139	33.10%
Evolutions	44	211	20.85%	65	232	28.02%	87	282	30.85%
E3 (E-Cubed)	110	460	23.91%	112	458	24.45%	100	417	23.98%
Career & Tech	62	706	8.78%	73	714	10.22%	105	672	15.63%
Times2*	25	229	10.92%	22	214	10.28%	28	215	13.02%
ACE*	57	755	7.55%	56	748	7.49%	71	740	9.59%
Classical	1	1,139	0.09%	4	1,132	0.35%	5	1,090	0.46%
Grand Total									
All Schools	7,390	27,467	26.91%	7,932	27,480	28.86%	8,296	26,065	31.83%

Source: District-submitted data

*Times2 K-12 and ACE are district charter schools.

District Organization

The district is divided into four zones, each led by a Zone Executive Director who is responsible for overseeing schools in that area and evaluating their principals. The team learned that during Superintendent Maher's leadership, regular meetings with Zones Executive Directors and Teaching and Learning considered ELL issues periodically. When ELL issues arose, the EL Office was asked to attend. Most central office staff are located at the district's main office. While the EL team is part of the Teaching and Learning Department that occupies the third floor, the EL Office operates in the basement.

The EL team consisted of a director, an EL census clerk, an office clerk, three screeners, and five specialists who were each assigned to one of the school zones and provided support to programs and assisted with teacher training. More recently, a project manager was hired to assist with the implementation of the DOJ Settlement Agreement. The EL Office did not have any staff dedicated to data analysis, quality control, or the production of numerous reports required by DOJ.

Languages Spoken by ELs

District enrollment data for SY 2018-19 show that English learners in Providence Public Schools speak approximately 45 languages. (See Appendix D.) The data used to create Table 5 was provided in July 2019, yet the files did not have extraction dates. Given that we received the updated data in July, we subsequently labeled the table as SY 2018-19. The reader should note that ELs continue to enroll throughout the school year, and thus, actual EL enrollment figures will differ depending on when the data are extracted.

Spoken by over 80 percent of ELs, Spanish tops the list of EL home languages. Behind Spanish are several languages from Central America (e.g., Quiche, indigenous Latin American languages, Amerindian languages, etc.) and African languages (e.g., Swahili, other African languages, etc.), each spoken by about one percent or fewer of the ELs enrolled in Providence Public Schools. Other parts of the world are represented by speakers of Arabic, Portuguese, Mon-Khmer languages, and Haitian. Overall, 88 percent of all ELs in Providence speak one of 10 language groupings other than English.[18] (See Table 5.)

[18] English was listed as home language (i.e., most frequently used by parents to communicate with children) by 822 ELs. Among ELs who speak English primarily with parents and sibling, based on home language survey responses, 53 percent (438 ELs) initially learned English and 33 percent (268 ELs) initially learned Spanish.

Table 5. Top 10 Home Languages Spoken by ELs Other than English, SY 2018-19

Language	Number of EL Speakers	Percentage of Total ELs
Spanish	6,682	81.2%
Quiche	90	1.1%
Swahili	84	1.0%
Indigenous Latin American Languages	81	1.0%
Arabic	75	0.9%
Portuguese and Portuguese Creoles	72	0.9%
Other African Languages	68	0.8%
Mon-Khmer Languages	43	0.5%
Haitian and Haitian Creole	41	0.5%
Amerindian Languages	15	0.2%
ELs Speaking Top 10 Languages	**7,251**	**88.2%**
Total ELs	**8,225**	**100.0%**

Source: Council analysis of EL student-level data file.

III. Achievement and Outcomes

State Assessments

The Council examined EL achievement data over the most recent three-year period, 2016 to 2018. However, RIDE changed its state assessment from PARCC to RICAS in 2018, so our analysis focuses on performance in 2016 to 2017. Still, our graphs show RICAS results for 2018. Despite the change between 2017 and 2018, the overall ELA and mathematics results demonstrate poor performance by exited ELs, Non-ELs, and ELs—with ELs consistently performing lower than peers in other student groups. (See Figures 5 and 6.)

PARCC Results in 2016 and 2017. Student performance in Providence Public Schools was low on PARCC ELA assessments in 2016 and 2017 across the board, with only one in five (20 percent) exited ELs and Non-ELs, respectively, scoring proficient on each test administration. The percentage of exited ELs who were proficient was slightly lower than the percentage of Non-ELs who were proficient. EL performance saw notable improvements between 2016 and 2017, however, but it remained at very low levels. Only one percent of ELs scored at the proficient level in 2016 and four percent scored at the proficient level on ELA assessments in 2017. (See Figure 6.) The trends are roughly the same in math. In addition, exited ELs and Non-ELs performed similarly, with each group scoring around 18 percent proficient in each test administration. Again, EL performance saw an increase, but overall performance was substantially lower than the two comparison groups. In 2016, fewer than two percent scored at the proficient level, while eight percent of ELs scored at the proficient level the following year. (See Figure 6.)

Figure 5. Students Scoring Proficient on ELA Assessment as Percentage of Subgroup by EL Status

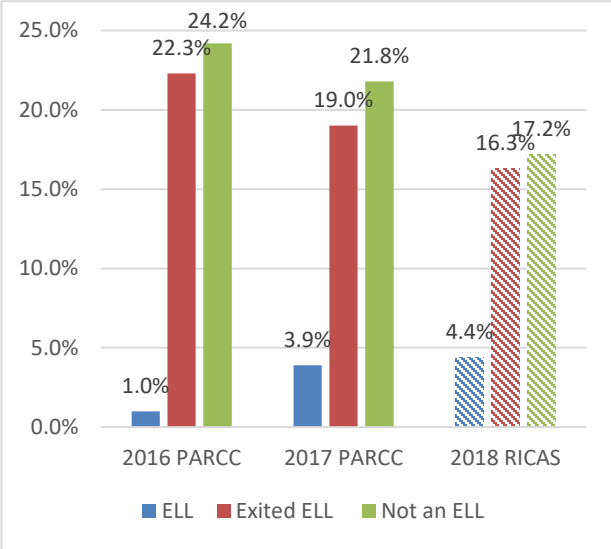
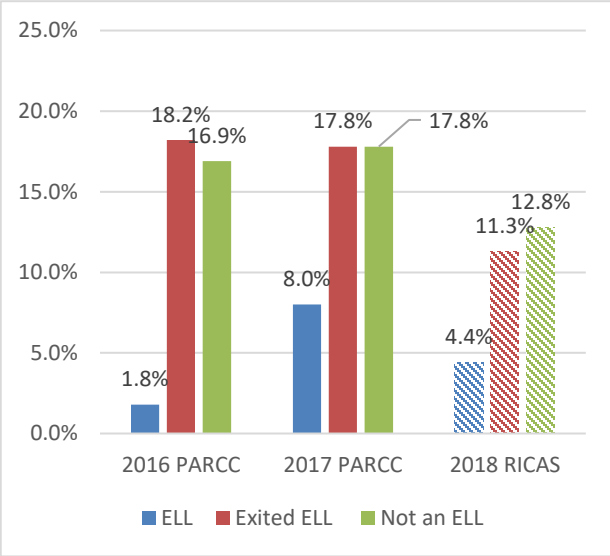


Figure 6. Students Scoring Proficient on Math Assessment as Percentage of Subgroup by EL Status



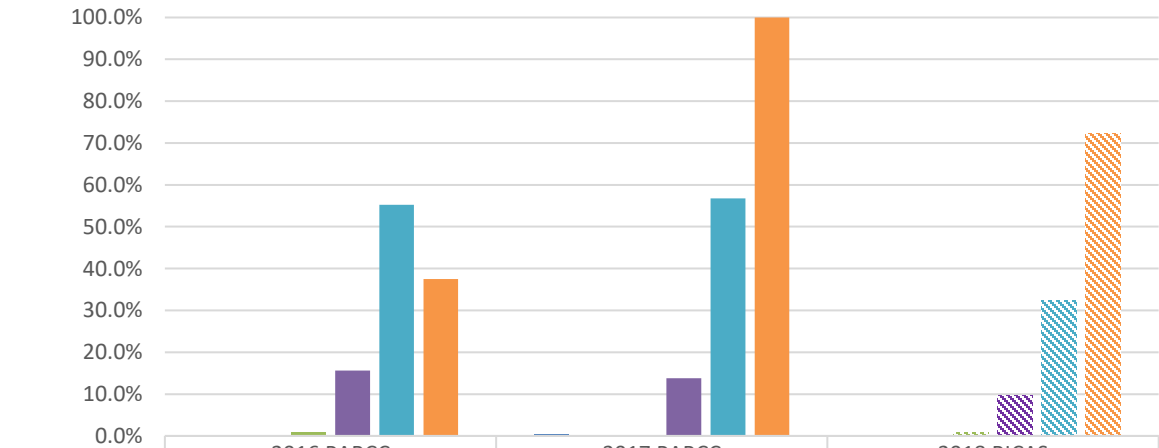
Source: District-submitted data

EL Achievement by English Proficiency Level

The EL group is made up of students who are at various levels of English proficiency and have differing performance on standardized assessments. The Council has generally found that the relative performance of ELs on state assessments, which are typically administered in English, is best examined when disaggregated by differing levels of English proficiency (ELP). As ELs acquire greater English proficiency, they are often better at demonstrating what they know and generally show higher performance on standardized assessments. Doing better on standardized assessments, however, is not solely the function of knowing more English. Rather, it is also a function of having access to grade-level content instruction on what is, ultimately, assessed on standardized tests. Although we were unable to compare performance on the differing assessment instruments (i.e., 2018 on RICAS and 2016-2017 on PARCC), EL performance on RICAS at various proficiency levels mirrored patterns on PARCC.

ELs at Language Proficiency Levels 5 and 6 showed much higher performance on ELA, comparable or higher than Non-EL performance. Figure 7 shows the percentage of ELs who scored proficient on the standardized ELA assessment as a percentage of students at each English proficiency level in 2016 to 2018. Larger portions of ELs at the higher English proficiency levels scored proficient on the standardized ELA assessment. And a greater portion of ELs at Level 5 scored proficient on ELA than ELs at Level 6, which could be a function of ELs having exited the program. (See Figures 7 and 8.)

Figure 7. ELs Scoring Proficient on ELA Assessment by English Language Proficiency, SY 2015-16 to SY 2017-18

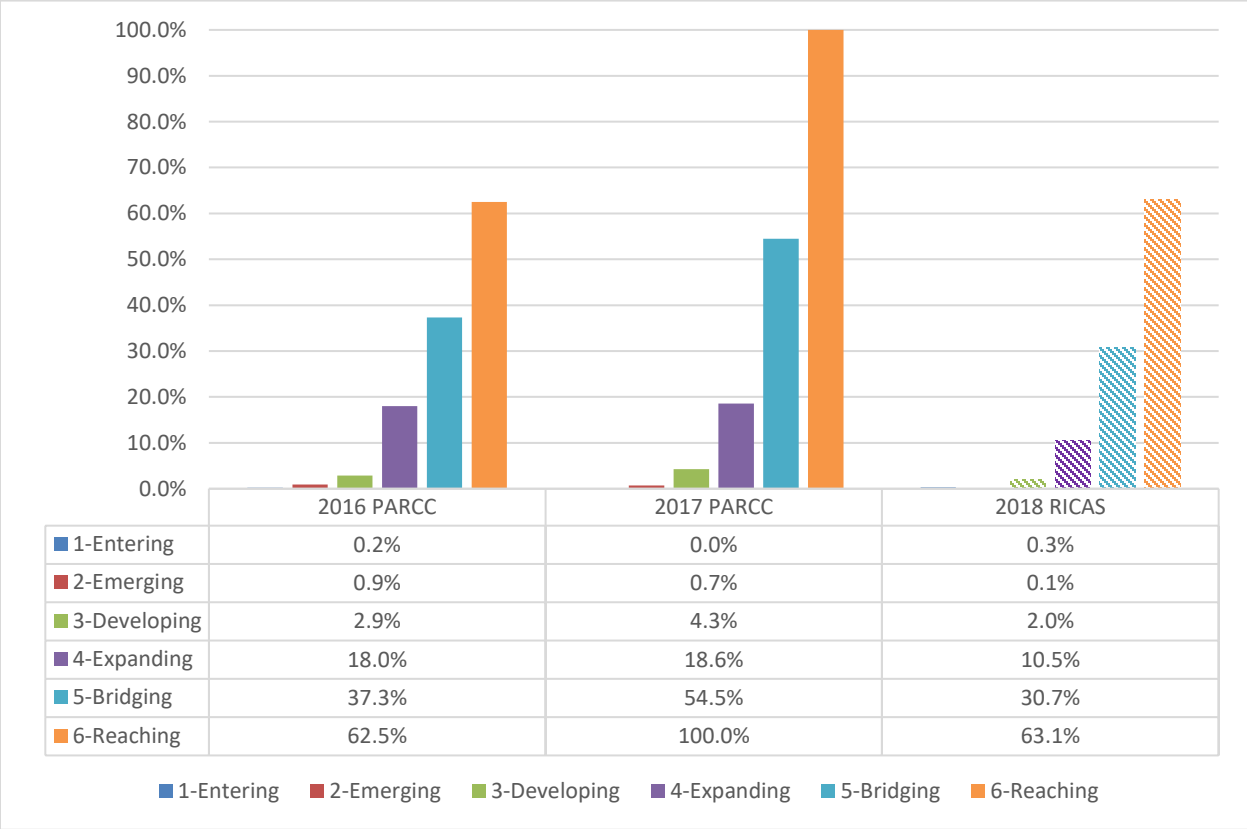


	2016 PARCC	2017 PARCC	2018 RICAS
1-Entering	0.0%	0.3%	0.0%
2-Emerging	0.0%	0.0%	0.2%
3-Developing	0.9%	0.0%	0.9%
4-Expanding	15.6%	13.8%	9.6%
5-Bridging	55.2%	56.8%	32.3%
6-Reaching	37.5%	100.0%	72.3%

Source: District-submitted data

ELs at Levels 5 and 6 showed much higher performance on math, higher than Non-ELs. Even after the change to RICAS in 2018, larger portions of ELs from the higher English proficiency groups demonstrated proficiency on mathematics assessment. Again, it is worth noting that the percentage of ELs at Levels 5 and 6 who scored at proficient levels on the standardized assessment was considerably higher than Non-ELs. For example, 12.8 percent of Non-ELs were proficient in 2018, while 30.7 percent of Level 5 and 63.1 percent of Level 6 ELs scored proficient. (See Figures 7 and 8.)

Figure 8. ELs Scoring Proficient on Math Assessment as Percentage of Subgroup by English Language Proficiency, SY 2015-16 to SY 2017-18



	2016 PARCC	2017 PARCC	2018 RICAS
1-Entering	0.2%	0.0%	0.3%
2-Emerging	0.9%	0.7%	0.1%
3-Developing	2.9%	4.3%	2.0%
4-Expanding	18.0%	18.6%	10.5%
5-Bridging	37.3%	54.5%	30.7%
6-Reaching	62.5%	100.0%	63.1%

Source: District-submitted data

On both state ELA and mathematics assessments, ELs at ELP Levels 5 and 6 performed substantially better than students at lower levels. However, the differences between Levels 4 and Levels 5 or 6 are strikingly large, warranting further examination to understand the impact of whether appropriate accommodations were provided, what the rigor of instruction was, and whether teachers had adequate training in effective strategies for quality EL instruction.

School-level performance was the lowest for ELs in middle schools. The Council also analyzed school-level performance data for SY 2017-18 from the Rhode Island Department of Education.[19]

[19] Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

The data reported on elementary and middle school grades showed performance on RICAS in grades 3 to 8, while the high school data showed performance on the SAT in grade 11.[20] Generally, the percentage of students meeting or exceeding expectations in each student group was lower in middle school, compared to elementary and high schools. In nearly half of the middle schools, no ELs or students with disabilities met or exceeded expectations. Furthermore, ELs consistently performed less well than Non-ELs and students who were not in special education. In some schools, a higher portion of ELs did not meet expectations than students in special education.

In Figures 9 through 16, the Council displays school-level data on student performance on ELA and math by EL status. We also show data by zone. The differences in percentages of ELs not meeting expectations across schools within each zone was large, approaching or exceeding 40-percentage points in several zones.

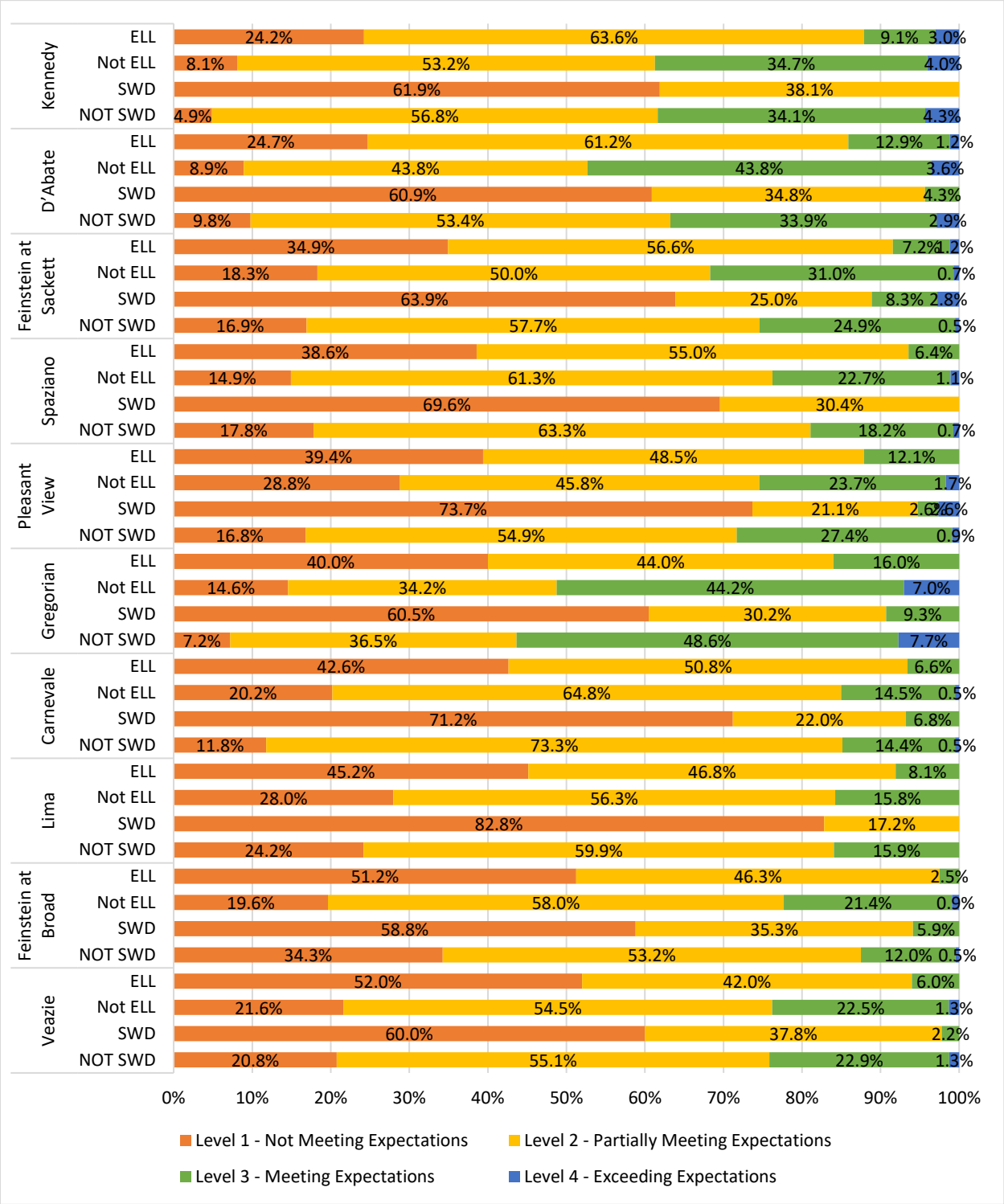
English Language Arts

Figure 9 shows the percentage of students by EL group who scored within each performance level on the state English language arts assessment by school in Elementary Zone 1. The highest portion of ELs (around 76 percent) who at least partially met expectations was at Kennedy, while the lowest portion of ELs (less than half) who at least partially met expectations was at Veazie. At all schools in Elementary Zone 1, the percentage of ELs not meeting expectations was less than the percentage of students in special education not meeting expectations. However, ELs did not perform as well as Non-ELs and students not in special education.

[20] The performance data also include results on the DLM Alternative Assessments administered to students in grades 3-8 and 11 who were assessed using an alternative instrument.

Figure 9. Performance on State ELA Assessment in Elementary-1 Zone by School, SY 2017-18

Sorted by Percentage of ELs Scoring Level 1

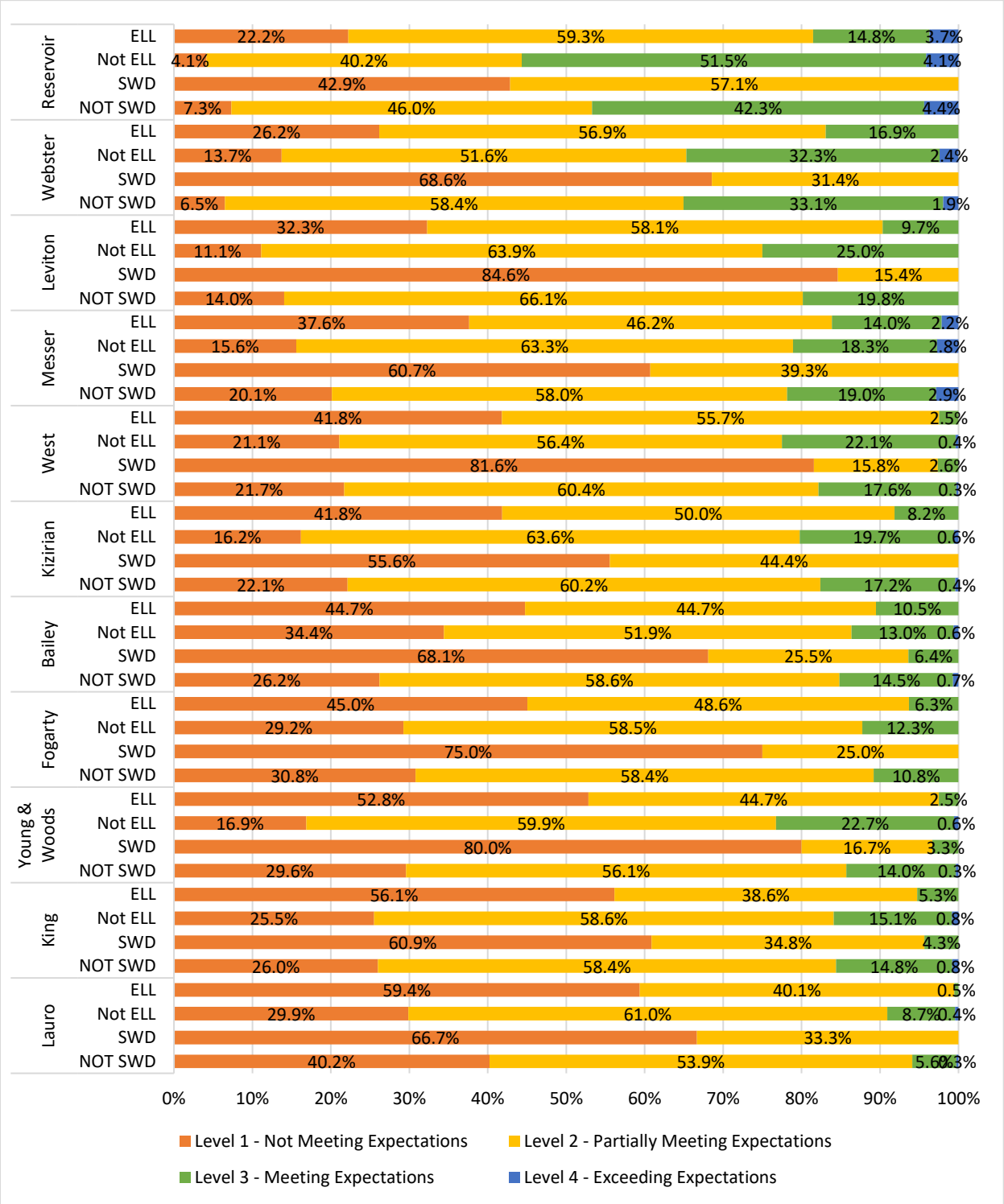


Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Figure 10 shows the percentage of students by EL group who scored within each performance level on the state English language arts assessment by school in Elementary Zone 2. The highest portion of ELs (around 78 percent) who at least partially met expectations was at Reservoir, while the lowest portion (41 percent) of ELs who at least partially met expectations was at Lauro. At King and Lauro, ELs and students in special education had similar performance levels, with well over half of each group not meeting expectations.

Figure 10. Performance on State ELA Assessment in Elementary-2 Zone by School, SY 2017-18

Sorted by Percentage of ELs Scoring Level 1

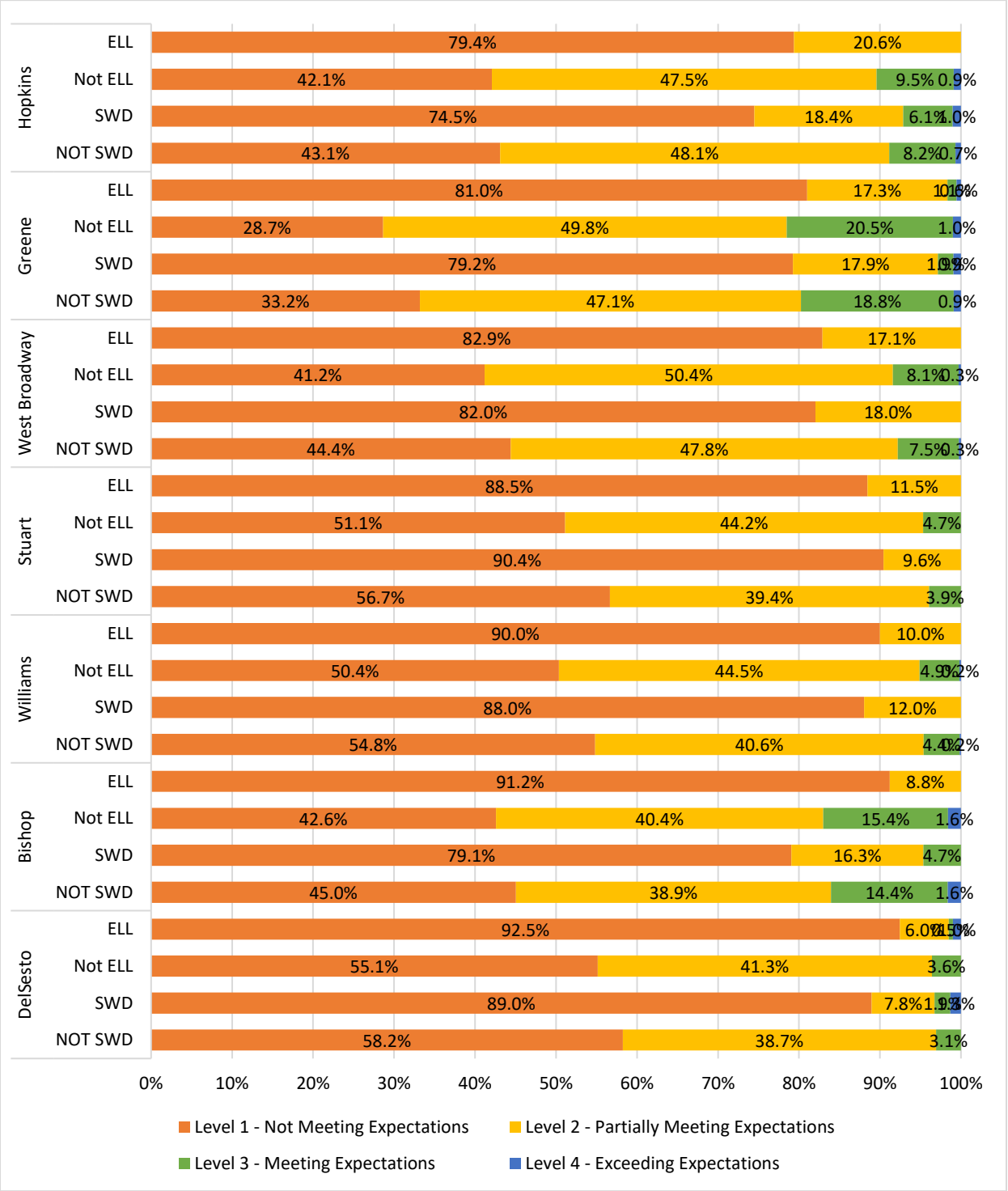


Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Figure 11 shows the percentage of students by EL group who scored within each performance level on the state English language arts assessment by school in the middle school zone. The highest portion of ELs (around 21 percent) who at least partially met expectations was at Hopkins, while the lowest portion (eight percent) of ELs who at least partially met expectations was at DelSesto. In most middle schools, ELs and students in special education had similar performance levels. However, at Hopkins and Bishop, some students in special education met expectations, while all ELs either did not meet expectations or only partially met expectations.

Figure 11. Performance on State ELA Assessment in Middle School Zone by School, SY 2017-18

Sorted by Percentage of ELs Scoring Level 1

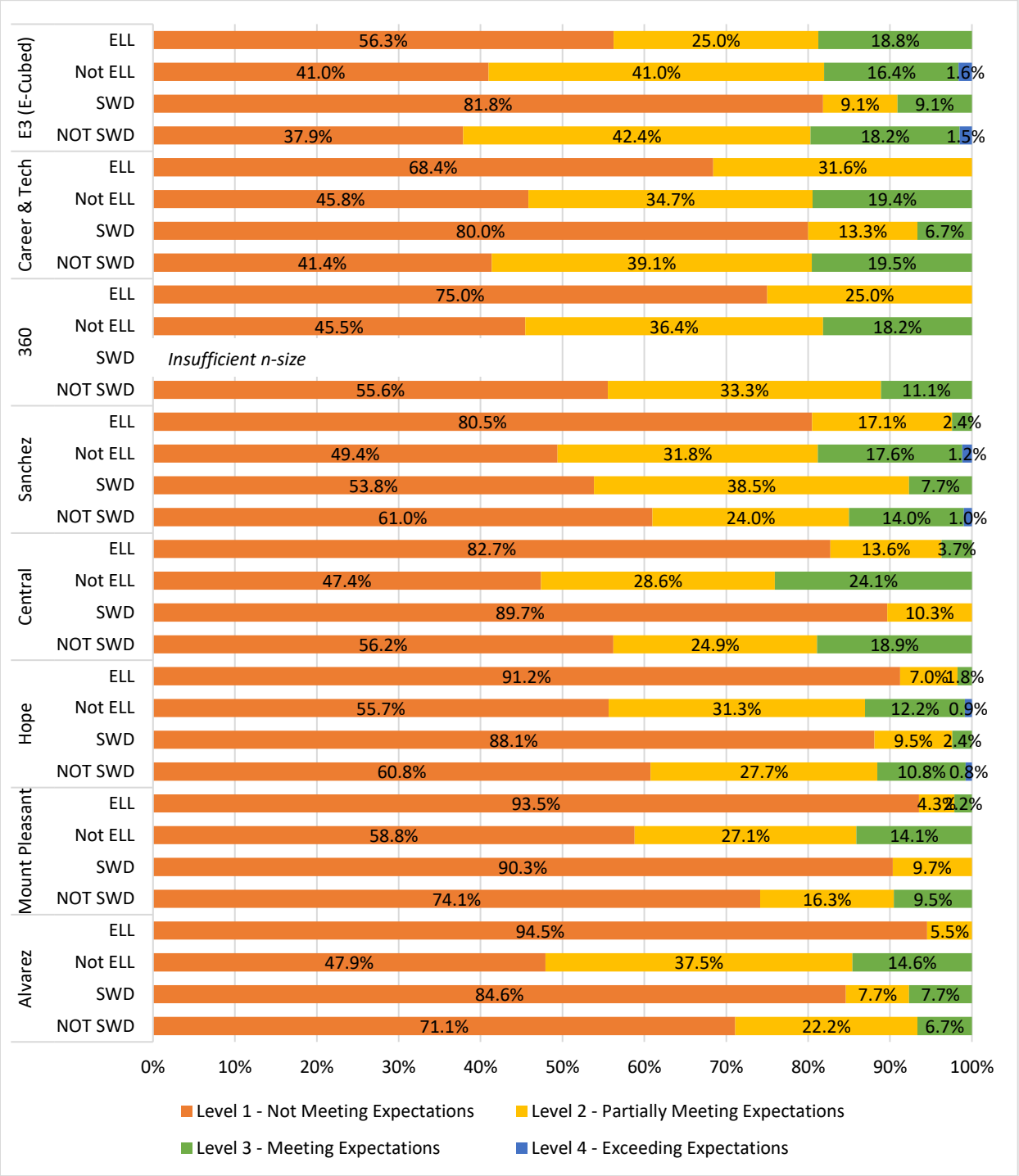


Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Figure 12 shows the percentage of students by EL group who scored within each performance level on the state English language arts assessment by school in the high school zone. The highest portion of ELs (around 44 percent) who at least partially met expectations was at E-Cubed, while the lowest portion (around 6 percent) of ELs who at least partially met expectations was at Alvarez. Overall, the distribution of scores for ELs and students with disabilities was similar.

Figure 12. Performance on State ELA Assessment in High School Zone by School, SY 2017-18

Sorted by Percentage of ELs Scoring Level 1

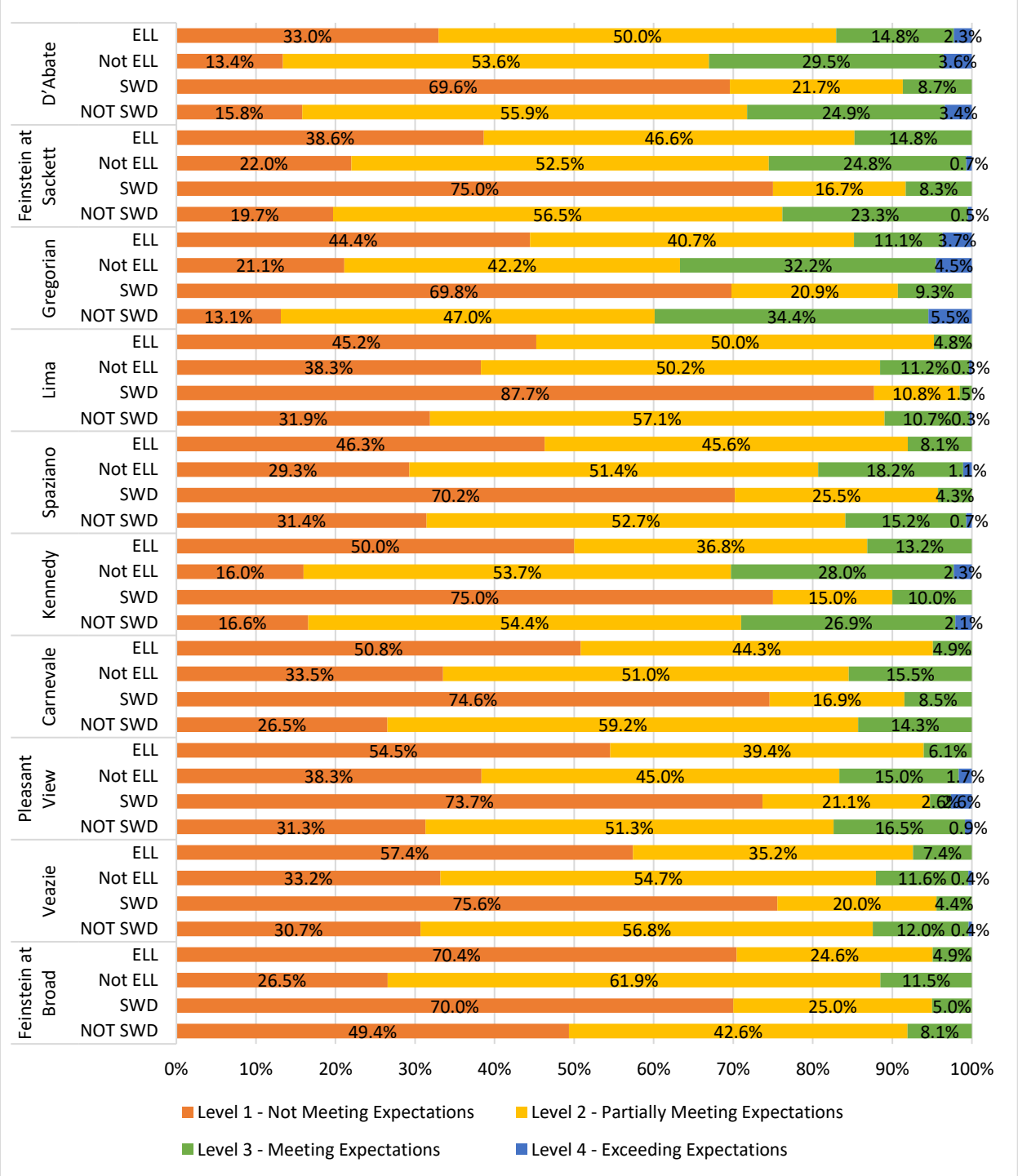


Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher. ACE, Classical, and Evolutions are excluded due to insufficient EL enrollment for accountability reporting.

Mathematics

Figure 13 shows the percentage of students by EL group who scored within each performance level on the state mathematics assessment by school in Elementary Zone 1. The highest portion of ELs (67 percent) who at least partially met expectations was at D'Abate, while the lowest portion of ELs (around 30 percent) who at least partially met expectations was at Feinstein at Broad. In most schools, the percentage of ELs not meeting expectations was lower than the percentage on students in special education not meeting expectations.

Figure 13. Performance on State Math Assessment in Elementary-1 Zone by School, SY 2017-18
Sorted by Percentage of ELs Scoring Level 1

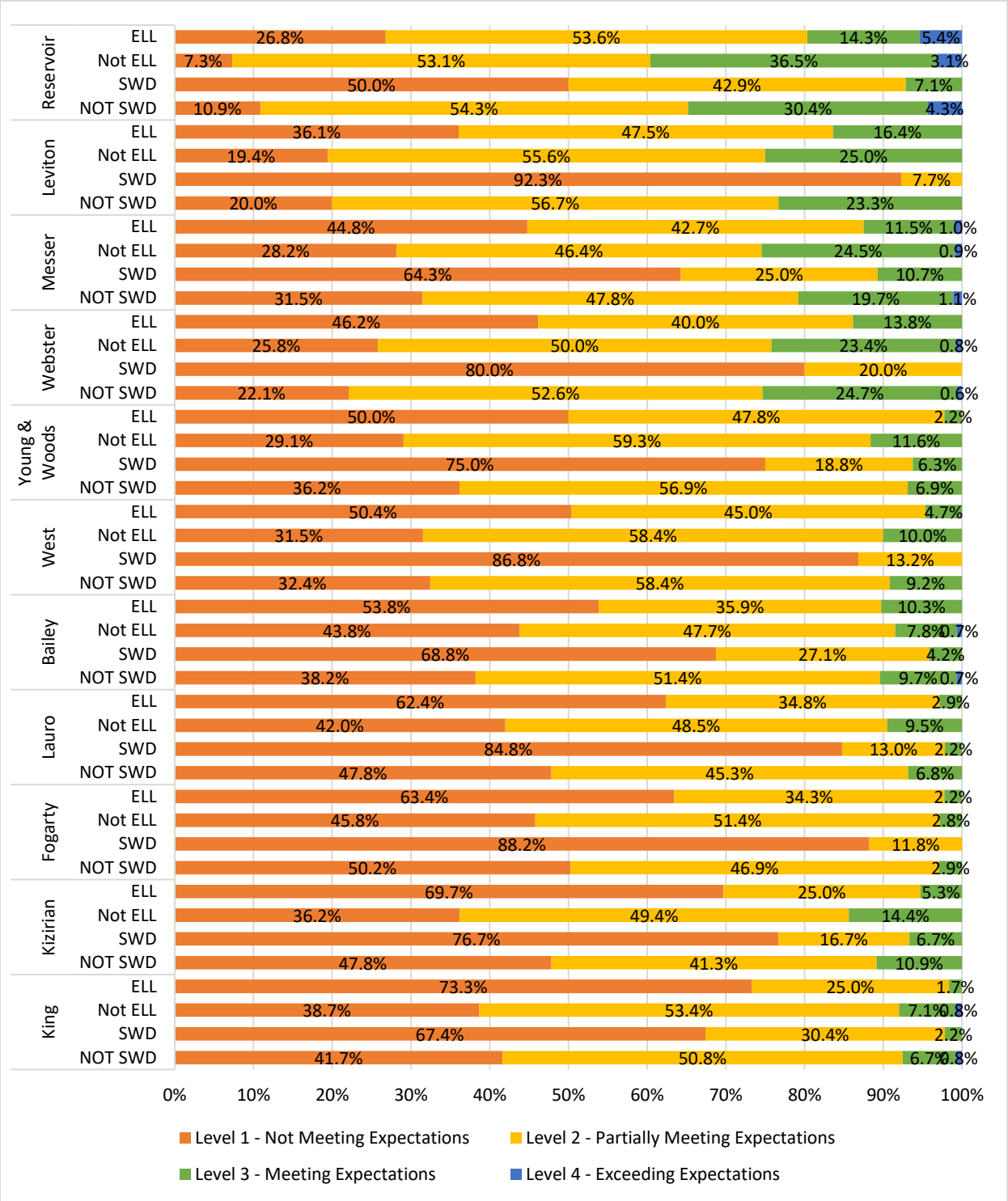


Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Figure 14 shows the percentage of students by EL group who scored within each performance level on the state mathematics assessment by school in Elementary Zone 2. The highest portion of ELs (around 73 percent) who at least partially met expectations was at Reservoir, while the lowest portion of ELs (around 27 percent) who at least partially met expectations was at King. In most schools, the percentage of ELs not meeting expectations was lower than the percentage on students in special education not meeting expectations.

Figure 14. Performance on State Math Assessment in Elementary-2 Zone by School, SY 2017-18

Sorted by Percentage of ELs Scoring Level 1



Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Figure 15 shows the percentage of students by EL group who scored within each performance level on the state mathematics assessment by school in the middle school zone. The highest portion of ELs (around 31 percent) who at least partially met expectations was at Greene, while the lowest portion of ELs (around 13 percent) who at least partially met expectations was at West Broadway. The distribution of scores between ELs and students in special education was similar in most schools. The performance across middle schools seemed the least varied but had the highest percentage of students across all groups not meeting expectations.

Figure 15. Performance on State Math Assessment in Middle School Zone by School, SY 2017-18

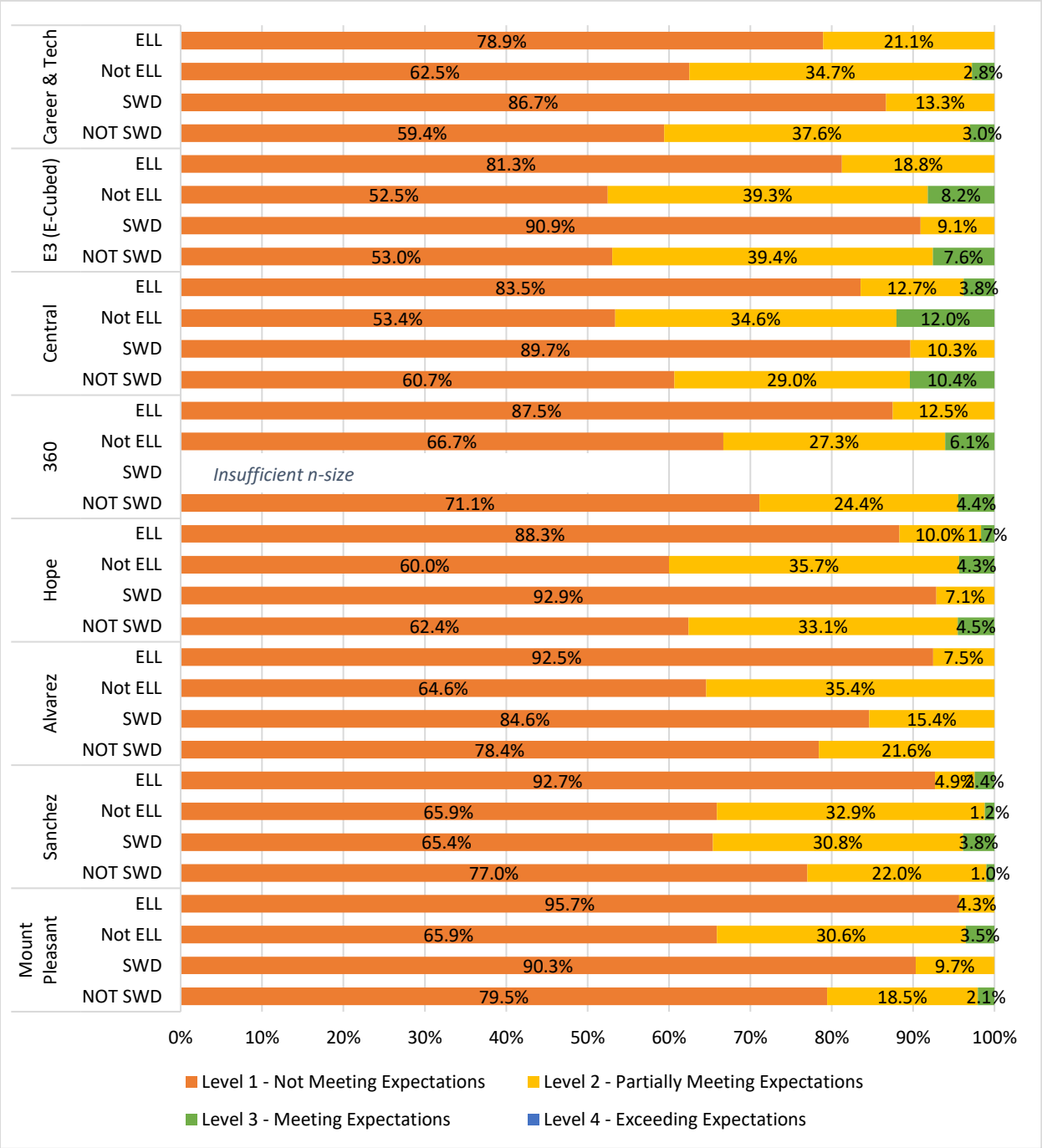
Sorted by Percentage of ELs Scoring Level 1

Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Figure 16 shows the percentage of students by EL group who scored within each performance level on the state mathematics assessment by school in the high school zone. The highest portion of ELs (around 21 percent) who at least partially met expectations was at Career & Tech, while the lowest portion of ELs (around four percent) was at least partially met expectations was at Mount Pleasant. The distribution of scores between ELs and students in special education was similar in most schools. The math performance at the high school level showed the highest percent of all students not meeting expectations.

Figure 16. Performance on State Math Assessment in High School Zone by School, SY 2017-18

Sorted by Percentage of ELs Scoring Level 1

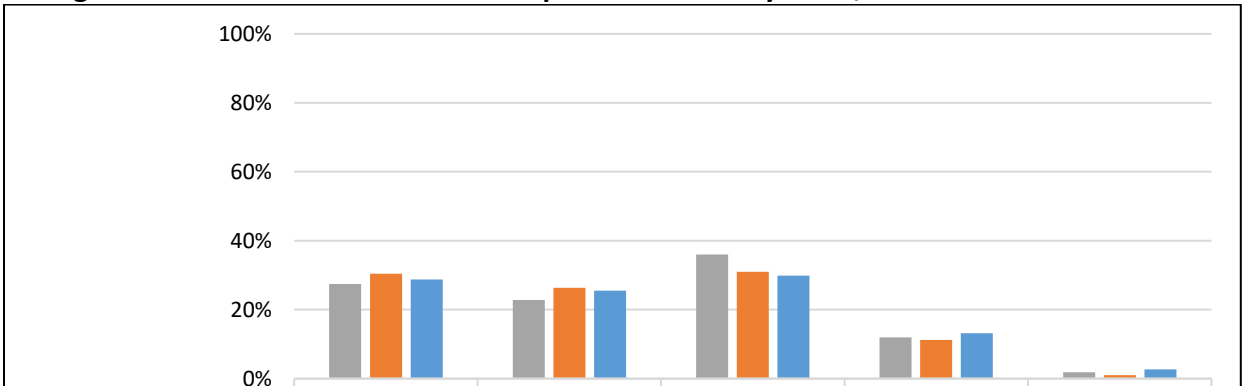


Source: Council analysis of Rhode Island Department of Education data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher. ACE, Classical, and Evolutions are excluded due to insufficient EL enrollment for accountability reporting.

English Proficiency

In this section, we examine district-provided scores on WIDA ACCESS, the state English proficiency assessment, over a three-year period. ACCESS is administered annually between January and March to every EL in the state to measure their English proficiency levels along four domains—listening, speaking, reading and writing. The domains are sometimes combined to provide other measures, such as comprehension, or a composite score used for exiting ELs. An examination of composite scores for ELs in Providence Public Schools provides a picture of the make-up of ELs in the district (i.e., what percentages were at each of the English proficiency levels). The Council's analysis showed that the distribution of composite ACCESS scores had remained relatively stable between SY 2015-16 and SY 2017-18. In each year, roughly a quarter of ELs scored at Levels 1 and 2, respectively. About a third of students were at Level 3. Finally, around 12 percent of ELs scored at Level 4. The percentage of students at Levels 5 or 6—the proficiency level roughly needed for reclassification[21, 22]—hovered around two percent each year. The year-to-year changes were greatest at Level 3, where the percentage of students scoring at that level fell six percent between SY 2015-16 and SY 2017-18. (See Figure 17.)

Figure 17. Overall WIDA ACCESS Composite Proficiency Level, SY 2015-16 to SY 2017-18



	Level 1	Level 2	Level 3	Level 4	Level 5+
SY 2015-16 (N=5,724)	27%	23%	36%	12%	2%
SY 2016-17 (N=5,932)	30%	26%	31%	11%	1%
SY 2017-18 (N=6,671)	29%	25%	30%	13%	3%

Source: District-provided data

[21] During SY 2018-19, the exit criteria included components beyond ELP assessment performance. The WIDA ACCESS 2.0 component of criteria required students to have a literacy composite score of at least 4.5, a comprehension composite score of at least 5.0, and a speaking proficiency level above a district-established minimum. Sienko, J. D., & Lynch, P. (2018, May 14). *State-defined required English language instructional program exit criteria*. Retrieved from https://www.ride.ri.gov/Portals/0/Uploads/Documents/Students-and-Families-Great-Schools/English-Language-Learners/EL%20Exit%20Criteria%20Letter%205.2018.pdf.

[22] In March of 2019, revised exit criteria for SY 2019-20 were announced. Students who are assessed for ELP using WIDA ACCESS 2.0 must score 4.8 or above to be considered for reclassification. Sienko, J. D., & Lynch, P. (2019, March 29). *State-defined required English language instructional program exit criteria*. Retrieved from https://www.ride.ri.gov/Portals/0/Uploads/Documents/OSCAS/English-Learner-Pages/State-of-RI-EL-Exit-Criteria-2019.pdf.

EL experts and linguists often debate the amount of time it takes for a student to become English proficient. With the adoption of college- and career-readiness standards, some in the field have expanded the estimated time to proficiency to beyond seven years. However, there is no robust, large-scale research that supports adding years to this process, but there is an urgent need to improve the instruction that ELs receive to ensure there are no delays in providing access to grade-level content and the academic language needed to engage with that content.[23] Consequently, the Council examined PPSD-provided WIDA ACCESS composite scores to determine the relative English proficiency of ELs who have been in the program for varying lengths of time to see if trends emerged. Figure 18 shows the distribution of WIDA ACCESS composite scores across English proficiency levels in 2018 by years in an EL program.

Long-term ELs. ELs who have been in a language program for three to 4.9 years or five to 6.9 years showed similar proficiency levels, signaling the need for more differentiated language development and grade-level content learning for students at each level, lest they become long-term ELs. This finding is further underscored by the large percentage of ELs who are at Level 3 after being in the program for 7 to 8.9 years and 9 or more years.[24] For these students, there is a clear need for greater acceleration and more appropriate supports *via* MTSS or special education.

Additional observations of ELP versus time in a language program follow—

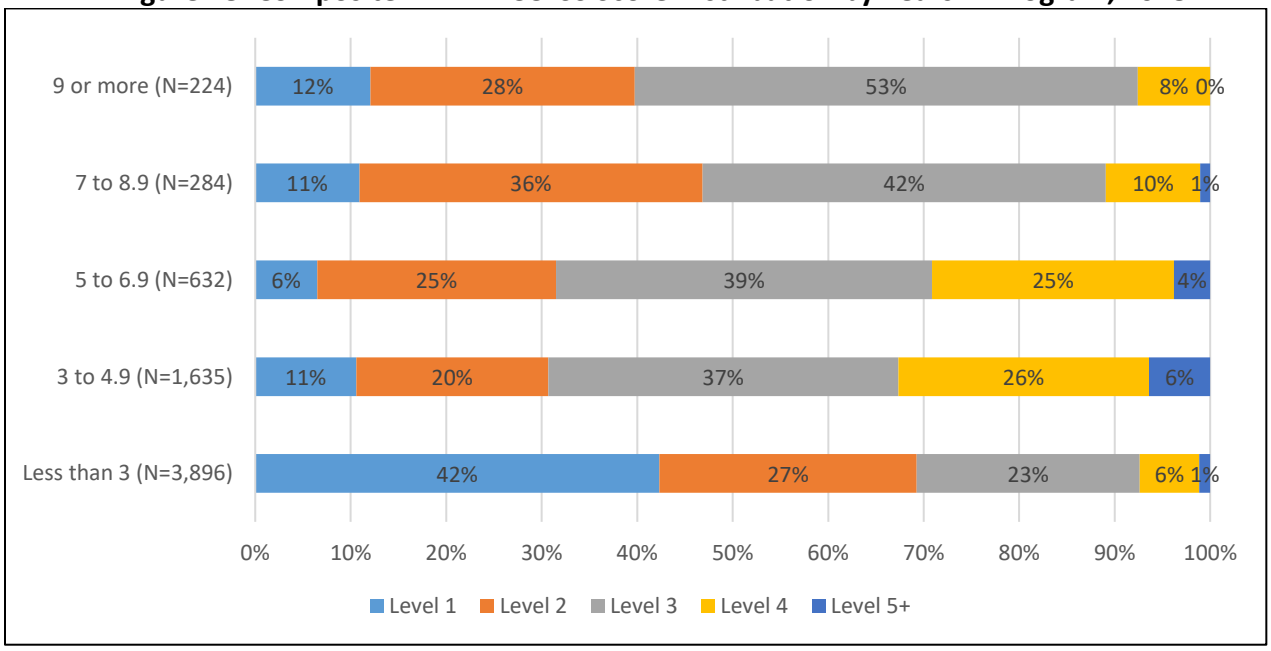
- ***Less than three years.*** ELs who have been in an EL program for less than three years are predominantly at the lower levels of proficiency—Levels 1 and 2—specifically, about 70 percent. Less than one-third (29 percent) of ELs in the program for less than three years are at Levels 3 or 4—nearing the requisite scores for reclassification.
- ***Three to 4.9 years.*** ELs who have participated in a language program for three to 4.9 years mostly score at Levels 3 and 4. In 2018, around 63 percent of these ELs had composite scores in the Level 3 and 4 range. One possible explanation for the lower percentages of ELs at level 5 is that ELs have reached proficiency and have exited the program.
- ***Five to 6.9 years.*** The English proficiency of ELs who have participated in a language program for five to 6.9 years is like that of ELs in a language program from three to 4.9 years. Almost two-thirds (64 percent) of these students scored at Level 3 or 4, and a quarter (25 percent) were at Level 4. Compared to ELs in program from three to 4.9 years, the percentage of ELs in program from five to 6.9 years is slightly lower at Levels 4 and 5+. Again, this could be due to the attrition of ELs who attain English proficiency over time.
- ***Seven or more years.*** The performance of ELs in program seven to 8.9 years and more than nine years shows that most students in both groups scored Level 3, a troubling sign. Among ELs in program seven to 8.9 years, around two-fifths (42 percent) scored at this

[23] For a description of the theory of practice that elevates rigor and expectations for ELs, see *Re-envisioning English Language Arts and English Language Development of ELs* at https://www.cgcs.org/Page/631.

[24] The reader should interpret data on time in program with caution because staff interviews indicated that data may contain errors.

level, while over half (53 percent) ELs in program for nine or more years did. Some 42 percent of students in program for seven to 8.9 years and 53 percent of students in program for nine or more years saw performance that was stalled at the intermediate level of English proficiency (Level 3). In other words, these students were not being equipped with enough academic English to progress, with adverse consequences for content area learning.

Figure 18. Composite WIDA ACCESS Score Distribution by Years in Program, 2018



Source: District-provided data[25]

ELs meeting state exit criteria. We also examined three-year data between 2016 and 2018 on students achieving scores that met the RIDE ACCESS exit criteria[26] by grade to identify trends in exit rates. The overall percentage of students with scores sufficient for reclassification fluctuated greatly from year to year, moving from 11.8 percent in 2016 to 5.0 percent in 2018. In 2017, this percentage dropped to 0.9 percent from 11.8 percent the preceding year, most likely as a result of WIDA's 2016 standard-setting in ACCESS 2.0, which seemed to push a large number of ELs who could exit, to a subsequent grade level. Specifically, in 2016, some 33 and 28 percent of grade 3 and 4 ELs, respectively, scored at the exit criteria level. After the 2016 WIDA standard-setting

[25] These data were provided in response to the original data request, not the student-level supplemental file provided later. While the student-level file included years in program, it did not provide EL program entry and exit dates. Thus, we did not have the means to calculate and verify years in program. The categories used to report proficiency data are the same as those used in the submitted data file.

[26] In SY 2018-19, the exit criteria included components beyond ELP assessment performance. The WIDA ACCESS 2.0 component of criteria required students to have a literacy composite score of at least 4.5, a comprehension composite score of at least 5.0, and a speaking proficiency level above a district-established minimum. Sienko, J. D., & Lynch, P. (2018, May 14). *State-defined required English language instructional program exit criteria*. Retrieved from https://www.ride.ri.gov/Portals/0/Uploads/Documents/Students-and-Families-Great-Schools/English-Language-Learners/EL%20Exit%20Criteria%20Letter%205.2018.pdf.

process,[27] the greatest percentage of ELs reaching exit criteria scores occurred in subsequent grades 4 and 5, as shown in the highlighted cells in Table 6 below. (See Table 6.)

Table 6. ELs Meeting RIDE WIDA ACCESS Exit Criteria by Grade and Year, SY 2015-16 to SY 2017-18

Grade	SY 2015-16			SY 2016-17			SY 2017-18		
	ELs Meeting Criteria	Total ELs	ELs Meeting Criteria as % of Total	ELs Meeting Criteria	Total ELs	ELs Meeting Criteria as % of Total	ELs Meeting Criteria	Total ELs	ELs Meeting Criteria as % of Total
K	4	616	0.6%	2	473	0.4%	0	493	0.0%
1	26	625	4.2%	3	652	0.5%	0	520	0.0%
2	87	713	12.2%	3	676	0.4%	15	693	2.2%
3	217	659	32.9%	15	776	1.9%	59	685	8.6%
4	138	486	28.4%	14	475	2.9%	131	789	16.6%
5	58	366	15.8%	11	401	2.7%	61	510	12.0%
6	12	316	3.8%	0	343	0.0%	7	443	1.6%
7	7	319	2.2%	1	336	0.3%	5	378	1.3%
8	15	385	3.9%	2	358	0.6%	2	410	0.5%
9	44	626	7.0%	1	677	0.1%	11	537	2.0%
10	32	323	9.9%	1	452	0.2%	30	624	4.8%
11	23	216	10.6%	1	307	0.3%	15	429	3.5%
12	22	150	14.7%	0	223	0.0%	6	279	2.2%
Total	**685**	**5,800**	**11.8%**	**54**	**6,149**	**0.9%**	**342**	**6,790**	**5.0%**

Source: District-provided data

ELs meeting exit criteria by years in program. Table 7 shows the percentage of ELs meeting WIDA ACCESS exit criteria in SY 2017-18 by years in program. Overall, the percentage of students meeting the score criteria for reclassification is low no matter the length of time in an EL program. The group with the highest portion of students meeting criteria in SY 2017-18 were students in program for three to 4.9 years. About 12 percent of students in this group attained scores needed for reclassification. All other groups had single-digit rates, with each successive group after three to 4.9 years having decreasing rates of students meeting the exit criteria. Of 1,168 ELs enrolled in SY 2017-18 for more than 5+ years in program, only 66 students or 5.6 percent scored at the exit criteria level. In other words, a large share of the 1,168 ELs still remained in EL programs after five years, having not yet attained English proficiency.

[27] Mitchell, C. (2017). Is a new English-proficiency test too hard? Educators and experts debate. *Education Week*.

Table 7. ELs Meeting RIDE WIDA ACCESS Exit Criteria by Years in Program, SY 2017-18

Years in Program[28]	ELs Meeting RIDE Exit Criteria	Total Els by Years in Program	ELs Meeting RIDE Exit Criteria as % of Total
Less than 3	86	3,971	2.2%
3 to 4.9	190	1,651	11.5%
5 to 6.9	55	644	8.5%
7 to 8.9	7	291	2.4%
9 or more	4	233	1.7%
Total	**342**	**6,790**	**5.0%**

Source: District-provided data

School Status

An important factor shaping EL achievement is the quality of the school in which they are enrolled. Providence Public Schools has most of the state's schools identified in SY 2018-19 by RIDE as requiring Comprehensive School Improvement (CSI) under the federal *Every Student Succeeds Act* (ESSA). According to the state's accountability system—a total of 13 out of 24 identified CSI schools statewide are PPSD schools.[29] Of the 13 Providence schools in CSI status, almost all (12 of 13) have EL enrollments that *make up 20 percent or more* of the school's enrollments. Most CSI schools (7 of 13) have EL enrollments that have *more than 30 percent* of the school's total enrollment. The distribution of CSI schools by grade level is shown in Table 8.

Table 8. ELs as Percentage of Total Enrollment in Comprehensive Support and Improvement Schools (CSI), 2018[30]

Elementary		Middle		High School	
School	**% EL**	**School**	**% EL**	**School**	**% EL**
Bailey	21.5%	Bishop	21.8%	Alvarez	56.4%
King	15.2%	DelSesto	28.6%	Hope	28.5%
Lauro	39.1%	Stuart	31.2%	Mount Pleasant	40.9%
Lima	32.3%	West Broadway	27.4%	Sanchez	35.1%
		Williams	30.5%		

Source: Council analysis of Rhode Island Department of Education October enrollment data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

An additional six schools in PPSD were identified for Targeted Support and Improvement (TSI) because of the underperformance of ELs: West Elementary (with 29.0 percent EL), Gregorian Elementary (with 11.1 percent EL), Leviton Elementary (with 51.7 percent EL), Fortes Elementary (with 25.4 percent EL), E-Cubed (with 24.6 percent EL), and Central High (with 38.7 percent EL).

[28] These are the years in program categories used in the file received from Providence.
[29] Rhode Island Department of Education. (2019). ReportCard. Retrieved August 2, 2019, from https://reportcard.ride.ri.gov/Researcher
[30] Enrollment data are from February 12, 2019.

(See Table 9.) In all but three TSI schools in which ELs were identified as the target group—Fortes, Leviton, and Gregorian—the EL group was also identified as the Additional Targeted Support and Improvement (ATSI) group. Identification as an ATSI group means that at least 20 students would meet the conditions for needing comprehensive support and improvement if it were a standalone school.[31] In sum, the vast majority of ELs—6,834 students or 82 percent of all ELs—in PPSD attend one of 30 schools that are either identified as CSI and/or TSI schools during SY 2018-19,[32] signaling an urgent need to ensure that school improvement plans are designed explicitly to address EL needs. To be sure, those plans need to include improvement to Tier I core instruction for ELs and should not be limited to fragmented intervention programs that are often remedial in nature when it comes to ELs.

Table 9. Schools Identified for Targeted Support and Improvement (TSI) in 2018

Sorted by Zone and Number of TSI Groups in School

School	Hispanic	Black or African American	White	Two or More Races	Asian	IEP	FRL	English Learners
Elementary - 1								
Lima*	✓	✓		✓		✓	✓	✓
Fortes	✓	✓					✓	✓
Gregorian		✓				✓		✓
Feinstein at Broad		✓					✓	
Carnevale			✓			✓		
Feinstein at Sackett						✓		
Pleasant View						✓		
D'Abate						✓		
Elementary - 2								
Lauro*	✓	✓	✓			✓	✓	✓
West		✓	✓			✓	✓	✓
Bailey*	✓	✓				✓	✓	✓
Kizirian	✓					✓	✓	
Leviton	✓							✓
King*		✓					✓	
Messer						✓		
Fogarty						✓		
Young & Woods						✓		
Middle								
Stuart*	✓	✓	✓	✓		✓	✓	✓
DelSesto*	✓	✓	✓	✓		✓	✓	✓

[31] Rhode Island Department of Education. (2019). School improvement. Retrieved August 2, 2019, from https://www.ride.ri.gov/InformationAccountability/Accountability/SchoolImprovement.aspx

[32] Calculated using district provided data as of February 12, 2019. (See Table 4.)

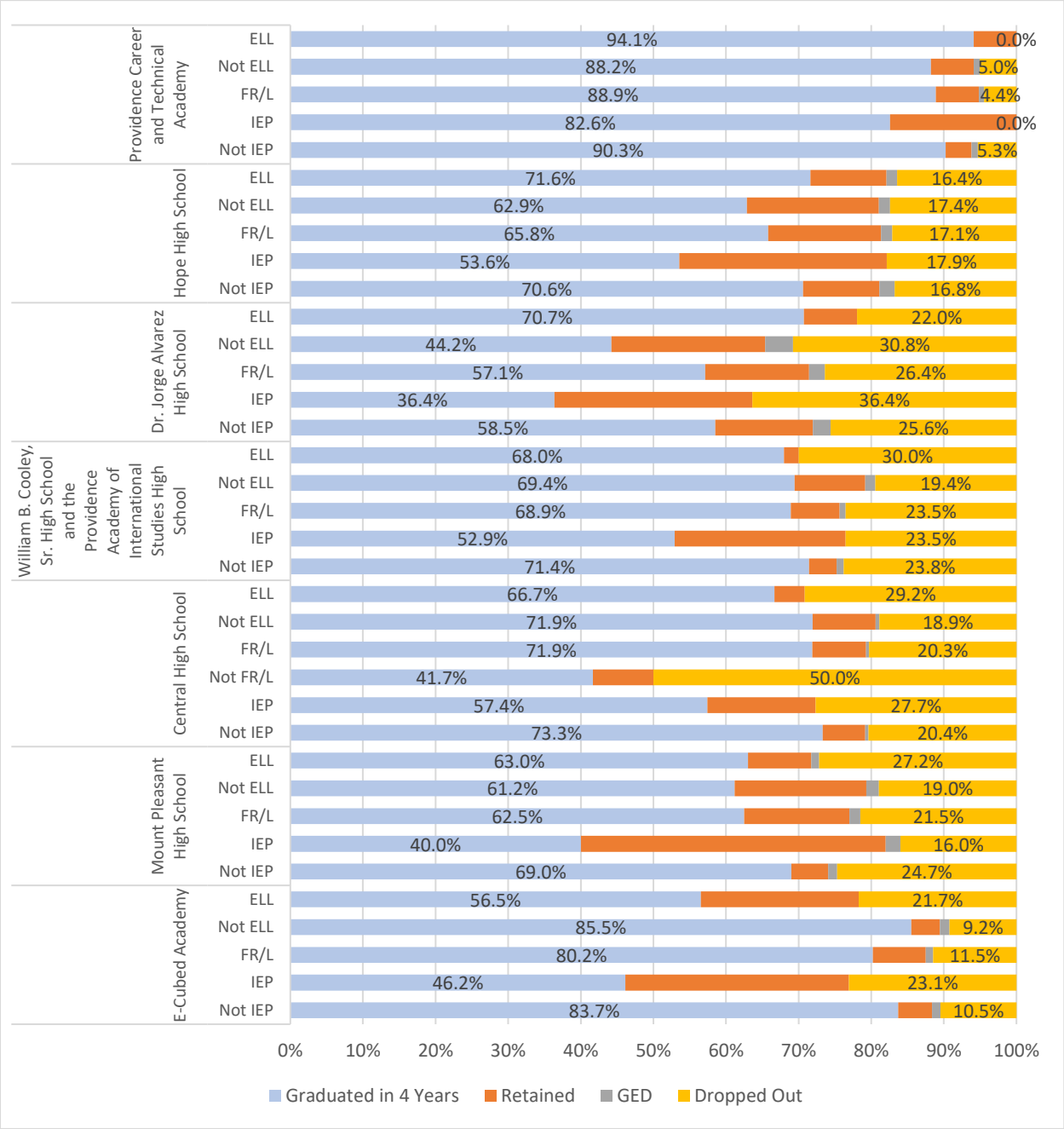
School	Hispanic	Black or African American	White	Two or More Races	Asian	IEP	FRL	English Learners
West Broadway*	✓	✓			✓	✓	✓	✓
Williams*	✓	✓				✓	✓	✓
Bishop*	✓			✓		✓	✓	✓
High								
Hope*	✓		✓	✓	✓	✓	✓	✓
Mount Pleasant*	✓		✓	✓		✓	✓	✓
Central	✓	✓	✓			✓	✓	✓
Alvarez*	✓	✓				✓	✓	
E3 (E-Cubed)		✓				✓		✓
Sanchez*	✓		✓			✓		
Career & Tech			✓					
Times2						✓		

Source: Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher
*CSI school

Graduation Rates

At almost all high schools in PPSD that enroll enough ELs for data reporting, fewer than three-quarters of them in the Class of 2017 graduated within four years. In most cases, the graduation rate for ELs and Non-ELs was like that of students with an IEP. Figure 19 shows these data on four-year outcomes by school and selected groups in the Class of 2017. The percentage of ELs graduating within four years by school ranged from 94.1 percent at Providence Career and Technical Academy to 56.5 percent at E-Cubed Academy. For Non-ELs, the percentage graduating within four years ranged from 88.2 percent at Providence Career and Technical Academy to 44.2 percent at Alvarez High School. In five of the seven schools, more than 20 percent of ELs dropped out—another sign of needed action.

Figure 19. 4-Year Outcomes by School and Subgroup (Class of 2017)[33]
Sorted by Percentage of EL Graduated in 4 Years



Source: CGCS analysis with data from Rhode Island Department of Education. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

[33] Excludes unreported subgroups due to sample size and schools for which RIDE did not report EL data (Classical High, Times2 Academy, and Academy for Career Exploration). Only graduation and dropout rates shown numerically.

IV. Findings and Recommendations

A. Vision and Shared Responsibility for ELs

Findings

During interviews, school visits, and discussions conducted by the Council team during its visit to Providence schools, it was evident that there was little sense of shared responsibility for the achievement of ELs in the school district. At the highest levels of the school system, leaders were unable to articulate the needs of ELs or define a vision of academic success for ELs. Most interviewees seemed more focused on the need for additional funding to serve ELs. It was clear to the team that the EL Office and its ESL specialists were solely responsible for the instructional support and academic performance of ELs. Few other departments were regularly involved, and the EL Office was not represented in regular cabinet meetings with the superintendent. Even in communications with DOJ, the EL Director was often the only instructional staff member other than attorneys representing Providence Public Schools. The Council team saw no other senior staff or departments tasked with responding to DOJ inquiries. Responding to and carrying out DOJ requirements fell primarily, if not solely, on the EL Director, even in cases when the tasks might rest more appropriately with other offices, such as Human Resources and Research, Planning, and Accountability. The lack of shared responsibility for ELs in Providence Public Schools was palpable in statements staff made to the Council team, some of which were offered as explanations as to why they could not provide services to ELs. The team heard statements from interviewees, such as:

- "schools do not have space for ELs"
- "principals are worried that ELs will affect the achievement scores of their schools"
- "we can't get an interpreter for Wolof"
- "we have no Spanish-for-native-speakers class because it complicates scheduling"
- "we do not have the budget for EL instruction and support"

***School Board*.** The Council team also met with two members of the board, who together had close to 20 years on the board, contributing to its relative stability. Despite that stability, the team saw many of the same EL challenges that the Council identified in its 2012 report on ELs. Board members painted a picture of a school system fraught with structural and budgetary challenges and expressed reservations about whether PPSD educators were equipped to improve the system. At the same time, the Board did not articulate a vision or direction for the system to reform practices for ELs. Instead, they offered a list of external hurdles for why serving ELs was difficult:

- PPSD was losing funds to charter schools as illustrated by a $42 million structural deficit, as the board shared with the team.
- Program and educational initiatives from the Mayor's office were not necessarily aligned to PPSD priorities and syphoned funding away from PPSD.
- Categorial state funding for ELs should be higher.

- The city-controlled budgetary and union negotiated practices were cumbersome and not necessarily aligned to the needs and calendar of PPSD. For instance, there was a six-month lag in finalizing the school district's budget due to the city's budget cycle. Initial budget requests were made in January but took until June to be finalized, greatly affecting staffing allocations.
- The city and PPSD do not have a reliable system for projecting enrollment, resulting in inaccurate predictions that exacerbate budgetary pressures and teacher shortages.

The school board also articulated that the district needed supports and professional development for school leaders to carry out responsibilities that come with site autonomy. At the same time, the board expressed interest in knowing what "are best practices in districts with site-based management." The same concern over site autonomy was expressed by some staff members in the central office.

Finally, the Council reviewed minutes of board meetings over the last two years and found little evidence that the board regularly asked for progress data on ELs, solicited program updates, regularly monitored EL performance, or held anyone responsible for EL outcomes.

***Providence Teachers Union*.** The Council team's discussions with PTU leadership clarified several statements that it heard about the rigidity of the teacher contract and shed light on attitudes the team witnessed from teachers. The PTU leadership indicated that it would beneficial to have a joint message from PTU and PPSD leadership on the importance of meeting the needs of ELs and to help incentivize teachers to complete EL certification requirements. In the PTU president's view, it would be important to have a joint statement reaffirming the district's commitment to the new population of students enrolling in PPSD. Further, the PTU president stated that "an important unified message would convey that it is a new day, and teachers will receive support, professional development, and knowledge to equip them to meet the needs of the PPSD students of today, many of whom are ELs or come from homes where English is not spoken." Other than forward-looking positive statements of shared responsibility, the discussion did not yield any PTU-led or encouraged initiatives or contractual elements that might demonstrate concrete commitment to meeting the needs of ELs.

Staff from Central Office and Schools. The Council team did not perceive in its interviews any sense of urgency from senior staff or school-level leaders in the district about the need to improve instructional outcomes for ELs. Still, the EL Office met with principals four times in the 2018-19 SY to learn about the DOJ Agreement, but competing priorities and limited time at principal meetings posed challenges to principals learning more about the Agreement and what leadership responsibilities they had in bringing Providence Schools into compliance. This was not entirely surprising given the lack of any formal pressure to hold school leaders and teachers accountable for the success of ELs. For instance, the Council's review of the administrator evaluation handbook used by PPSD and developed by the Rhode Island Department of Education (RIDE) showed a complete absence of language on English learners.[34] Admittedly, the handbook

[34] Rhode Island Department of Education. (2019). RI model guidance & FAQs. Retrieved August 16, 2019, from https://www.ride.ri.gov/TeachersAdministrators/EducatorEvaluation/RIModelGuidanceandFAQs.aspx

was intended for school districts across the state, some of which have few ELs, and is fairly generic, but one might expect some mention of the needs of ELs. The RIDE-developed handbook for teacher evaluation[35] makes some mention of ELs, but it telegraphs low expectations for ELs when crafting Student Learning Objectives (SLOs). Specifically, when discussing SLOs for ELs, the RIDE documents do not mention Common Core standards, despite the standards being mentioned for students with disabilities. Furthermore, rather than tying SLOs for ELs to grade-level content, RIDE recommends tying the SLOs to WIDA Can-Do descriptors, which only address English proficiency—not content mastery. Finally, the RIDE handbook includes an implied recommendation to modify content targets based on language proficiency:

> "All teachers should ensure their content targets for ELs are informed by students' language comprehension and communication skills. "(p. 26)

However, in the judgment of the Council team, ELs do not require lower content targets than other students; they need a nuanced understanding of how content knowledge is communicated when English proficiency is still under development. In contrast, RIDE's handbook treats the development of SLOs for students with disabilities (SWD) in a more nuanced manner that does not call for lower content standards. Linking SLO targets to Common Core standards is explicitly mentioned for these students, and the RIDE document calls for anchoring SLOs in grade-level content and setting targets that are rigorous for SWD. Finally, the guidance recommends collaboration between special education and general education teachers to set SLOs for SWD, but there is no parallel recommendation for setting SLO targets for ELs.

Rhode Island ESSA State Accountability Plan provides scant attention to ELs. The federally approved ESSA accountability plan for Rhode Island does not include accountability elements for holding schools accountable for the achievement of ELs or for assessing progress made on EL achievement. A few examples illustrate this point—

- The school quality components do not include many measures that are EL-sensitive. Pursuant to federal law, the state accountability plan does include an English Language Proficiency Progress Index, but its indicator on English Language Proficiency is outweighed by its indicators on ELA and math proficiency and growth. The implications of this under-weighting fall particularly hard on Providence, where over half of the district's schools have over 30 percent ELs.
- The Comprehensive School Improvement Plan template posted on the RIDE website[36] does not mention ELs once; it mentions multilingual learners once, asking schools to specify in their plans how they will implement evidence-based interventions: "any special considerations for specific populations of students, if applicable—in particular,

[35] Rhode Island Department of Education. (2018). Rhode Island model evaluation & support system. Retrieved from https://www.ride.ri.gov/Portals/0/Uploads/Documents/Teacher_Guidebook_Ed_IV_7.31.18.pdf

[36] Rhode Island Department of Education. (2019). Comprehensive school improvement plan. Retrieved August 5, 2019, from School Improvement website: https://www.ride.ri.gov/InformationAccountability/Accountability/SchoolImprovement.aspx

multilingual learners and differently-abled students." However, district staff reported that school-level CSIPs do include EL components.

- The Council's review of a sample of PPSD School Improvement Plans[37] (SIP) gave some but limited attention to ELs. The sample of SIPs reviewed by the Council showed that most of the EL-related efforts were akin to 'intervention' programs that were often technology-based, such as Summit Learning, Imagine Learning, or Aleks.

Recommendations

Making lasting improvements to the EL program in PPSD will require a systemic commitment to the success of these students that goes well beyond the requirements of the DOJ Agreement. Shared responsibility means that governance teams, senior leadership, departmental staff, and teachers explicitly include the needs of ELs when making decisions, formulating policy, and developing initiatives that affect both the general instructional program and EL-specific strategies. Specifically, the Council team recommends—

1. Review and modify all state guidance documents and improvements plans and infuse them with specific language calling for the upgrading of all instructional priorities around ELs.
2. Create a multi-departmental state and local EL-DOJ task force made up of senior level staff, including representatives from the Office of Research, Planning, and Accountability (RPA), Human Resources, and Zone Executive Directors, which would have the joint responsibility for designing, implementing, and overseeing deliverables outlined in the DOJ Agreement. The EL Director would serve as project manager, maintaining the Agreement timeline and ensuring deliverable due dates. The task force would delineate EL-related outcomes and indicators relevant to each of the offices and departments, state and local. Meetings would be scheduled around deliverables, rather than weekly check-in meetings that currently take place. This task force would also ensure that EL needs are incorporated into any districtwide efforts to improve general instruction in Providence Public Schools.[38]
3. Maintain a direct line between the EL Office and the Chief Academic Officer and provide a mechanism by which EL issues are regularly discussed in cabinet meetings. Ideally, the EL Office would be included in cabinet meetings at which important decisions affecting all students in Providence, of which 30 percent or more are ELs, are discussed.
4. Accept the offer of the PTU President to make a joint statement signaling to the district and teachers that ELs be made more of a priority. Elements might include professional development, credentialing, and the collective bargaining agreement. Hold everyone accountable for following through on the pledge.
5. Charge the Chief Academic Officer and supervisor of principals—or Zone Executive Directors, with incorporating EL-related outcomes/indicators in the formal evaluations of each department or office and reporting them publicly to the state, superintendent, and EL-DOJ

[37] Providence Schools Academics Department. (2018). School improvement plans. Retrieved August 5, 2019, from https://www.providenceschools.org/Page/1698

[38] Johns Hopkins Institute for Education Policy. (2019, July). *Providence Public School District in review*. Johns Hopkins University School of Education.

task force in accordance with DOJ Agreement timelines. Similarly, incorporate EL-related outcomes into senior staff, principal, and teacher evaluation rubrics. Encourage RIDE to revise their evaluation handbooks to include ELs in a manner that ensures equitable access to core grade-level standards.

6. Charge senior leadership with defining a systemwide series of articulated EL programs, instructional components, program investments, and metrics and incorporate their implementation into district and school improvement plans, specifically for CSI and the TSI schools identified due to the underperformance of ELs. (See subsequent recommendations.) EL achievement should be an integral component of the district's direction and accountability.
7. Charge principals with the responsibility of managing EL programs according to the strategic models defined by senior leadership in the district or state. EL coordinators at each school would assist with this duty, maintain data on program elements, and communicate with parents on the progress of their children.

B. Registration: Identification and Placement

Findings

Structural constraints. During its site visit, the Council team observed that the structures and placement procedures for serving ELs had failed to keep up with the increase in EL enrollment since the Council's original review in 2012. Providence Public Schools continues to use a "seat"-driven process that determines instructional program availability, rather than the program being defined around the needs of students enrolled in the schools. The Council team detected that these program "seats" were linked to specific settings and were determined through the budget process that takes place the prior year, with little possibility for adjustments based on actual EL enrollment. The seat-driven system results in the following:

- Artificially constrained EL "seats" that have EL classes overenrolled while some non-ESL classes are at 50 percent or lower capacity;
- Students remaining at home while they wait for a "seat" to become available; and
- Students being moved to a school that has a "seat" for them, even if it is far from home.

Overall, the seat-driven structure creates artificial shortages in ESL instruction that guarantee that ELs will not receive appropriate services on a timely basis and that constrain equal access to the district's curricular offerings. Consequently, the current distribution of EL programs across PPSD is not predictable because it is tied to available teachers and "seats."

EL families do not have equitable access to school choice. As we indicated in the previous section, the structural constraints created by "EL seats" limits EL program placements and by definition restricts equitable participation of EL families in the PPSD school-choice process. The *Choice Process Check List* posted on the PPSD website to guide parents through the school choice process in grades K, 6, and 9 provides minimal guidance and only mentions ESL programming in

a footnote.[39] For instance, the site asks parents to call a number to find out the name and location of their neighborhood school. When calling this number at 4:30 p.m., a recording (only in English) asks parents to leave a message. Typically, schools have attendance-area maps of their neighborhood schools and/or an automated 'look up' search engine. Yet, in Providence, parents are directed to look up individual school sites to find more information or are told to attend a *Choice Fair*, for which no date or location is provided. In addition, the *Checklist* provides no specific guidance for parents but, rather, it includes a warning of sorts:

> "Remember, if your child's educational program (for example, ESL) is NOT offered at a school, that choice becomes INVALID and will not be considered (remaining choices are bumped up in preference)."

It was unclear how this warning is helpful to parents when they have no way of knowing which schools offer ESL or bilingual programming. An internet search and a search on PPSD's website provided no information on which schools have EL programs. EL families, therefore, have no meaningful access to information on the location of EL programs, times or locations for registration, or grade levels when the choice process begins. School choice is further hampered by limited access to transportation for a large portion of Providence families (50 percent of all Providence residents) who speak a language other than English at home.

Having access to quality programming for ELs should not be contingent on 'school choice,' especially when nearly one in three PPSD students are identified as EL. Each school should have the capacity to effectively serve ELs in a district with so many of such students. Specialized programs (such as dual language or developmental bilingual) might be provided in a well-designed system of school choice across the district, allowing for choice of schools relatively close to home, but core instructional programming for ELLs should be nearly universal.

***Staffing constraints*.** In addition, the accurate identification of ELs when they register for school is contingent on having qualified staff who are well-versed in EL programming offered in the district and in the assessment of English proficiency. The Council team was told by interviewees that there was a need for qualified staff to handle the volume and complexity of EL placements. In the absence of such staff, placement errors were apparently common. For instance, the team learned that some students were placed according to the number of years of schooling reported during the intake process, rather than the age of the student or their English proficiency levels. At the time of the Council's site visit, the Registration Office was staffed with only three individuals who could screen ELs. Providence requires such individuals to have bilingual teacher certification. The EL Office's attempt to supplement staff (with individuals who met the RIDE and WIDA screener requirement) to accelerate the intake process was met with a union grievance.

The Council's review of RIDE regulations and WIDA requirements confirmed what the team heard from the EL Office: RIDE does not require bilingual certified teachers to administer the screener and neither does WIDA. RIDE regulations state, "ASSESSOR – a person who has been WIDA

[39] Providence Public Schools. (n.d.). Choice process check list. Retrieved August 5, 2019, from https://www.providenceschools.org/site/default.aspx?PageType=3&ModuleInstanceID=6081&ViewID=7b97f7ed-8e5e-4120-848f-a8b4987d588f&RenderLoc=0&FlexDataID=17382&PageID=3326

certified to administer prescribed EL assessment tools and who is qualified to evaluate the results of these assessments. This person must have knowledge concerning the ways English learners acquire English as a second language."[40]

Eligible Not Enrolled (ENE) and parental choice. Providence has historically struggled with high numbers of ELs who are eligible for services but whose parents have waived them. PPSD codes such students as ENE. In the Council's review in 2011-12, we noted a sharp increase of such students, reaching 703 in SY 2010-11. In the most recent review conducted by DOJ, ENEs again appear to be an issue requiring attention. The number has continued to increase, with PPSD reporting to DOJ a total of 807 ENE students in September 2018. In both Council reviews, as well as in the DOJ review, PPSD has indicated that the lack of EL-seats and the shortage of EL teachers were major factors, creating an arbitrary constraint in available placements, therefore leading to parents waiving their child's EL services to secure a seat in a selected school. The Council's 2012 review found that the most frequent type of waiver request involved those that were requested by parents at the time of initial registration.

In subsequent updates by PPSD, the Council learned that progress was being made in meeting with ENE parents to explain the EL services their child was entitled to and to confirm whether they wished to waive these services. Staff at each school have received professional development on how to do this and were provided with a PowerPoint to help in speaking with parents of ENE students. Additionally, to maximize the number of ELs who receive language services, the EL Office has revised the registration process and waiver form so that waivers are only valid for a year at a time. As a result, over 500 additional students will be participating in EL services in SY 2019-20 in the same school in which they are already enrolled.

Parental information and rights. As indicated, information about EL programs and school locations of EL programs are not readily available on the PPSD webpage. Moreover, parental rights to descriptions of EL programs are mentioned on a dated page referencing the 2012 No Child Left Behind waiver process for the SY 2012-13 school year, requiring parents to take the next step by calling for information. The revised forms are a step in the right direction, but the Council's review of documents and forms that were made available to EL parents suggests the need for additional revisions.

Recommendations

The appropriate and timely placement of ELs into effective instructional programs selected by EL families requires well-designed pathways to fully articulated and staffed EL program models, school-by-school. Ideally, each of Providence's public school zones should offer all district-supported EL program models, so families could select the one they prefer for their child without having to travel excessive distances. The Council team recommends the following for improving the EL identification and placement process—

8. Establish a district goal that within the two years, each school will develop the capacity to effectively serve ELLS and will, minimally, provide ESL programming, EL access to core

[40] Rhode Island Board of Regents for Elementary and Secondary Education Regulations Governing the Education of ELs, Administrative Terms (p.5)

content, and all enrichment and elective opportunities. In addition, the district should strive to ensure qualified staff to support effective EL instruction at each school. In other words, the district should have in place the programming, supports, and professional development needed to enact the *Parent Bill of Rights*.

9. Identify schools that will offer specialized language programs (such as dual language or developmental bilingual) as well as a process for identifying community interest and demand for opening additional programs. Consider exploring the possibility of adding a Portuguese/English dual language program.
10. Charge the EL Office with leading a cross-departmental team with representatives from Registration, Parental Engagement, and Multiple Pathways to streamline information about the instructional programs available for ELs, including selective schools, gifted, and alternative programs. These descriptions should be in written and video format (housed on the PPSD site) for families to view when needed.
11. Charge the EL Office with making the following changes to materials provided to EL parents and making these documents readily available on the PPSD website:

    - *Parents' Bill of Rights and English Learners Programmatic Appeals Process.* These documents provide comprehensive and updated information. The Council team recommends that these documents be translated into the top 3-5 languages spoken by EL families. Brief videos in these languages would make them even more accessible. They should then be posted on the PPSD website and made available *via* mobile access to the internet.

    - *Providence English Learner Programs for SY 2019*-20. This document should be revised to show the new classification of programs as described in *Section E. EL Instructional Program*. The descriptions need to be written from the parent's perspective with clearly detailed elements, including outcomes, language of instruction, grade-level offerings, and the duration of programming in the case of the newcomer program. Program descriptions should fall into two general categories: a) ESL and b) bilingual education and dual language programs. Currently, the listing of schools is not very helpful for parents, as they would need to go to the website to look up information on schools; many EL parents have limited access to the internet. We recommend, therefore, that the website have an easy-to-navigate interactive map that shows the schools across the city having various EL programs and a search engine for parents to find their neighborhood school.

    - *Notification of Initial EL Identification and Eligibility for EL Services Form.* This form currently includes inaccuracies that need correcting. It also includes extraneous information that would be better found in other documents. The options under EL Program Eligibility should ***only*** be **eligible** and **not eligible,** and NOT include whether the parent waived services. At the end of the notification form, a box should be included to indicate whether the parent requested a waiver. On Page 2 of the notification form, revise "EL certified educator" to "qualified staff," as there are no regulations that require a 'certified' educator to carry out this task. PPSD should assign qualified staff to assist EL parents in selecting EL instructional programming. Parents should make their selection

only from EL Instructional Programs, of which general education is not one. (General education is received by everyone.) The list of EL programs should include basic but important information for EL parents, such as—

Table 10. Program Model Description for Parents

<table>
<tr><th></th><th>ESL & Sheltered Content Instruction in English</th><th colspan="2">Dual Language</th></tr>
<tr><th></th><th></th><th>Developmental Bilingual Education</th><th>Two-way Immersion</th></tr>
<tr><td>Purpose & Outcomes</td><td>• College- and career-readiness
• ELs become proficient in English in 3-5 years</td><td>• College- and career-readiness
• ELs become proficient in English in 4-5 years
• ELs develop academic proficiency in their native language</td><td>• College- and career-readiness
• ELs become proficient in English and develop academic proficiency in their native language
• Non-ELs acquire an academic proficiency in a new language in 4-5 years</td></tr>
<tr><td>Language of Instruction</td><td>English is the primary language of instruction</td><td>90/10 Model
Beginning in K, when ELs are entering with minimal English proficiency, the model calls for 90 percent of instruction to be delivered in Spanish.
In K, instruction is mostly delivered in the native language and 10% in English. By Grade 4, the language allocation should reach the target goal of 50 percent in English and 50 percent in Spanish, continuing on through grade 5.
<table><tr><th>Grade</th><th>E/S</th></tr><tr><td>K</td><td>10/90</td></tr><tr><td>1</td><td>20/80</td></tr><tr><td>2</td><td>30/70</td></tr><tr><td>3</td><td>40/60</td></tr><tr><td>4</td><td>50/50</td></tr><tr><td>5</td><td>50/50</td></tr></table></td><td>50/50 model
Starting in K, half of the instructional time is delivered in Spanish and half in English. This 50/50 distribution on the language of instruction remains the same up through Grade 5.</td></tr>
<tr><td>Grade Levels</td><td>All levels</td><td>Grade K through 5</td><td>Grades K through 5</td></tr>
<tr><td>Program Participation</td><td>All ELs can participate at any time</td><td>Parent commitment that their child remains in the program over time is requested to optimize program benefits.
Students typically enter at kindergarten or Grade 1. Spanish-speaking ELs and others with demonstrated Spanish proficiency may participate at any grade level.</td><td>Parent commitment that their child remains in the program over time is requested to optimize program benefits.
Spanish-speaking ELs can enter at any grade level.</td></tr>
<tr><td>Exiting from EL Services</td><td>ELs exit the program when they reach proficiency in English.</td><td colspan="2">ELs would exit from the LEP status when they meet the English proficiency criteria but this change in status would not require them to leave the Dual language programs. In fact, the school would prefer the student remain in the program.</td></tr>
<tr><td>World Language Articulation</td><td>• World Language Exam to receive a Silver Seal of Biliteracy
• High school credit for world languages by exam</td><td>• Gold Seal of Biliteracy of Rhode Island for high school graduates who have attained an Intermediate-mid level of proficiency or higher in listening, speaking, reading, and writing in one or more world languages, and have mastered English for academic purposes.
• High school foreign language credit in Grade 8</td><td>• Gold Seal of Biliteracy of Rhode Island for high school graduates who have attained an Intermediate-mid level of proficiency or higher in listening, speaking, reading, and writing in one or more world languages, and have mastered English for academic purposes.
• High school foreign language credit in Grade 8 and credit by exam in Grade 9</td></tr>
</table>

Delete the section that asks EL parents to accept a placement other than the one they selected, as this limitation is the result of the restricted 'seat' model that must be revamped to allow PPSD to build the required capacity of its schools to meet the needs of the growing number of ELs.

- *Waiver from English Learner (EL) Programming.* Rather than asking an open-ended question about why a parent is waiving EL-services for their child, the form should include a drop-down menu with options that are accurately coded for data collection.
- *Change of English Learner Program Request Form.* While EL parents are entitled to waive EL services for their child at any point, the choice should reflect the parent's will and not district's neglect in providing services to the child. Capacity constraints of the district are not justifiable reasons to waive EL services, and parents should not be asked to approve or acquiesce. The form should include the same statements on Parental Rights and "seat availability" should be removed as a rationale for requesting a change in program. The district should not be requesting a programmatic change. Rather, a recommendation based on sound educational reasoning could be made for parents to approve. Section II of the form should reflect the typology of EL programs described in all information documents—with an option for "none" of the EL program models.

12. Charge the EL Office, Registration, and Parent Engagement offices with reviewing and revising as needed the registration process to minimize parental visits required and the time spent at each visit, while maximizing the information provided. For example, while student English proficiency is being assessed, parents could be provided videos, brochures, and staff support to help them understand various program availability. Availability should be shown on a map and include specific information on transportation and afterschool care. A coordinated registration process should also ensure that any special education-related screening that is needed also takes place at this time—or is immediately scheduled in coordination with the Specialized Instruction Office. The process should also include helping EL parents navigate the school choice process in grades K, 6, and 9, considering available EL programs in neighborhood schools. Information should also include entrance requirements for selective schools. The Council examined U.S. Census data on access to transportation and types of occupations and confirmed what its team heard anecdotally: EL families have unreliable access to transportation and are employed in jobs that typically have limited flexibility in their schedules. Given both factors, the currently limited office hours for registration and the single location for registration are not responsive to the realities of EL families, and therefore, should be reconsidered to include alternative hours and locations.
13. Charge the EL Coordinator to work with the Principal or Assistant Principals at each school and coordinate registration with the Registration Office, EL Office, and others to ensure coherence in the student program placement.
14. Charge the EL Director to collaborate with the Human Resources Office and PTU leadership to remove artificial barriers to expanding the number of staff employed to complete the EL screening and placement process. Neither RIDE nor WIDA require that screeners have a bilingual credential, and individuals with such credentials are in great demand for PPSD classrooms. The new provisions and practices should clear the way to create two additional

positions that would (a) screen students and (b) meet with families to review data and discuss EL placement options, neither of which require a teaching credential but would necessitate knowledgeable individuals.

Assessors/screeners would not necessarily be involved in the placement of students; this could be left to staff who have knowledge of instructional programs for ELs in PPSD. Individuals who currently handle these responsibilities and have a bilingual credential could move to schools to teach ELs, serve as EL coordinators, or fill other positions that help meet EL needs and require the bilingual credential.

15. Supplement the existing three EL screeners at the Registration Office during peak times of student registration in order to prevent asking parents to return for their child's assessments. Temporary supplemental staff or expanded capacity could be secured by—
    - Reviewing historical enrollment data to identify peak enrollment periods.
    - Partnering with organizations that could offer services needed for a student's registration. For instance, PPSD could partner with the Providence Community Health Center to offer immunizations on site for students who need them.
    - Partnering with organizations that serve specific populations such as refugee families. For instance, the Council team learned that a contract with Dorcas International Institute of Rhode Island is up for renewal, which presents an opportunity to renegotiate terms to address current registration priorities.
    - Hiring retirees from Providence Public Schools on a short-term basis.
16. Place ELs in a neighborhood school on a temporary basis if there are delays to assessing English proficiency, rather than having them sit at home. In the absence of completed assessments, the placement should be age-appropriate. Per the DOJ Agreement, assessments should be completed within 20 days. The data system should flag students waiting to be assessed and send an email to the EL Office and Registration Office to remind them to complete the assessment. Rather than requiring parents to take their child to the registration center, assessor/screeners could be deployed to schools to administer the assessments.
17. Make the Director of Student Placement and Registration—along with the EL Office—responsible for the quality and accuracy of the intake process and EL placement. The EL Office should provide ongoing professional development to staff involved in the registration, screening, and placement processes.
18. Charge the EL Office with leading a working group that includes staff from the Registration and Parent Engagement Offices to design a portfolio of materials on available EL programs, parental rights, the school choice process, and access to specialized programs, including advanced academics and special education. This portfolio could include a combination of print and video resources for parents to review prior to having a one-on-one meeting to select a final placement.
19. Charge the EL Office with developing a staff guide to student placements. Require that staff in the Registration Office as well as school administrators and instructional leaders at all school levels—elementary, middle, and high school—use the guide. Guidance would include

specific information on best practices for assessing and placing students and for monitoring EL progress from the moment they enter PPSD and as they move through its schools. The team recommends the following:

- Ensure that ACCESS scores are not the sole basis for placing students and defining language levels. It is important that overall ELP levels calculated from ACCESS scores be once-a-year snapshots of the four distinct domains of language for the primary purpose of ESSA-required accountability and reporting. The one-time score is not meant to be a barrier or a requirement for students to be promoted to the next grade level. Moreover, to the extent ACCESS scores are considered for student placement and instructional services, district educators will want to look at scores in specific domains—Listening, Speaking, Reading, and Writing—for a more nuanced picture of how a student's English proficiency is developing.
- Years of enrollment in U.S. schools are an important factor in considering initial placement and ongoing progress. ELs who have been in U.S. schools, whether in Providence or elsewhere, should not receive the same instructional support that may be provided for newcomer ELs.
- A student's current grades in academic courses and ESL provide important information about their academic next steps for instruction and supports. (Grades may also illuminate inappropriate or harmful grading practices that should be examined.) A passing grade for ELs should be the same as for other students. Consequently, an EL who earns a "C" or higher should not be required to repeat a course.
- Teacher judgement provides an important component to the assessment of a student's overall learning. Guidance, however, should be provided to ensure that teacher judgement contributes to each student's forward movement rather than limiting or decelerating a student's movement.
- Parent input and consultation is a critical component to student success. Guidance in supporting parents and enlisting their perspectives on their children's education should be developed and nurtured.

In Tables 11 and 12, an example is provided on how ACCESS scores (or those from another screener) in conjunction with "time in U.S. Schools" could be used to make initial EL placements. The sample placements are based on year-to-year efforts to gather information that will continue a students' forward movement in English acquisition. Specifically—

- Students are expected to continue to the next higher level of English Language Development instruction in the subsequent year, rather than remain and repeat the same ELD course. Additional support may be provided, as needed, in the subsequent level of ELD.
- If a student's ACCESS scores are below the expected level, other factors such as grades, teacher judgements, or individual domain performance should be used to determine movement to the next level rather than relying solely on the composite ACCESS score.

- Clear and compelling reasons—using multiple measures—should be used to justify why a student should repeat a course. This important decision should not be based solely on ACCESS scores or any other single factor.
- In situations where students are not progressing as expected, the district should take a close look at the instructional program and make needed modifications to improve instruction, expand learning opportunities, provide appropriate resources, or raise expectations.
- The district should expect accelerated learning and a full range of grade-appropriate learning opportunities for ELs working alongside their peers. Student participation in segregated instructional settings (e.g., full sheltered) should, in most cases, be limited to the first year (or two, maximum) of instruction. Students should then participate in more integrated settings and be provided additional instruction and supports as needed to sustain progress.

Using tables such as the ones shown below (adapted from district and DOJ guidance), EL Office specialists and EL coaches should work with the Registration Office and schools to ensure that the EL placement is appropriate and well-documented in the student data system in order to track timely and appropriate placements, EL services, as well as student growth and progress in English and academic content. It is important to note that the tables are intended as guidance. (See Tables 11 and 12.) Exact student percentages and numbers may vary depending on a school's context. In addition, individual assessment domains, teacher judgment, academic performance, and parent recommendations may be considered in placing students appropriately. If used, these factors should be documented for each student.

Table 11. Elementary Placement and Scheduling Guidance[41]

If student's overall composite proficiency level on ACCESS 2.0 or WIDA Screener is:	Place in:	And schedule ELD with EL-Certified Teacher(s)
1.0 – 3.0 *With less than two years of U.S. Schooling*	**Sheltered ESL**	ESL-certified classroom teacher provides ELD as a separate block to Level 1-2, and Level 3 ELs.
3.1 + Or **1.0 - 3.00** *with two or more years of US schooling*	**Integrated ESL** ELs clustered and placed in grade-appropriate classrooms, and comprising up to half (50%) of students in class	ESL-certified classroom teacher provides ELD as a separate block for ELs up to Level 3. *Levels 4 and 5 do not need a separate ELD period as ELD can be embedded in content areas.*
	EL Collaborative **(Gen. Ed/Sp. Ed)** ELs clustered and placed in grade-appropriate classroom, and	ELC Coach/Collaborative teacher provides ELD as a separate block for ELs if the classroom teacher is not ESL certified.

[41] Students participating in dual language receive ELD within the program.

	comprising up to 25% of students in class	*ESL certified classroom teacher provides ESL, embedded in content, to Level 4 ELs.*
Grouping/Clustering for ELD	• Students with composite English proficiency of less than 3.0 and with two or more years of U.S. schooling should be grouped with Level 3s • Students with English proficiency of 4.0+ may receive ELD embedded in content • DOJ-specified grouping of ELs for ELD: o English proficiency level within a single grade, or across two consecutive grades. (e.g. Level 3s in Grade 2, or Level 3s in Grade 4 and Grade 5) o Or within two consecutive English proficiency levels within a single grade (e.g. Levels 2 and 3 in Grade 4)	

Table 12. Middle School and High School Placement and Scheduling Guidance[42]

If student's overall composite proficiency level on ACCESS 2.0 or WIDA Screener is:	**Place in these courses:**
1.0 - 1.9 **Newcomer and SIFE** *With less than one year of U.S. Schooling* *(*upon approval, a SIFE student may participate for one additional semester*)*	**Newcomer Program** • **ELD** – Beginning • **Content Courses** o Introduction to Literacy Studies (9th grade ELA – may take extra time during day to meet standards) o Sheltered Science o Sheltered Mathematics (grade-appropriate) o Credit-bearing Electives (e.g. theatre, art, PE). May be clustered in elective classes.
1.0 – 3.0 *With one to two years of U.S. Schooling* *(Note: In most cases, ELs with more than one year of schooling should not be placed in, or repeat, a beginning ELD course. Place them in the intermediate*	• **ELD –** *Intermediate (or Advanced)* **ELD** • **Content courses:** *Follow general course sequence.* o **Grade-level English (ELA)** o **Core courses** o **Electives** ***For continuing Newcomer/SIFE ELs:*** • **ELD –** *Intermediate (or Advanced)* **ELD** • **Content courses:** *Follow customized course sequence resulting in graduation/college entrance in 4-5 years* o **Grade-level English (ELA)**

[42] This is intended as guidance; exact student percentages and numbers may vary slightly depending on the school context. In addition, individual assessment domains, teacher judgement, academic performance and parent recommendations may be factored in placing students appropriately. If used, these factors should be documented for each student. (See recommendations for program design and course sequence for students enrolling in high school as Newcomer or SIFE.)

level, offering support as needed)	○ **Core courses** ○ **Electives**
3.1 + or **1.0 - 3.00** *with three or more years of U.S. schooling*	• **ELD –** *Advanced* **ELD** • **Content courses:** *Follow general course sequence.* ○ **Grade-level English (ELA)** ○ **Core courses** ○ **Electives**
	For continuing Newcomer/SIFE ELs: • **ELD –** *Advanced* **ELD** • **Other Content courses:** *Follow customized course sequence resulting in graduation and college- and career-readiness (e.g., college entrance) in 4-5 years.* ○ **Grade-level English (ELA)** ○ **Core courses** ○ **Electives**
Teacher Requirements	**ELD -** Taught by EL-Certified Teacher(s) - or teacher on track to be certified. **Content courses -** Taught or co-taught by ESL-certified teachers or teachers on track to be ESL-certified.
Student Clustering	• ELs may be grouped, per DOJ, together for ELD by: ○ English proficiency level within a single grade, or across high school grade spans (e.g., Level 3s in Grade 9, or Level 3s in Grades 9-12) ○ Or within two consecutive English proficiency levels within a single grade (e.g. ELD A and B – in one class – Grade 9) • ELs may be clustered in content courses with teachers who are EL-certified teachers or on track to be certified.
High School	• Goal: Placements for ELs ensure that all courses and schedules (and credits earned) contribute to and prepare students for graduation and college entrance. • Ensure that the correct course numbers and earned credits are accurately entered and appear on student transcripts—to ensure graduation and college entrance requirements are met by all ELs.

C. EL Access to Curriculum and Services

Findings

In this section, we describe the team's findings on instructional program for ELs in Providence Public Schools. The team's findings focus on EL-specific services and access that ELs have to the entire curriculum and program offerings in Providence Public Schools. The team's findings are based on a review of PPSD general curriculum documents, observations during school visits, and interviews with staff and parents.

EL Access to Curriculum

This review does not include a full review of the district's curriculum. However, we considered the general curriculum to be an important element in the broader academic achievement of ELs in PPSD. Fixing the district's EL programs will have little meaning if the broader instructional program that they are exposed to is of low quality and not aligned to the college- and career-readiness standards that the state has approved. The team noted that district leadership did away with its scope and sequence documents and replaced them with "standards bundles" to provide teachers and school leaders with greater discretion consistent with the district's move towards enhanced site-based management. The team was told, however, that there was considerable concern about whether principals were ready for so much autonomy, given the lack of guidance and support provided by the district in implementing Common Core standards-aligned instruction.

The team also looked at the leadership and direction of the curriculum and instructional offices of the district. The Council team found that starting around 2015, a series of staff changes disrupted the stability of the department. For instance, the lead math position was vacant for a year before it was filled in June 2016. The literacy position was vacant for six months before being filled in August 2018. Both directors of EL and Specialized Instruction left their roles to become principals in SY 2017-18. The EL Director position was vacant for most of SY 2017-18.

Furthermore, the team was told that there was inadequate support around the acquisition of instructional materials, the provision of special education, the design of classroom lessons, unit development, the translation of standards into grade-level expectations, and budgeting as the district devolved authority to schools. The team was also told about work being done around the *Keys for Learning,* which focused on problems of practice and the alignment of various materials, platforms, and strategies.[43]

Staff indicated that work was underway with teachers and coaches who were developing coaching tools and student outcome rubrics that would illustrate how effective practices and student outcomes look. The Council team found that little of this work involved EL-relevant strategies for developing academic language and conceptual understanding of content.

Curriculum Guides. First, the Council looked at the general curriculum itself, which involved the district's "standards bundles." The Council reviewed samples of PPSD curriculum guides for mathematics, English language arts, and science, using the Council's rubric for evaluating curriculum, *Supporting Excellence: A Framework for Developing, Implementing, and Sustaining a High-Quality District Curriculum*.[44] This curriculum framework is built around seven key features that distinguish a strong, standards-aligned curriculum from a weak one. A strong, standards-aligned curriculum typically—

[43] Providence Public Schools. (n.d.). Keys for learning (KFL). Retrieved August 7, 2019, from https://sites.google.com/providenceschools.org/kfl/kfl-strategies

[44] Council of the Great City Schools. (2017, June). *Supporting excellence: A framework for developing, implementing, and sustaining a high-quality district curriculum*. Retrieved from https://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/4/Curriculum%20Framework%20First%20Edition%20Final.pdf

1) reflects the district's beliefs and visions about student learning and achievement;
2) is clear about what must be taught and at what depth to reflect college- and career-readiness standards at each grade level;
3) builds instructional coherence within and across grade levels consistent with college-and career-readiness standards at each grade;
4) explicitly articulates standards-aligned expectations for student work at different points during the school year;
5) contains scaffolds or other supports that address gaps in student knowledge and the needs of ELs and students with disabilities to ensure broad-based student attainment of grade-level standards;
6) includes written links to adopted textbooks or computer-based products to indicate where materials are high quality, where gaps exist, and how to fill them to meet district expectations; and
7) provides suggestions for the best ways to measure whether students have met specific learning expectations.

Specifically, the Council reviewed curriculum materials for English language arts and mathematics (grades K, 3, 7, and 9) and science (grades K, 7, and 9) using the *seven key features* as criteria. The Council team found that the PPSD Curriculum Guides were lean at best. The bundles listed standards for each unit and, in some cases, corresponding instructional materials. But, overall, the team found that the curriculum guides required significant revisions and amplification to provide more accuracy in describing standards, more concrete exemplars for unpacking the standards, overall greater coherence, and expanded guidance for teachers on how to provide scaffolding for ELs and other students. These finding were consistent with what the Council team heard from PPSD staff who indicated teachers needed more guidance than what was currently provided in the district's curriculum guides.

The Council is happy to provide more detailed observations about the district's curriculum, but for brevity's sake, we summarize our review of sample curricula below, grouped under each of the *7 Key Features*.[45]

Key Feature 1: *A district's curriculum documents reflect the district's beliefs and vision about student learning and achievement.*

The Council found that the PPSD's curriculum guides for ELA, math, and science each list the standards that will be addressed in each unit from the Common Core State Standards in the case of ELA and Math and the Next Generation Science Standards in the case of science. However, these listings were not accompanied by an introduction or explanation within the unit to link the district's beliefs and mission to its instructional practices. In the absence of this explicit link to the district's beliefs, the curriculum is open to multiple interpretations that, in turn, could lead to implementation that falls short of what the district intends.

[45] The Council will make available to the district detailed, annotated copies of the curriculum reviewed by Council staff.

Key Feature 2: *A district's curriculum documents are clear about what must be taught and at what depth to reflect college- and career-readiness standards for each grade level*.

The Council found that in all three content areas (ELA, math, and science), beyond the listing of standards found in each unit and some essential questions in one or more grade levels, the guides lacked:

- Exemplars of student work that might help all teachers develop a common understanding of the goals for student learning.
- Explanations of the depth or precise meaning of the standards for each unit. For instance, in the case of ELA standards that might remain unchanged across grade levels, the guide should clearly indicate how depth of knowledge, demonstration of expanded use of academic vocabulary, and clear articulation of ideas evolves as students move from one grade level to the next.

Key Feature 3*: A curriculum builds instructional coherence within and across grade levels consistent with college- and career-readiness standards for each grade.*

The PPSD curriculum guides show inconsistent coherence from grade to grade and within particular grades, regarding college- and career-readiness standards. In the case of ELA and math, the bundles include some reference to learning from the previous grade level and extensions to the next grade level, and some sample units and lessons do illustrate instructional coherence within a grade. But in all three content areas reviewed, the guides do not explicitly indicate how current grade level standards are connected to previous and later grades, or how learning develops over time. The science guide does not adequately illustrate instructional coherence consistent with college- and career-readiness standards in each grade.

Key Feature 4: *A curriculum explicitly articulates standards-aligned expectations for student work at different points during the school year.*

The curriculum guidance in each of the three content areas reviewed did not provide any indication of what student performance was likely to be at various points within the school year in any of the standards (or groups of standards). The district relies on the adopted textbook or online materials as the main guide for determining content and depth of teaching. And for science, specifically, the guidance is simply a listing of standards to be taught in each quarter without any detail of what to emphasize in a particular quarter (Grade 9).

Key Feature 5: *A curriculum contains scaffolds or other supports that address gaps in student knowledge and the needs of ELs and students with disabilities to ensure broad-based student attainment of grade-level standards.*

The curriculum guidance does not suggest how teachers can address gaps in student knowledge or provide scaffolding to support ELs and students with disabilities in learning grade-level standards in any of the three content areas. In several grade levels, teachers are directed to the Teacher's Edition of adopted textbooks to determine the type of scaffolds and differentiation needed during the unit, which presumes that the textbook includes quality and up-to-date guidance on scaffolding. Teacher selection of a specific scaffolding or differentiated strategy may create inequities across student groups and inconsistent approaches between classrooms and

schools, especially given the reported lack of professional development around effective instructional strategies for teaching ELs.

Key Feature 6: *A curriculum includes written links to adopted textbooks or computer-based products to indicate where the materials are high quality, where gaps exist, and how to fill them to meet district expectations.*

Specifically, the curriculum guidance references adopted textbooks or online resources, but there are no annotations of what teachers will find in them. Also, there is no guidance on where the teacher will need to augment the materials or which areas might be skipped. The district's curriculum guidance (Grade 9 Science) essentially leaves teachers on their own to search for resources and materials to use during instruction, leading to inconsistent selections within and across schools.

Key Feature 7: *A curriculum provides suggestions for the best ways to measure whether students have met specific learning expectations.*

The curriculum guides in all three content areas provide minimal information on the level of performance expected or few suggestions on how teachers are to determine whether students have met specific learning expectations. Leaving teachers to determine both the expectations and how to measure them will likely result in high variability across schools and classrooms.

In summary, the curriculum of the district was poorly defined and left teachers with inadequate guidance to teach students to the standards that the state and school system have adopted. Even if all the other EL-specific issues described in this report were solved, it would still leave ELs—and all other students—subject to a weak instructional program that has been made more incoherent by the district's pursuit of site-based management.

***School-level Observations*.** The team's findings at the school level are derived from both school visits and interviews with administrators and school leaders. The findings focus more on the overall coherence of instructional programming in schools and the level of support provided to school leaders in designing and staffing for coherent EL instruction.

- School leaders pointed out the difficulty in maintaining consistent programming from grade to grade, given changes in the make-up of qualified teachers. In one year, ELs in certain grades could be receiving bilingual education, but as they move up to the next grade, they might be placed in an ESL program due to teacher certifications.
- Consequently, school leaders described their EL program models according to the types of classrooms they had (e.g., one bilingual, two regular education, and one bilingual/special education) rather than by program models with a coherent pathway towards English language proficiency. In another school, a list of classes included multiple self-contained special education classes with ELs, who received ELD services *via* pull out.
- Administrators were consistent in wanting more days for professional development and greater decision-making authority to hire and place teachers.
- School leaders (and teachers alike) were concerned about the inability to effectively communicate with EL parents due to language differences and translation needs that go

unmet. Front office staff were typically not bilingual, and union contract provisions prevented the hiring of needed staff due to seniority restrictions.

- Common planning time for EL teachers was limited to one hour per week, during which teachers prepared for ACCESS testing.
- School site visits by the team and interviews indicated that some schools using Summit Learning did not provide ESL classes, leaving teachers to create their own scaffolding and materials for ELs.

Classroom observations. During classroom visits, the Council team saw a wide range of instructional practices for serving ELs.[46] These practices were not consistent across schools, even when (in name) the schools used a transitional bilingual education model. The team's observations include the following:

- Implementation of distinct ESL, transitional, and developmental bilingual models was not evident during the team's classroom visits or in program descriptions from school staff and leaders. In the bilingual models, staff struggled with the fidelity of an 80/20 and 70/30 model that called for specific language allocations throughout the school day.
- Learning objectives were not consistently rigorous or applicable to grade-level expectations. Teaching did not show evidence of connections between content and language objectives/intentions when both were displayed.
- Instructional supports for ELs were limited (e.g., few, if any, anchor charts or visual supports were visible, and teachers used strategies in isolation, out of context, or not connected to a framework or map of learning outcomes and expectations). Only one of the visited schools had a clear instructional map.
- Students were seen engaged in activities that were not connected to larger learning outcomes (e.g., using the Frayer model to build vocabulary–but removed from content learning).
- The team saw a wide variety of materials being used in different ways. In numerous cases, schools adopted programs to support implementation of a "standards bundle." School-level leaders trusted these programs to deliver appropriate instructional experiences and outcomes for all students, including ELs. However, teachers interviewed by the team did not feel sufficiently supported to implement the bundles or address language development needs. Furthermore, a review of resources provided through the programs found few meaningful supports embedded in the adopted materials to meet EL learning needs.
- The team saw a wide variety of instructional approaches, programs, and pedagogy stemming from school-based autonomy. Some of them went by the same names but were substantially different in practice. The school-by-school variation in instructional

[46] The team visited a total of 14 schools. Elementary Schools: Carl G. Lauro, Lilian Feinstein, Asa Messer, Leviton Dual Language, Reservoir Ave, George J. West, Anthony Carnevale. Middle Schools: Del Sesto, Roger Williams, West Broadway. High Schools: Central, Classical, Mt. Pleasant, and the Newcomer program.

programming results in a fragmented educational experience as students move from grade-to-grade or when students move between schools. For instance, some schools used personalized learning (e.g., Summit Learning), which some staff believed to be effective in providing Common Core-aligned materials, but staff could not articulate how English Language Development was supported when ELs were left alone for long periods on computers.

Moreover, central office staff indicated that three of the Summit Learning schools did not provide ELD. Other schools had dual language or maintenance bilingual programs in which native language (Spanish) was used for instruction during part of the day. Other schools visited by the team had data review cycles with students being monitored over six-week intervals, which treated EL instruction more like an "intervention" rather than a core, Tier I program.

- The dual language model was not described as a robust model of instructional pedagogy around biliteracy; school leaders described the program mostly based on its procedures and logistics: "ELs and Non-ELs learning side-by-side with students switching half-way through the day and rotating am/pm language cycles every five days." The program was essentially described as a maintenance model with a five-day rotation around American Reading Company materials. American Reading Company, nor its materials, constitute a dual language program *per se*, however. In addition, the team did not see much instruction informed by data during classroom visits. Students with whom the team spoke were unable to state their power goals and could only describe what would get them to the next level.

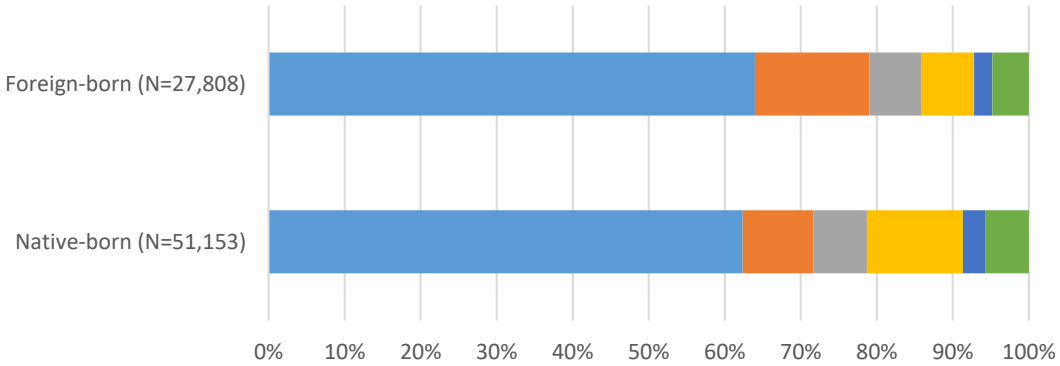
Parent concerns. The Council team met with about 20 parents who had children in more than eight PPSD schools, including two district charter schools. Most parents who attended the focus group spoke Spanish. Many were relatively new to Providence and were navigating U.S. schools for the first time. Several indicated that they had college degrees or had been teachers in their home countries. Parents had children who ranged from kindergarten to young adults who were at the university. Together, they could speak to the entire K-12 experience in Providence schools. Parents were articulate and expressed considerable appreciation for the education their children received. When asked by the team about specific challenges they faced, parents raised the following issues or experiences:

- Understanding the school choice process was difficult. Most parents indicated having challenges after not being assigned their first-choice school, especially when the resulting assignment was far from home or the assignments split siblings between schools.
- Transportation was a commonly mentioned challenge. Many parents indicated they did not qualify for transportation, and others were not sure about the process to qualify. Parents, therefore, faced transportation challenges in picking-up children or attending to school matters:
    - One parent indicated that his children needed to take two buses to attend school.
    - Another woman indicated that she lost her job due to transportation-related difficulties in getting her child to school.

- Grade retention troubled several parents. Some parents were notified late in the year, or a month before school started, that their child would be retained for the next year; four parents indicated this happened when their child was in kindergarten. At least two of the children were receiving special education services (e.g., speech therapy). Parents felt they had no recourse, for the school had not alerted them soon enough to help their children.
- Parents with students in special education were grateful for the services but unclear about progress made by their children.
- Several parents indicated that front office staff in schools were not helpful or welcoming, especially when parents did not speak English. Similarly, some parents indicated that teachers needed professional development on how to speak with parents and understand their child.
- An overwhelming number of parents (15 of 20 parents or over 75 percent of those present) indicated they wanted their children to have access to dual language programs in which their Spanish language would continue to develop. Parents affirmed that they saw their children develop better in dual language programming and that these programs helped to facilitate their children's language and cultural adjustment to schools and the U.S.

The Council reviewed U.S. Census data from the American Community Survey to shed additional light on the transportation issues the team heard about during the visit to Providence. We examined data from the *Means of Transportation to Work for Workers Aged 16+* report in 2017 for Providence, using two variables to understand the transportation resources available to EL families: a) nativity (U.S. native-born/foreign-born, and b) language spoken at home. The data showed that when comparing native-born to foreign-born workers aged 16 and older, foreign-born workers were more likely to carpool to work (15.1 percent versus 9.3 percent for native-born) but just as likely to use public transportation (6.8 to 7.0 percent among native-born). In other words, foreign-born workers ages 16 and older were less likely to have their own vehicles compared to U.S. native-born residents. Foreign-born workers would likely be the parents of English learners enrolled in Providence Schools. (See Figure 20.)

Figure 20. Means of Transportation to Work for Workers Aged 16+ by Nativity in 2017

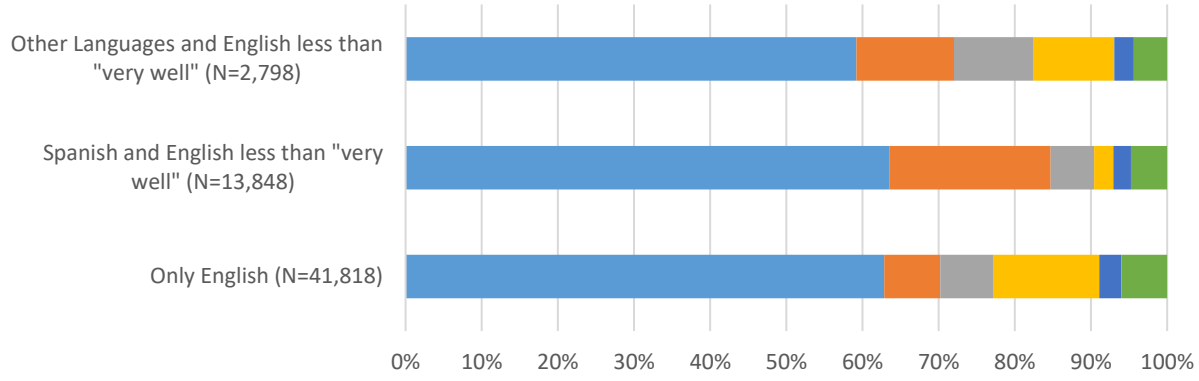


	Native-born (N=51,153)	Foreign-born (N=27,808)
Car, truck, or van - drove alone	62.4%	63.9%
Car, truck, or van - carpooled	9.3%	15.1%
Public transportation (excluding taxicab)	7.0%	6.8%
Walked	12.6%	7.0%
Taxicab, motorcycle, bicycle, or other means	3.0%	2.4%
Worked at home	5.7%	4.8%

Source: 2013-2017 American Community Survey 5-Year Estimates

The second variable focused specifically on EL families. The data showed that workers aged 16 and older who speak Spanish at home and speak English "less than very well" were three times (21.1 percent) more likely to carpool to work compared to workers of the same age who spoke English at home (7.4 percent). Typically, ELs come from homes where a language other than English was spoken at home. Consequently, the data displayed in Figure 21 confirm what the team heard from the EL parent focus group—transportation was a challenge. This situation was further corroborated during the team's site visit when an overnight snowfall prior to our second day resulted in accumulation that kept many students at home. The team witnessed a drastic drop in attendance due to inclement weather and unreliable access to transportation.

Figure 21. Means of Transportation to Work for Workers Aged 16+ by Language Spoken in 2017



	Only English (N=41,818)	Spanish and English less than "very well" (N=13,848)	Other Languages and English less than "very well" (N=2,798)
Car, truck, or van - drove alone	62.8%	63.6%	59.2%
Car, truck, or van - carpooled	7.4%	21.1%	12.8%
Public transportation (excluding taxicab)	7.0%	5.7%	10.4%
Walked	13.9%	2.5%	10.7%
Taxicab, motorcycle, bicycle, or other means	2.9%	2.3%	2.6%
Worked at home	6.0%	4.8%	4.4%

Source: 2013-2017 American Community Survey 5-Year Estimates

Scheduling EL services. Like other school districts across the nation, PPSD staff indicated facing challenges in creating master schedules that ensured ELs received required language instruction and supports while not missing out on grade-level content instruction. PPSD staff indicated this challenge was closely tied to the shortages of EL-certified teachers and EL seats. The situation was exacerbated by the number of Providence teachers who had ESL certification but elected NOT to teach ELs. Similarly, district staff mentioned to the team that some general education teachers indicated to teach ELs. As part of the DOJ Agreement, PPSD is required to create scheduling guidance documents for school-level leadership to ensure ELs receive the services to which they are entitled. The scheduling guidance documents created by PPSD in response to DOJ are a good start in conveying to principals and EL lead teachers the parameters for scheduling EL services.[47] The Council team believed, however, that the guides could be expanded to include samples schedules and guiding questions and elements to help principals and EL Coordinators in creating more viable schedules at their sites.

High school course offerings. The Council's review of several Providence high school websites showed significant differences in the amount and depth of information on course offerings. At

[47] District-provided Placement and Scheduling Guidance example, page 67

one end, Classical High School had a clearly and easily located list of course offerings that included nine math courses, of which four were AP and two were advanced. None appeared to be 'remedial' math courses.[48] Similarly, its listing of science courses totaled 11, of which six were AP classes, and none were 'remedial' or 'general science' classes.

At the other end of the spectrum, several high schools did not have a list of courses on their websites or, at best, they linked to the district's program of study (course offerings) website—a Google Drive folder, which was not user-friendly.[49] Central High School, for example, was a school that linked to the district's course catalog for SY 2018-19, but provided no information on the location of course offerings. From the SY 2017-18 course catalog, it was evident that not all schools provided the same opportunities for advanced course-taking to ELs or anyone else.

For instance, the SY 2017-18 course catalog indicated that AP Calculus AB was offered only at E-Cubed, Classical, Hope, Central, and Providence Career & Technical Academy. Except for Central, these schools enrolled smaller portions of ELs. Assuming no new sites were added for AP Calculus AB in SY 2018-19, only 44 percent of all ELs in Providence Public Schools would have been able to access this course at their school.

ELD courses at the high school level included a substantial array of course combinations and possibilities–each with a unique course number. Though there were three ELD courses with distinct course numbers, there seemed to be 35 course numbers that combine ELD with specific ELA courses–*and* each is designated for EL students scoring at specific WIDA levels. (See related recommendation #23 through #25 in streamlining ELD course numbering).

Finally, the SY 2017-18 course catalog shows that the district offered a substantial number of courses with less traditional names, mostly at schools with high percentages of ELs (e.g., Central, Sanchez, Mt. Pleasant, etc.). Interestingly, a course titled "Next Generation Science" was listed in multiple course catalogs. Assuming no change in SY 2018-19, the course was only available at Alvarez, where 59 percent of its student body is composed of ELs. Based on the course description, it is unclear whether the "Next Generation Science" course was comparable to typical science courses like biology and chemistry, or whether it was recognized for credit by colleges and universities.

Similarly, it was unclear to the team whether the courses offered at the Newcomer Center were equivalent to courses in the comprehensive high schools, and whether they would allow students to earn credits towards high school graduation.

Participation in college preparation assessments. Policies related to the participation of ELs and the allowable EL accommodations for the PSAT and SAT have changed as the result of the Rhode Island ESSA Accountability Plan. Rhode Island requires districts to use the SAT to measure achievement at the high school level to meet federal accountability requirements, and the

[48] Providence Public School District. (2018). Classical High School 2017-2018 course offerings. Retrieved July 19, 2019, from https://www.providenceschools.org/cms/lib/RI01900003/Centricity/Domain/97/course%20offerings%2010.1.18.pdf

[49] Providence Public Schools. (2019). HS program of studies 2018-19 SY. Retrieved July 19, 2019, from https://drive.google.com/drive/folders/0By05dhC1pVhZdXU2Wnc4dGMyVWc

College Board has expanded EL supports offered to all ELs taking the SAT. Together, these changes can result in expanded opportunities high school and more accurate assessment of what such ELs know, especially if PPSD educators support ELs and their families in making important decisions about participation and accommodations.

- *PSAT.* The team learned that while in previous years all students could take the PSAT, schools are now given the discretion to ***exclude*** newcomer ELs from taking the assessments. While this may make sense for students who are entirely new to U.S. schools and have minimal English proficiency, this practice—if not closely monitored—could result in too many ELs not participating in this valuable opportunity that exposes them to the SAT-format for testing as well as valuable information on their skills and knowledge.
- *SAT.* Under ESSA, ELs who are newcomer students—with less than one year in U.S. schools—can be exempted from ELA for one year, (i.e., only take the math part of the SAT). This exemption, however, results in a non-reportable SAT score for college admission.[50] For newcomer ELs with beginning levels of English and limited formal schooling, the one-year exemption from ELA is understandable, and even advisable. For newcomer ELs with intermediate or advanced English proficiency and prior schooling, the non-reportable SAT scores would be a drawback, especially if the student does not have the resources to take the SAT multiple times. A PPSD flier for ELs and their parents contains information about allowable accommodations for the SAT, but the complexities and reporting implications will require further explanation from PPSD staff to help ELs and their parents make informed decisions about using accommodations. Moreover, the team was concerned that the information currently in the flier may dissuade some ELs from using the extended time accommodation. Specifically, the PPSD flier states that,

  > "If you choose to use this SAA: You will have to test for the entire amount of extra time; you cannot leave early just because you have finished a test section."

  This language mirrors that found on the RIDE website:

  > "Students will receive 50% extended time on each section of the SAT. Students must sit for the entire time allotted and cannot go ahead in the test, or stop testing, even if they are the only one testing."

The team was concerned that students might opt out of the 50 percent extended time given the RIDE and PPSD-requirement to "test for the entire amount of extra time." The Council, however,

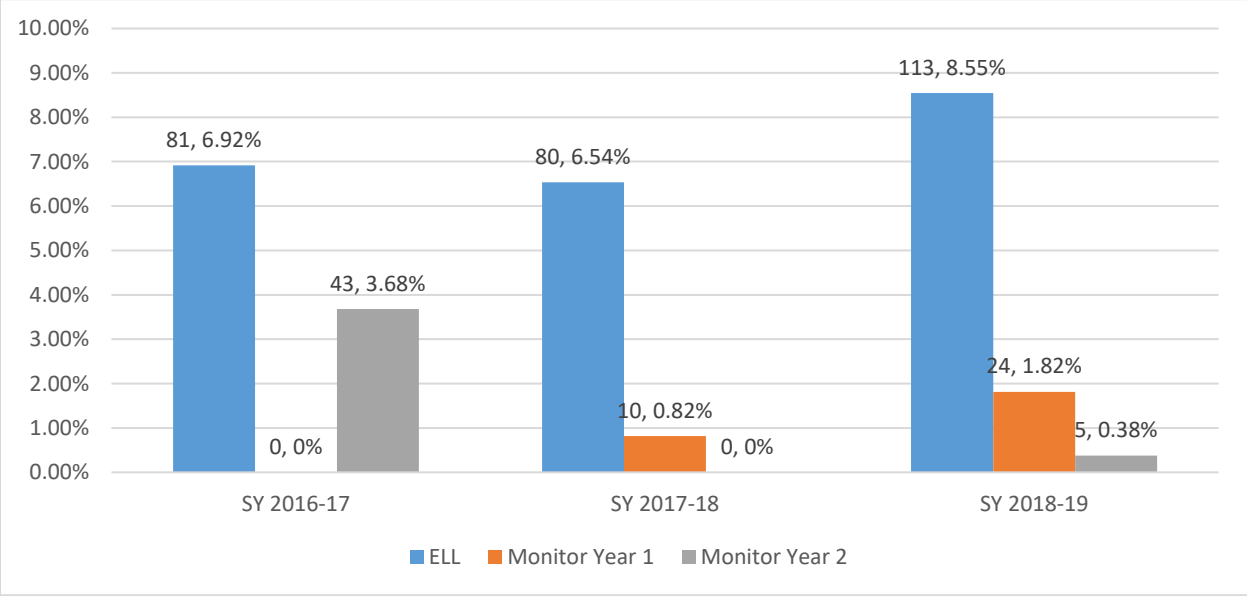
[50] As described by The College Board, the SAT is a comprehensive assessment that is not designed to be administered as separate sections in isolation. Therefore, students must take the full test to maintain test validity for all students, and thus receive scores reportable to colleges and universities. In the case of Rhode Island as well as other states in which newcomer ELLs can be exempted from the ELA/Reading portion, the SAT scores would not be reportable to colleges and universities. For an example of another state's policy, see https://www.cde.state.co.us/assessment/guidance-administeringcoloradopsatsafirstyearintheusell.

was unable to find similar language in the College Board's description of Testing Supports for English learners.[51]

Access to Specialized Programming and Advanced Courses

Providence schools have made some progress with screening practices and tools that can expand EL access to selective schools, but district staff indicated they were still concerned about the low numbers of ELs enrolled in accelerated and gifted programming. (See Figure 22.) Since the 2012 Council report, PPSD has begun using the Naglieri Nonverbal Ability Test to screen for gifted students. This screening instrument, as described by Pearson, "provides a nonverbal, culturally neutral assessment of general ability ideal for diverse student populations."[52] The district is also testing students in Arabic, Hindi, and other languages to grant foreign language credit, a recommendation also included in the 2012 report. The Council, however, did not request or review data to gauge participation or success rates.

Figure 22. Number and Percentage of ELs Participating in One or More Advanced Placement (AP) Course by EL Status, SY 2016-17 to SY 2018-19



Source: District-provided data

District-provided data show that Classical High School, the district's highly selective and highest performing secondary school, enrolls very few ELs. In part, this is due to the school's not providing EL support or ELD classes for students who are EL or formerly EL and who are, otherwise, doing well in content areas. The Council's review of the admissions process on the school's website suggests additional potential reasons why EL numbers at Classical are low: (1) the entrance criteria, including two admissions tests are only in English, suggesting that academic

[51] College Board. (2019). Testing supports for English learners. Retrieved August 16, 2019, from https://collegereadiness.collegeboard.org/educators/k-12/english-learner-supports

[52] Pearson. (2019). Naglieri Nonverbal Ability Test: Second Edition. Retrieved August 7, 2019, from https://www.pearsonassessments.com/store/usassessments/en/Store/Professional-Assessments/Cognition-%26-Neuro/Gifted-%26-Talented/Naglieri-Nonverbal-Ability-Test-%7C-Second-Edition/p/100000287.html

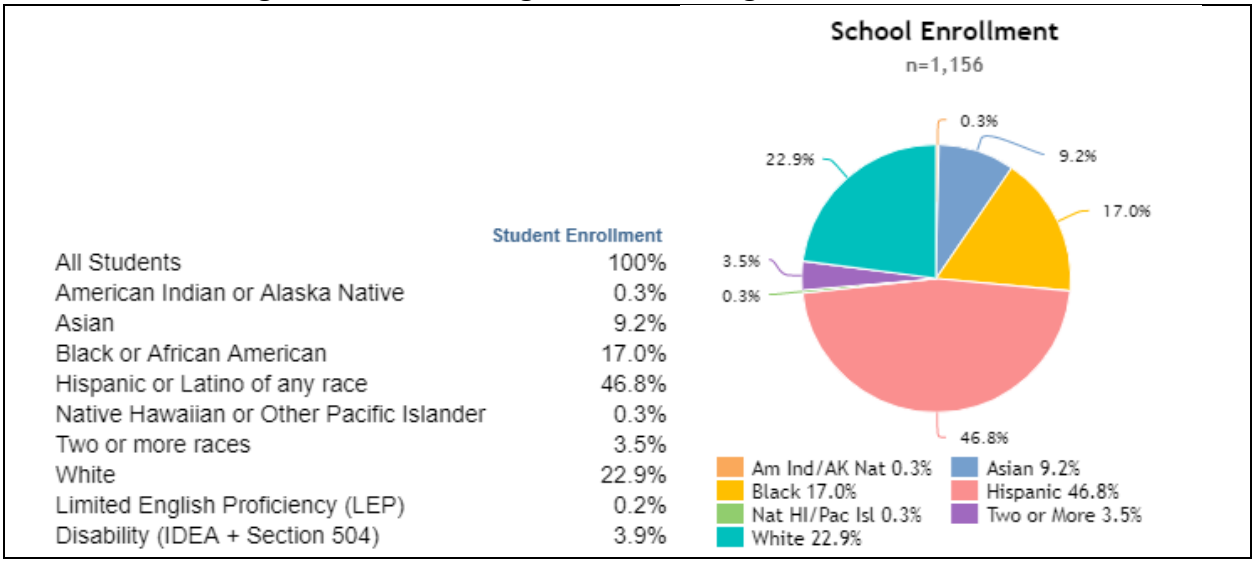
ability could not be expressed in a language other than English, (2) the composition of the school selection committee might not include staff with experience or knowledge of ELs or English language acquisition, and (3) middle schools were not referring ELs to Classical High School. In an interview with the Council team, a staff member expressed puzzlement about how the 2019 class president from Classical "did it," knowing she arrived in Providence at the age of 10 knowing no English. The comment suggested that expectations for such students were typically low.

Older data (2015) from the Civil Rights Data Collection of the U.S. Department of Education showed that students of color enrolled in Classical High School appeared to have very different experiences and outcomes. (See Figure 23.) Data from 2015 show that while Hispanic students represented 46.8 percent of enrollment at Classical, they made up 62.5 percent of students retained. Black students were 17 percent of school enrollment, but they were 12.5 percent of those retained and 25.9 percent of those with out-of-school suspensions. Additional examination of these data by local officials is warranted to better understand the reasons for these outcomes. In addition, further examination of data is warranted to better understand the differences in the percentages of White, Black, and Hispanic students who participate in college pathway courses at Classical:

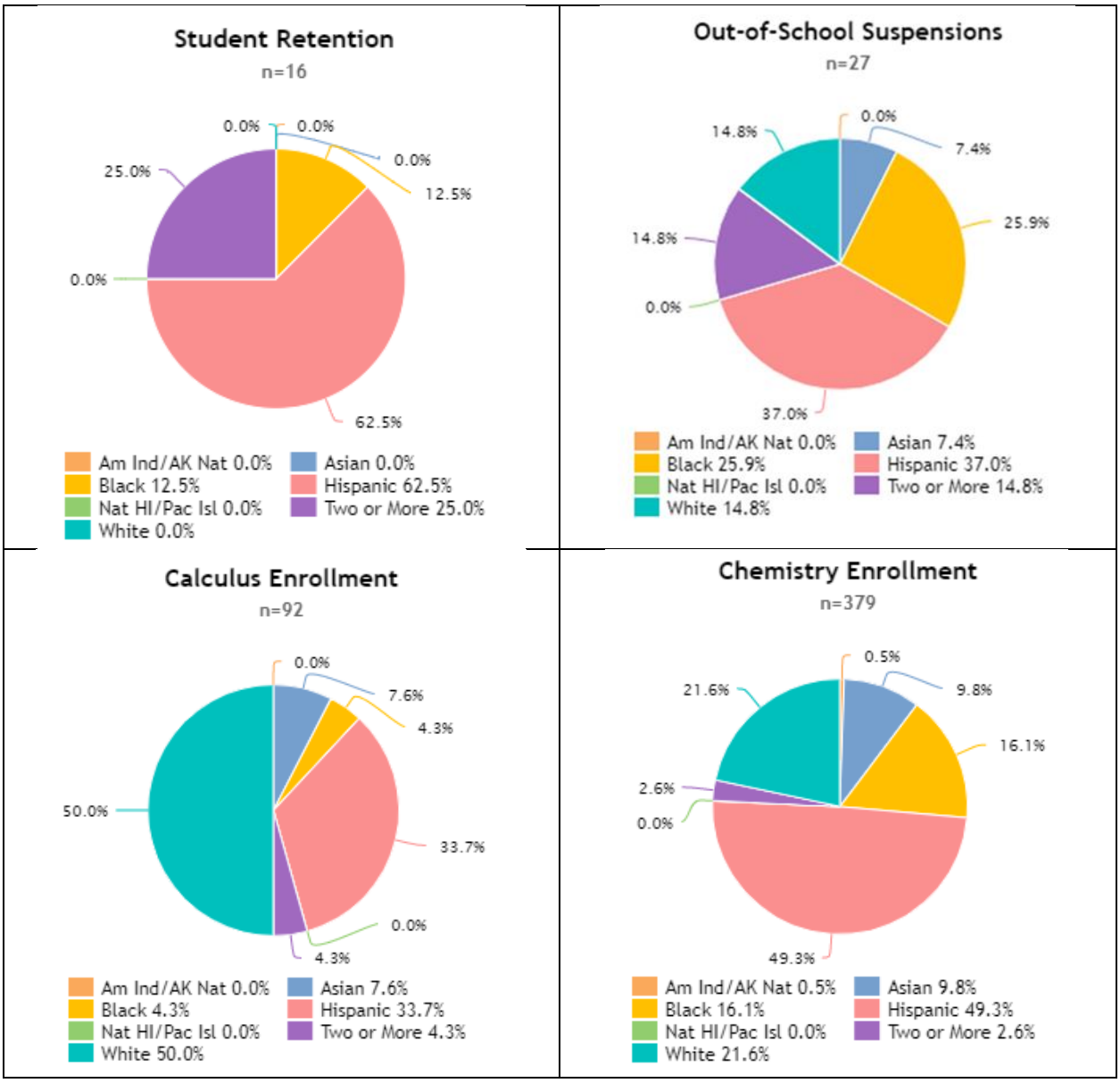
- The percentage of White students who took Calculus and participated in the SAT/ACT exams for college entrance was *double* their share of total enrollment.
- Hispanic students participated in Calculus and the SAT/ACT at a *slightly lower rate* than their share of enrollment and at *similar levels* taking Chemistry and Physics.
- Black students saw the greatest disparity in taking Calculus—*less than half* their share of total school enrollment but similar percentages in Chemistry, Physics and in the SAT/ACT.

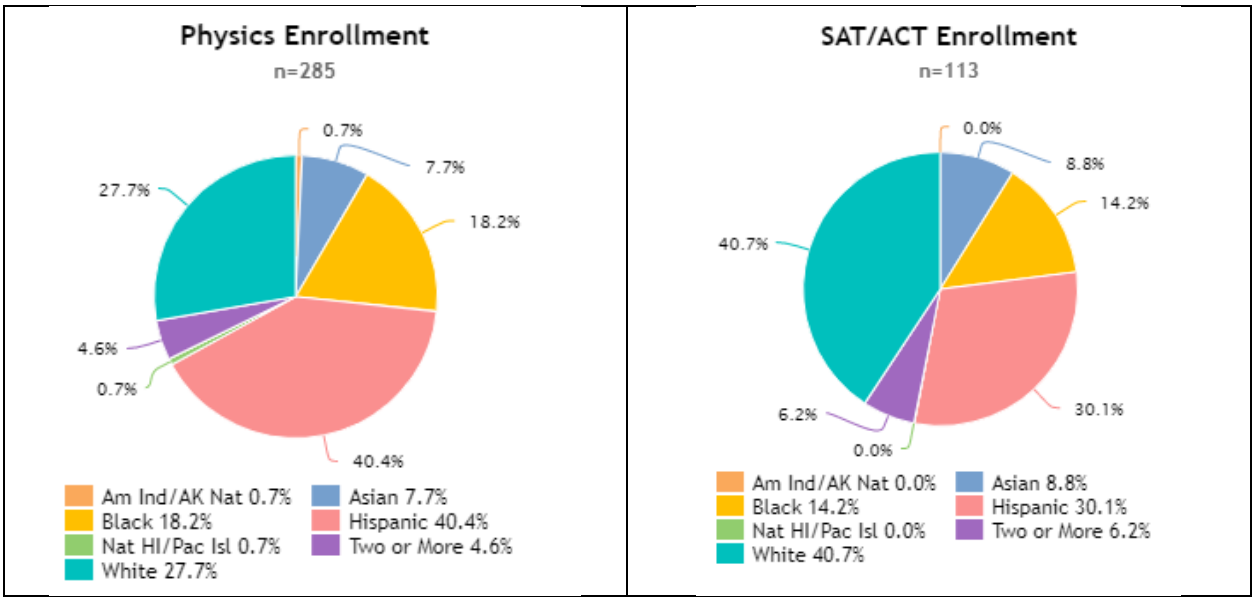
The Civil Rights Data Collection did not show other participation rates at Classical due to the low numbers enrolled.

Figure 23. Classical High School Civil Rights Indicators, 2015



	Student Enrollment
All Students	100%
American Indian or Alaska Native	0.3%
Asian	9.2%
Black or African American	17.0%
Hispanic or Latino of any race	46.8%
Native Hawaiian or Other Pacific Islander	0.3%
Two or more races	3.5%
White	22.9%
Limited English Proficiency (LEP)	0.2%
Disability (IDEA + Section 504)	3.9%


Student Retention
n=16
0.0%
0.0%
0.0%
12.5%
25.0%
0.0%
62.5%
Am Ind/AK Nat 0.0%
Asian 0.0%
Black 12.5%
Hispanic 62.5%
Nat HI/Pac Isl 0.0%
Two or More 25.0%
White 0.0%
Out-of-School Suspensions
n=27
0.0%
7.4%
14.8%
25.9%
14.8%
0.0%
37.0%
Am Ind/AK Nat 0.0%
Asian 7.4%
Black 25.9%
Hispanic 37.0%
Nat HI/Pac Isl 0.0%
Two or More 14.8%
White 14.8%
Calculus Enrollment
n=92
0.0%
7.6%
4.3%
50.0%
33.7%
0.0%
4.3%
Am Ind/AK Nat 0.0%
Asian 7.6%
Black 4.3%
Hispanic 33.7%
Nat HI/Pac Isl 0.0%
Two or More 4.3%
White 50.0%
Chemistry Enrollment
n=379
0.5%
9.8%
21.6%
16.1%
2.6%
0.0%
49.3%
Am Ind/AK Nat 0.5%
Asian 9.8%
Black 16.1%
Hispanic 49.3%
Nat HI/Pac Isl 0.0%
Two or More 2.6%
White 21.6%



Source: 2015 Civil Rights Data Collection

Data provided by PPSD also show that in SY 2018-19, of the 1,089 students enrolled at Classical, only eight were either EL or former ELs (monitored year 1 and 2) and comprised less than one percent (0.7 percent) of all students in the school. (See Table 13.)

Table 13. Number and Percentage of Students Enrolled in Classical HS by EL Status, SY 2018-19

	Count	Percent
Monitor Year 1	1	0.1%
Monitor Year 2	1	0.1%
Current EL	6	0.6%
Non-EL	1,081	99.3%
Total	**1,089**	**100.0%**

Source: District-provided data. Description from Skyward as of 11/1/18.

Credit Recovery. The Council team did not hear of any particular process or effort to provide ELs with access to other specialized programs for school completion. Access to such programs is often contingent on a referral process through which students are identified as being "off track," but staff did not elaborate how this was defined for ELs. Staff described the credit recovery programs as offering 'night school' at which EL supports are available in multiple languages for work on an online platform. The elements sounded promising for ELs who wanted to advance in their high school course completion. The Council, however, was unable to review these elements in any greater depth; and no further information or general descriptions were found on the school district's website. The lack of additional information in readily available form about the credit recovery program and referral process were seen by the team as hurdles for ELs in need of credit recovery opportunities.

Instructional Materials and Resources

Since the Council team's visit to Providence, the EL Office has conducted a DOJ-required inventory of existing materials used for EL instruction to determine gaps and needs related to specific content areas and grade levels. This task was particularly cumbersome given each school's discretion in purchasing materials with "tools of the trade" funds. The team saw evidence that schools had heavily relied on supplementary materials that appear to be randomly selected and unrelated to learning targets and the curriculum (course of study).

Providence Public Schools made some $300,000 in funds available in SY 2018-19 for instructional materials to support EL instruction. By the end of June 2019, the EL Office selected and purchased materials for elementary and secondary schools, but the effort was time-pressed to comply with the DOJ Agreement. The Council team expressed concern with the accelerated and seemingly unilateral selection of materials for ELs that may not actually meet their instructional needs.

Program Design and Instructional Delivery

The EL program in Providence Schools is not defined as a program *per se*, and none of its documents or staff indicated that all schools had the responsibility of providing quality grade-level education to ELs. Instead, the EL program in Providence Public Schools was generally described according to the type of ESL or bilingual education students received. These descriptions were generally shaped by the number and placement of ESL-certified teachers but not by any coherent instructional design around the progression of English language acquisition, any expected time for achieving proficiency English, or any well-established and stable program models from which EL parents could choose. At the secondary level, in particular, the lack of a coherent English course sequence was troublesome since it left ELs without the ability to accrue credits for high school graduation. This was especially troubling at the newcomer program, which was serving students who were of high school age and had considerable ground to cover in order to earn high school credits. The Council also reviewed the revised *Sheltered Strategies Look for Tool*, that PPSD developed in response to DOJ requirements. The Council found that, in its current form, the tool was unhelpful because its long list of strategies is not clearly linked to a coherent vision for ELs, nor are the specific strategies seamlessly mapped onto or embedded in the district's Keys for Learning and other instructional initiatives.

DOJ Agreement. Given the absence of a coherently designed instructional program for ELs in Providence Public Schools, the findings of the DOJ review were no surprise. The DOJ's remedies require much-needed investments and improvements to the instructional program for ELs (e.g., teacher certification, minimum periods of ELD, materials, professional development). However, Providence schools still need to build a broad and coherent program that conveys to EL parents and to ELs themselves what they can expect from participating in an EL program, including a seamless progression toward English proficiency and high school graduation that leaves them prepared for higher education and careers.

The recommendations provided in the next section focus on developing a coherent, systemwide program for ELs that results in assuring ELs access to quality, grade level instruction and provides EL parents with meaningful and viable choices of English-development instructional models. In

developing the recommendations for instructional models and pathways to graduation, the team incorporated the DOJ-specified requirements for ELD.

As noted in the enrollment section of this report, most ELs in PPSD come from Spanish-speaking homes, and there is growing interest in dual language program models, as noted by staff who indicated that all dual language programs had waiting lists. During the team's focus group discussions with parents, nearly all expressed interest in having their children becoming biliterate in Spanish and English. The Council's recommendations are responsive to parents' expressed interest.

Recommendations

In this section, the Council provides recommendations on improving the curriculum, refining EL program models, and improving EL access to the district's specialized programs, including selective schools and credit recovery. Most of the recommendations focus on the design and implementation of EL program models.

EL Program Models

Establishing quality EL programming across the school district is an urgent matter, given that ELs comprise over one third of all students in Providence. The Council team's recommendations include two distinct levels of implementation: ***one*** is at a systemic level, which calls for establishing quality EL programs in all schools to maximize access to such services, and the ***second*** is at the classroom level, which calls for improved instructional practices and expectations for ELs. Both sets of recommendations are situated within a larger effort to improve instructional quality and accountability in PPSD.

Ideally, every school should be prepared and staffed to offer EL services to any EL. Each zone in PPSD should offer a full set of models for English language development to ensure that any EL could opt to attend a school near home. Resource constraints and the actual distribution of ELs across the schools, however, calls for a strategic allocation of resources to maximize access to EL services. In cases where ELs are too few to support full-time assignments, itinerant teachers and staff might be deployed within the zone.

The district currently offers seven options for EL programming (four ESL and three bilingual), but these programs do not represent distinct models *per se*. Instead, the programs are differentiated by both instructional model and student placement. The Council recommends PPSD re-cast its EL program to include only a few, highly effective models that provide core curriculum to all ELs.[53] All new EL program models would meet the three-prong Castañeda test: (1) be based on a sound educational theory, (2) be implemented effectively with sufficient resources and personnel, and (3) be evaluated to determine whether they are effective in helping students overcome language barriers. Having a select few models that are supported by strong evidence would allow the district to better focus its resources on these programs and better support principals and teachers implementing them. In addition, a few select programs would be more understandable to parents and could be more effectively monitored for quality. Moreover, the district could

[53] At the time of the Council's visit, PPSD offered seven programs–Newcomer, Sheltered Instruction, Integrated ESL, EL Collaborative, Transitional Bilingual, Developmental Bilingual, and Dual Language.

establish school-based professional learning communities that were better focused on a few models than trying to implement too many. Finally, ELs who move between schools would have a more coherent educational experience across fewer models than the larger set currently offered inconsistently in PPSD.

The Council suggests that rather than conceptualizing EL services by their discrete 'hours' or 'periods' of English language development or sheltered instruction, PPSD would be better served by developing a well-conceived instructional framework for ELs, grounded in research, integrated into broader efforts to improve instruction, and coherent in its pathways to English proficiency and high school graduation. The EL instructional framework or blueprint would encompass the DOJ-specified requirements for ELD and sheltered content instruction, and it would be based on principles and elements outlined in items 20 through 22.

20. Charge the EL Office with leading a working group of EL practitioners and staff from core content areas to develop the district's EL framework and ensure that the English Language Development courses/instruction meet the demands of the Common Core. The design of all EL instructional models should be aligned to college- and career-readiness standards. EL programs should include rigorous instruction in content areas, academic language development, and meaningful interactions to develop English proficiency and conceptual understanding. For further elaboration of these principles, see a *Framework for Raising Expectations and Instructional Rigor for ELs,*[54] which outlines a re-envisioned English Language Development (ELD) approach to meeting the language demands of the Common Core State Standards. Specifically, the Council team recommends that the Providence framework include the following two essential components.

    Focused Language Study: *A dedicated period during the day for focused instruction on how English works, providing ELs with an understanding of the basic structures of languages for a variety of registers needed to engage in academic discourse and learning across all content areas.* This element is like the DOJ-specified requirements for ELD and ESL and would be provided by teachers with ESL/Bilingual certification. English Language Development (ELD):

    - ELD involves the systematic development of English across the four language domains of listening, speaking, reading, and writing. Effective program components should include how ELD instruction supports ELs to use English purposefully, to interact meaningfully at school and beyond, and to be knowledgeable about English in order to use it with precision in conveying exact meaning in communicating and learning.
    - ELD blocks and courses should allow for flexibility for student acceleration and should link to other courses to provide broad learning opportunities and a cohesive program.

    Discipline-specific Academic Language Expansion (DALE): *The development and expansion of academic English across the school day with all teachers (regardless of content or subject area) and integrated into all subjects or courses.* This instruction might be provided by

[54] Council of the Great City Schools. (2017, May). Re-envisioning English language arts and English language development for English language learners. Retrieved from

bilingual education teachers, general education teachers with required competencies to explicitly address academic language development within the content areas, or co-taught with content and EL-authorized teachers. Implementing a DALE component into EL instructional programming amplifies the DOJ-specific requirement for sheltered content instruction, as DALE calls for developing academic language across the curriculum.

Content area instruction is coupled with academic language development with these two components. *Academic language development* is provided to ELs through content-based instruction to develop their English competencies throughout the school day. And *Sheltered English instruction* in content areas is taught by bilingual or ESL teachers with subject area certification or by general education teachers with ESL endorsements or who have had substantial professional development in building academic English and making content accessible to ELs. Finally, for long-term ELs who have been in the school system for more than five years, targeted academic supports should be identified through the MTSS process.

21. Charge the EL Director with leading a working group to re-define EL program models along three specific dimensions:

    a) *Purpose, goals, and outcomes***.** Academic achievement is an assumed goal in all models. Each model is defined by its specific purpose with respect to the acquisition of English language proficiency and the development of a student's home language.

    b) *Grade levels and students served.* Program models would be offered at particular grade level, with ESL offered at all grade levels and bilingual/dual language programs offered at grades K through 5. Specifying the students served would allow PPSD to plan for EL services following DOJ guidelines linked to the English proficiency level of ELs.

    c) *Instructional delivery.* Models should be clear about the particular features of instructional delivery, such as language of instruction.

    Specifically, we recommend articulating the district's EL program using two general categories defined along its instructional features: **ESL** and **bilingual/dual language education.** Each of the models have unique features, but all provide ELs with access to quality instruction in content areas and lead to ELs becoming proficient in English.

    - **ESL and Sheltered Content Instruction in English**. ESL programs should provide at least one daily period of English language development targeted on students' English proficiency level and sheltered content instruction taught by ESL certified teachers. In this model, all instruction is delivered in English, whether in a sheltered or push-in class. The goal of this program would for students to meet grade-level content standards and become proficient in English within three to four years in the program, depending on their initial English proficiency. This EL program model would be available at all grade levels and open to all ELs, regardless of home language or level of English proficiency. Depending on the number of students in each school who are enrolled in an ESL program, and the number of ESL-qualified teachers, the setting in which ESL is provided would be one of the following:

- *Self-contained (currently called Sheltered) ESL*—Classes that are composed of all EL students for core content and ELD. Schools should make a concerted effort to create schedules that integrate ELs with more proficient ELs and fluent English speakers, lest the school create linguistic isolation that is detrimental to ELs and in violation of Title VI of the Civil Rights Act.
- *Integrated ESL*—ELs are clustered to represent no more than 50 percent of a class taught by an ESL-certified teacher.
- *EL Collaborative*—ELs with higher levels of English proficiency receive ESL from an ESL-certified teacher, and core content instruction is provided in general education classes taught by general education teachers trained in EL strategies.

In addition, the *newcomer program* is a choice open to ELs with limited formal education or interrupted education. Parents can select this program in which their child would be enrolled for one year (or up to 2 years in specific situations), after which time they would move into one of the other EL programs that best fits the student's educational pathway. The courses comprising the newcomer program at the high school level should clearly demonstrate how credits are earned to ensure students graduate college- and career-ready.

- **Developmental Bilingual/Dual Language Education.** This category includes two models, both of which use Spanish as the language of instruction in selected content areas. Both models include literacy development in Spanish and in English and content area instruction in either language or both, depending on the school's model. The goal of dual language programs is for students to meet grade-level content standards and become biliterate by grade 5, assuming students started in kindergarten or grade 1. Both models already exist in PPSD. We recommend, however, that the Transitional Bilingual program be phased out, with students moving into either the Developmental Bilingual (DBE) or the Two-way Immersion program.
    - *Developmental Bilingual*—this program is also known as the One-Way Dual Language model. Consistent with the description found in PPSD documents, ELs in this program would receive instruction in Spanish, starting at 90 percent of the day in kindergarten, decreasing each year until students receive 50 percent in Spanish and 50 percent in English in grades 4 and 5. Participating students would likely be all ELs.
    - *Two-way Immersion*—In this program, Spanish is the language of instruction for 50 percent of the day, starting in kindergarten and remaining so until grade 5. Depending on the interest of English proficient (Non-EL) students, the enrollment of the school could be up to 50 percent Non-EL.

Elementary-level EL Program (Grades K-5)

Table 14 below outlines our suggested program features. The suggested programs would, initially, only be offered in grade K-5, because EL numbers are highest in these grades and staffing for content instruction in Spanish in middle and high school is more challenging. The

school district can determine later, say after three to five years, whether to offer a dual language strand or school at the middle school level. The Council team heard many parents express interest in enrolling their children in a dual language program; and staff indicated there were waiting lists in the few schools that offered such programming. Existing Transitional Bilingual programs would lend themselves to being transformed into Developmental Bilingual programs. Parents who decide not to have their children participate in a Developmental Bilingual or Two-Way Immersion program would enroll them in the ESL program.

Table 14. Program Model Goals and Articulation

	ESL & Sheltered Content Instruction in English	*Dual Language*	
		Developmental Bilingual Education	***Two-way Immersion***
Purpose & Outcomes	• College- and career-readiness • ELs become proficiency in English	• College- and career-readiness • ELs become proficient in English • ELs develop academic proficiency in their native language	• College- and career-readiness • ELs become proficient in English and develop academic proficiency in their native language • Non-ELs acquire an academic proficiency in a new language
Students	English learners in a range of settings: self-contained or clustered with Non-ELs	English learners primarily	English learners and up to 50 percent non-English learners
World Language Articulation	• World Language Exam to receive a Silver Seal of Biliteracy • High school credit for World Languages by exam	• Gold Seal of Biliteracy of Rhode Island for high school graduates who have attained an Intermediate-mid level of proficiency or higher in listening, speaking, reading, and writing in one or more world languages, and have mastered English for academic purposes. • High school foreign language credit in Grade 8	• Gold Seal of Biliteracy of Rhode Island for high school graduates who have attained an intermediate-mid level of proficiency or higher in listening, speaking, reading, and writing in one or more world languages, and have mastered English for academic purposes. • High school foreign language credit in Grade 8 and credit by exam in Grade 9

The instructional features of each of the EL program models are described in Table 15 below, including student composition, the language of instruction in core content areas and the respective time allocations for each partner language, the grade levels at which each model is offered, and program participation details.

Table 15. Program Model Instructional Delivery

<table>
<tr><th></th><th rowspan="2">ESL and Sheltered Instruction in English</th><th colspan="2">Dual Language</th></tr>
<tr><th>Developmental Bilingual Education</th><th>Two-way Immersion</th></tr>
<tr><td>General Structure of the Model</td><td>Students are taught in English throughout the day, using effective instructional strategies.</td><td>ELs are taught in and through English and their native language.

Students learn language arts in both English and the partner language, properly scaffolded based on standards and language progression for each respective language. <u>ELD for ELs must be an explicit part of the English language arts instruction.</u>

Subject areas are taught in both languages, meeting the Common Core State Standards, irrespective of language of instruction.</td><td>Both EL and Non-EL student cohorts are taught using English and the partner/native language as the language of instruction.

Students learn language arts in both English and the partner language, properly scaffolded based on standards and language progression for each respective language. <u>ELD for ELs must be an explicit part of the English language arts instruction.</u>

Subject areas taught in either of the partner languages would meet the Common Core State Standards.</td></tr>
<tr><td>Language Allocation for Instruction</td><td>English is the primary language of instruction.</td><td>90/10 Model
Beginning in K, when ELs are entering with minimal English proficiency, the model calls for 90 percent of instruction to be delivered in Spanish.

In K, instruction is mostly delivered in the native language and 10% in English. By Grade 4, the language allocation should reach the target goal of 50 percent in English and 50 percent in Spanish, continuing on through grade 5.

<table><tr><th>Grade</th><th>E/S</th></tr><tr><td>K</td><td>10/90</td></tr><tr><td>1</td><td>20/80</td></tr><tr><td>2</td><td>30/70</td></tr><tr><td>3</td><td>40/60</td></tr><tr><td>4</td><td>50/50</td></tr><tr><td>5</td><td>50/50</td></tr></table></td><td>50/50 Model
Starting in K, half of the instructional time is delivered in Spanish and half in English. This 50/50 distribution on the language of instruction would remain the same up through Grade 5.</td></tr>
<tr><td>Grade Levels</td><td>All grades</td><td colspan="2">K-5/6 (elementary level)</td></tr>
<tr><td>Program Participation</td><td></td><td>Parent commitment that their child remains in the program over time is requested to optimize program benefits.
Spanish-speaking ELs can enter at any grade level.</td><td>Parent commitment that their child remains in the program over time is requested to optimize program benefits. Students would typically enter at Kindergarten or Grade 1. Spanish-speaking ELs and others with demonstrated Spanish proficiency may participate at any grade level.</td></tr>
<tr><td>Exiting from EL Services</td><td>ELs exit the program when they reach proficiency in English.</td><td colspan="2">ELs would exit from the LEP status when they meet the English proficiency criteria, but this change in status would not require them to leave the dual language programs. In fact, the school would prefer the student remain in the program.</td></tr>
</table>

Using the program model instructional delivery table above, the EL Director would map onto the various models, student assignments, and teacher qualification requirements per the DOJ Settlement Agreement. It would then serve as a guide for schools, registration staff, Zone Executive Directors, and school leaders. Student placement by English proficiency level and teacher qualifications required for instruction would result in (a) a coherent instructional approach to English language development and content learning for the students, and (b) sustainable EL program models for PPSD. (See Appendix E for Sample Student Assignments and Teacher Qualifications across EL program models.)

22. Charge the EL Office with creating a guidance document for establishing additional DBE or DL programs. The dual language programs would be offered in two models: DBE/one-way and DL/two-way programs based on the share of students who are ELs and English-proficient (either native English-speakers or initially identified as proficient in English, based on the EL screener). The Council team recommends that PPSD initially implement the dual language program models only up to grade 5 (or grade 6 if there are K-6 elementary schools) to ensure that they are solidly implemented to provide grade-level content with qualified teachers and quality instructional materials in both Spanish and English. Guidance for the design and implementation of these programs would likely include—

    a. selection of models based on school demographics and parental preferences—DBE, DL (one-way, two-way);

    b. selection of subject areas that would be taught in each language, considering the availability of materials, qualified staff, and instructional support;

    c. instructional time to meet sample language allocations—e.g., the amount of time native language is used to teach subject-area content would depend on the model's expected language allocation ratio;

    d. selection of instructional resources;

    e. district-selected assessment or portfolio evidence to formally recognize biliteracy and grant foreign language credit in high school; and

    f. ongoing professional development and instructional supports.

Secondary-level EL Program (Grades 6-12)

The Council's recommended program for grades 6-12 is an ESL and Sheltered Content EL program model. At the middle school level (grades 6-8), the EL program centers around ensuring ELs have access to grade-level content and academic English so they are well-prepared for high school. At the secondary school level (grades 9-12), the model centers around creating viable EL pathways to graduation.

Middle school articulation and rigor. EL placement in middle school courses may pose fewer challenges than in high school, but it will still require concerted and coordinated efforts to assign ELs to classes that are rigorous, even if their English is still developing. Content in middle school becomes more rigorous for all and so does the use of academic language. ELs should be assigned to these classes and provided ELD supports to develop the academic

language needed for grade-level content. Efforts will also be required to find the time for ELD classes and additional supports without depriving ELs of participating in such enrichment opportunities as STEM classes, orchestra/band, theater, world languages, or Algebra I in grade 8. Finally, the articulation of EL-assigned classes should lead to high school pathways for graduation. For instance, since the lowest level of math in high school is typically Algebra I, middle school offerings and placements for all students—not just ELs—should prepare students to complete Algebra I by the end of grade 9. Otherwise, students will likely not be able to participate successfully in advanced math courses in high school, thereby adversely affecting college admissions and career opportunities.

EL program configuration in high school. Creating standardized EL program configurations at the high school level is not always feasible because of the many subject areas, graduation requirements, shortages of EL-certified secondary teachers, and numbers and types of ELs in each school. An important goal, however, is to have ELs enrolled in appropriate ELD courses with access to ELA with course numbers that represent a distinct course–with clear course descriptions, outcomes, curriculum, resources and materials. The course numbers should not represent the 'type of EL' enrolled in each class. Consequently, samples of EL program configurations that meet the needs of ELs in grades 9-12 within DOJ parameters would be helpful to principals, counselors, and teachers in developing master schedules and student-specific pathways. Sample EL program configurations represent secondary schools with low EL enrollments as well as those with high EL enrollments with a range of English proficiency levels. In order to create these configurations and viable pathways to graduation, the Council recommends the following:

23. Charge the Chief Academic Officer with creating a *Secondary Schools EL Working Group*, led by the EL Director and Executive Directors of middle and high school zones and composed of practitioners from secondary schools, middle and high school principals, counselors, EL coordinators/coaches, and EL specialists. This working group would develop clear descriptions of optimal middle school and high school courses and pathways that ensure articulation across grades and schools and access to credit bearing courses leading to on-time graduation. Middle and high school pathways would align across levels. And high school courses and pathways would consider graduation credits, transcripts, and other factors that promote college- and career-readiness.

24. Charge the *Secondary Schools EL Working Group* with redesigning the high school ELD courses and number designations that include ELD courses for beginners, intermediate, and advanced students. Identify lead teachers and other staff knowledgeable in ELD, ELA, and high schools to assist with ELD course redesign. Each course should be well-defined with standards, expected student outcomes along a progression of English development, and include curriculum and designated student and teacher resources and materials. Specifically, we recommend using course numbers: High School ELD 1A, 2A, 3A for Beginning, Intermediate, and Advanced ELD, respectively.

25. Simplify student placement and related course numbers and credits by using course numbers for specific ELA courses that clearly show courses taken and credits earned on transcripts. Do not use the complex ELA/ELD course numbers that combine ELA course with student ELP level

(e.g., 9th for Levels 2-3, or 1 and 2, etc.), as these numbers do not describe the actual course, but rather, the students enrolled in the course.

Group ELs in appropriate ELD and ELA courses. ELs appropriately placed in ELA or other content courses should receive scaffolds needed to be successful in that course. Track student enrollment in ways that do not affect transcripts, graduation, or college entrance. For example, tag EL students on class rosters, master schedules, etc., to determine courses in which ELs are clustered. Data reports can then be generated showing content courses in which ELs are enrolled and ELA courses in which ELs are receiving embedded ELD.

26. Charge the *Secondary Schools EL Working Group* with determining what type of high school credits will be earned through each of the ELD and ELA high school courses and combination of courses, if applicable, and solicit final approval from RIDE. Questions to be answered include:

    - What credits are earned for HS ELD 1A, 2A, and 3A (e.g., ELA or elective ELD)?
    - What credits are earned if taking both a designated ELD course (e.g., HS 1A, 2A, 3A) and an ELA course?
    - What credits are earned if a student is taking an ELD course, embedded in an ELA course? (ELA graduation credit, elective, or both?)
    - How do they contribute to graduation requirements?
    - How are credits displayed on student transcripts?

    Explore the possibility of applying one year of core-English graduation credit for HS ELD 3A—the highest ELD course. Many districts already apply one year of core-English credit (graduation/college entrance-bearing) to their highest level one-year-ELD course. Students may apply this high-level ELD course toward one of the four years of required English credit.

27. Charge the *Working Group* with developing guidelines for middle school placement and pathways with attention to course numbers, course sequences, and ELD course redesign as described for high schools above.

28. Charge the *Working Group* to work with the Office of Multiple Pathways and the EL Director to create customized pathways of course sequences for newcomer/SIFE students. All courses needed for graduation and college entrance should be included over a four-year period (five for students entering as newcomers or SIFE). The course sequence, however, should vary from the general course sequence for ELs entering school at the high school level. For example, newcomers or SIFE students would benefit from taking ELD and specific core courses that are not as linguistically demanding and/or would lend themselves to progressing toward English language development (e.g. science, theatre, art, P.E.) during their first year in a U.S. school. More linguistically demanding courses would be taken in subsequent years, when ELs have had the opportunity for more English language development. Intentionally adjusting the course sequence by "front-loading" these electives and specific core courses promotes student success from the start. Too often ELs fail core courses due to English

proficiency, requiring them to retake the courses, undermining their self-confidence as successful learners and serving as barriers to graduation and college entrance.

29. Charge the *Secondary EL Working Group* with examining the content and rigor of all courses for ELs at beginning levels of proficiency, including newcomer and SIFE students, to ensure that the additional scaffolds provided to meet grade level language demands do not compromise or undermine grade-level content. This that will allow students to successfully transition into their core, credit-bearing courses, and thereby maintain articulation of the course sequence.
30. Charge the EL Office with developing a guidance document that schools could use for proper student placement and pathway articulation to upper grades for ELs entering in middle or high school to ensure that they graduate college- and career-ready. The guidance would—
    - Show pathways, which could be customized from a traditional high school path, for students entering schools with varied prior education (and credits) and English proficiency levels.
    - Show well-aligned ELD and content courses to promote student success. For example, students entering as beginners in English language proficiency and placed in Beginning ELD (1A) should not (simultaneously) be placed in a credit-bearing ELA high school course such as British Literature, if the latter course is taught at the level of proficiency of native English speakers without EL support. (Refer to Appendix F for an example of a *High School Placement and Pathway* document from San Diego Unified School District. A similar document was also developed for the middle school level.)
31. Charge the EL Director to work with Zone Executive Directors in the middle and high school zones to vet all high school course names and numbers through high school representatives, counselors, and others (including high school cross-departmental team) prior to finalizing new names and numbers that could affect student opportunities and college acceptance. These changes would need approval by RIDE. Vetting would be done to identify unintended consequences of program participation, programming, graduation, or college entrance. For instance, some courses or course names might limit student opportunities for advanced courses, electives, CTE, or other programs, and some colleges might not accept credits for all courses identified as "sheltered." High schools should submit courses to groups such as NCAA and the College Board for review.
32. Provide World Language opportunities at the middle school level and include them in the high school graduation pathways in a way that will acknowledge home language as an asset—and use this asset to meet World Language graduation (and college entrance) requirements. Provide all ELs the opportunity to fulfill this proposal with the following:
    - *Exams.* Develop a process accessible to all ELs, in as many languages as possible, to meet requirement through examination. Explore with local communities and colleges opportunities to expand language options and establish processes.
    - *AP Spanish language class and exam*. Encourage Spanish speakers to enroll in AP Spanish Language and take AP exams. Offer AP Spanish Language at all high schools. This also gives

students a boost for college entrance and enhances one of the key assets they bring to school, language.

- *Other world language courses.* Allow (but don't require) ELs to enroll in a world language, (including Language for Native Speakers) for those who wish to take a world language course in high school.

System-level Recommendations

As Providence Public Schools embarks on a systemwide effort to improve instruction, the Council recommends including the following steps in enhancing the curriculum guides:

33. Charge the Director of Curriculum and Instruction with leading a team that includes the EL Office to conduct a careful review of the curriculum guide. Have them build out concrete guidance and exemplars for teachers and ensure that suggested activities and texts address the level of rigor and expectations contained in the standards, are culturally relevant, and respectful of students in PPSD. The augmented curriculum guides would likely include—

    - Going beyond the Rhode Island state standards by adding requirements that would be of specific interest to PPSD students, would engage their understanding of complex issues, and would develop logical and critical thinking.
    - Well-written guidance that provides a concrete way for teachers to take a state standard and conduct a deep dive into it rather than a superficial look at a series of standards.
    - Guidance on implementing culturally responsive teaching by promoting justice and honoring the dignity of all students in PPSD whose make up is a sharp contrast to that of Rhode Island as a whole. In Providence, 80 percent of students are racially and/or ethnically diverse, while in Rhode Island diverse students comprise 44 percent.

34. Charge the Director of Curriculum and Instruction with forming a working group that includes staff from the math and EL Office to augment the math curriculum guide to include the following features:

    - *Vocabulary Development.* A focus on simplified vocabulary and word-level instruction is not effective in building EL students' capacity to productively engage in grade-level mathematical discussions. The interdependence of language and mathematics described below is applicable to any content area. Dr. Judit Moschkovich states, "Language is a socio-cultural-historical activity, not a thing that can either be mathematical or not, universal or not." She further states, "'The language of mathematics does not mean a list of vocabulary or technical words with precise meanings, but the communicative competence necessary and sufficient for participation in mathematical discourse."[55] In the area of mathematics, this means that the language of a math classroom needs to expand beyond talk to consider the interaction of different systems involved in

[55] Council of the Great City Schools. (2016, December). *A framework for re-envisioning mathematics instruction for English language learners*. Retrieved from https://www.cgcs.org/cms/lib/DC00001581/Centricity/domain/4/darrell/FrameworkForMath4ELLs_R10_FINAL.pdf

mathematical expression (i.e., natural language, mathematical symbols/ systems, and visual displays).

- *Mathematical Practices.* The curriculum guides for mathematics would benefit by adding concrete examples of standards for mathematical practice in each grade level. *The Elaborations of the Standards of Mathematical Practice* for grades K-5[56] and 6-8[57] developed by Illustrative Mathematics would be helpful for the PPSD curriculum team to add specificity to their curriculum documents.

35. Charge the EL Office with developing a guide or handbook articulating the features and expectations of EL program models explicitly supported by PPSD. These models would help school leaders understand the features of programs they would be responsible for developing and sustaining in their schools. The handbook would also be important for the Registration Office when making student placement decisions. A parent-friendly handbook translated into the district's top languages with relevant information on program features, the expected progress of students, and ultimate outcomes would also be helpful to parents and should be widely dissemination by the Parent Engagement Office during registration.
36. Charge the Chief Academic Officer and EL Office with jointly reviewing curricular resources adopted by schools to implement "standards bundles" and determine what training on EL scaffolding techniques and instructional design would be helpful in spurring EL achievement.
37. Charge the lead of the Zone Executive Directors to work with the EL Office and the city office responsible for planning to identify areas where EL families speaking specific languages live in order to project where EL programs might be placed in corresponding zones and neighborhood schools.
38. Charge the EL Office, the Zone Executive Directors, along with the Parent Engagement and Human Resources Offices with creating a map of schools that indicates specific locations of EL program models. The goal would be to have each zone offer a full range of EL program models, relative to its EL population and parental preferences. These EL program models would be clearly marked in publicly accessible documents about all Providence public schools to help parents make program and school selections.
39. Recommended schools for each type of program model would be based on an analysis that includes:
    - An inventory of qualified teachers (with ESL or bilingual/dual language certification)
    - An assessment of relative school capacity and buy-in to serve ELs—conducted by the EL Office
    - A mapping of parent preferences for different types of EL program models, co-developed by the offices of ELs, Registration, and Parent Engagement

[56] Illustrative Mathematics. (2014, February). *Standards for mathematical practice: Commentary and elaborations for K–5*. Retrieved from http://commoncoretools.me/wp-content/uploads/2014/02/Elaborations.pdf
[57] Illustrative Mathematics. (2014, May). *Standards for mathematical practice: Commentary and elaborations for 6–8*. Retrieved from http://commoncoretools.me/wp-content/uploads/2014/05/2014-05-06-Elaborations-6-8.pdf

- A mapping of transportation services to schools in the respective zones corresponding to pockets where EL families reside
- A distribution of ELs enrolled in schools and EL families in neighboring attendance areas, by language spoken at home

40. Charge the EL Office to work with the Multiple Pathways Office to review the potential barriers ELs face when trying to access credit recovery programs or class schedules that they need to complete their high school credits on time. The Office of Multiple Pathways and EL Office should develop sample schedules and criteria that make the alternative course pathways available to all high school ELs. These pathways would provide additional opportunities for ELs to complete courses through late afternoon or evening classes and summer courses. These opportunities would help ELs accrue high school credits to make up time devoted to ESL electives and would expand course-taking opportunities for students who enter secondary school at older ages. Some of these courses could be placed at the newcomer program in order to provide additional and more flexible opportunities for students. The district might wish to look at the *Accelere* program established in the Omaha Public Schools that provides students with additional options to complete high school while juggling other obligations.[58]

School-level Recommendations

41. Charge the EL Office to work with Zone Executive Directors to ensure that school leaders assign staff to support EL academic growth at the high school level in strategically selected content areas. Given the heterogeneity of ELs in grades 9-12, the large number of subjects, and the shortage of ESL-certified secondary teachers, the EL working group for secondary schools might consider creating sample school staffing models that strategically assign ESL-certified teachers to high school content areas that are a priority for EL graduation. Assigning EL teachers to provide supports across content areas and grade bands is unrealistic, making it difficult to maximize EL services. When considering how to use ESL teachers to provide supports in content areas at the secondary level, we recommend—

    a. Creating EL support teams by content area for entire grade spans. For example:

        - High school EL support teachers would support a specific content area (or areas), such as math or science, for grades 9-12 (or grades six through eight in a middle school). They would support students and co-teach with teachers-of-record in classes where ELs are clustered. This would not include self-contained sheltered content classes for ELs at Levels 1 and 2, as these classes require an EL-certified teacher or teacher-in-track to obtain EL-certification.
        - EL coordinators/coaches could focus on certain content areas and be shared across schools. For example, an EL coordinator in one school might specialize in history and

[58] Omaha Public Schools. (2019). Accelere. Retrieved August 16, 2019, from https://multiplepathways.ops.org/Accelere/tabid/89/Default.aspx#63561-term-schedule

social sciences while another might focus on science and math. These coaches could be shared between two schools.

b. Establishing clear expectations for how teachers-of-record and EL teachers who push into the classroom would work together, with the understanding that the teacher-of-record (general education) would be responsible for EL achievement with the support of the ESL teacher.

c. Incorporating samples of what it would look like to integrate ELs at Levels of 4 and 5+ into ELD scheduling each day to ensure placement with qualified teachers in core content classes and to minimize linguistic isolation.

42. Charge the school leadership team with developing master schedules and staffing systems based on the projected number of ELs for the subsequent year. Program/place ELs first, clustering them in appropriate ELD and content courses (including sheltered content for specific ELs) staffed with EL-certified (or in-training) teachers in order to identify projected needs for certified teachers in various subject areas.

43. Charge school leadership teams with including EL coordinators in the implementation of school and district initiatives that address the needs of ELs.

Instructional Materials

44. Charge the Chief Academic Officer with assigning staff to work with the EL Office in reviewing the materials inventory prepared by the EL Office for DOJ and maintain a joint inventory. Classify materials according to content areas and specify whether they are resources for ELs and are used for newcomers, ELs in grades K-5, or grades 6-12.

45. Charge the Chief Academic Officer with establishing a cross-disciplinary working group, led by the EL Office, to establish non-negotiable criteria by which materials for ELs are utilized and/or procured. The criteria should be centered around providing ELs (including newcomers) with access to grade-level content and meeting their needs for English acquisition and academic language development. Criteria developed by the Council of the Great City Schools can provide important elements.[59]

46. Charge disciplinary teams working with the EL Office to review the existing inventory of materials against the non-negotiable criteria to determine which materials to keep, which to cease using, and whether the materials are for core instruction, supplemental instruction, or intervention with ELs. Curtail the discretion that principals have to acquire materials. It is important to share with them the results of the materials review and provide ongoing professional development on the use of materials that meet specified criteria. Ensure that schools halt purchasing materials that are not aligned to rigorous state standards or use outdated approaches to ELD.

[59] Council of the Great City Schools. (2017, May). Re-envisioning English language arts and English language development for English language learners. Retrieved from

47. Consider the adoption of programs that meet the needs of newcomers aligned to higher state standards (i.e., are not based on low expectations). One such program is the Project Bridges SIFE Project out of the City University of New York (CUNY).[60] PPSD could explore a partnership with Brown University, which has also done work in this area.[61]

48. For grades K-5, assemble a team of educators and outside experts to review and select materials for implementation in fall 2019. The team may wish to look at online and open source materials and build the ESL curriculum around these. Some examples are *Open Up Resources*[62] and *EL Education*.[63]

    The PPSD team might also look at materials that have been assembled by other districts with newcomers. For example, consider the LAUSD list of resources available on their website. [64]

49. Create a team to review and select materials for dual language instructional programs that focus on biliteracy and cross-linguistic transfer. Schools offering dual language programming might wish to jointly purchase the materials.

D. Staffing and Professional Development

Findings

During the Council's visit to PPSD, the team had an opportunity to speak with staff, including teachers, EL coordinators, EL coaches, and principals. The team also met with the PTU president and the executive director of member services. The team learned about an innovative alternative ESL certification program developed by Providence Schools in partnership with Roger Williams University. The team was glad to hear that the district was investing in the program to partially cover the $4,000 program fee.

In addition, the Council team heard a recurring set of concerns, needs, and challenges related to meeting the needs of ELs in PPSD. Some of the most prevalent were:

- Teachers wanted support with learning about effective strategies to teach ELs and wished to see how such strategies worked, and they wanted to see what implementation looked like in classrooms.

[60] City University of New York: The Graduate Center. (n.d.). Bridges to academic success. Retrieved August 8, 2019, from http://bridges-sifeproject.com/

[61] Walsh, C. E. (1999). *Enabling academic success for secondary students with limited formal schooling: A study of the Haitian literacy program at Hyde Park School in Boston*. Retrieved from Education Alliance at Brown University website: https://www.brown.edu/academics/education-alliance/publications/enabling-academic-success-secondary-students-limited-formal-schooling-study-haitian-lit

[62] Open Up Resources. (n.d.). English language arts curriculum. Retrieved August 28, 2019, from https://openupresources.org/ela-curriculum/

[63] EL Education. (n.d.). EL Education curriculum. Retrieved August 28, 2019, from https://curriculum.eleducation.org/curriculum

[64] Los Angeles Unified School District. (n.d.). *Instructional resources to support newcomers*. Retrieved August 20, 2019, from https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/22/newcomer%20resources.pdf

- Teachers wanted instructional supports that refrained from being implemented with a 'gotcha' approach.
- Teachers would find it helpful to have guidance for selecting materials and products to build out a curriculum beyond the standards bundles, as well as guidance for lesson planning to 'backwards map' from the standards bundles that were currently in place in lieu of a scope and sequence
- Teachers do not have curriculum or units, and thus, are writing their own curriculum with no supports or guidance. There was a need for materials, professional development, curriculum, and pacing guides that were coherent for ELs and for all students in PPSD.
- There were many teachers—estimated at 100—who had ESL certification but preferred not to be assigned to EL classes. Staff indicated that the differential pay is seen as insufficient for the work and the challenges related to teaching ELs. As a result, substitute teachers (without ESL credentials) are assigned to ESL classrooms.
- Teacher referrals of ELs to the MTSS process were met with resistance.
- There were no systemic or timely supports provided for students who have trauma, and school counselors have limited knowledge to make decisions on proper services for these students.
- Some teachers expressed the misconception that ELs cannot be given the same curriculum as non-ELs, and that math and reading curriculum should be different for ELs.
- Teachers were concerned about the student composition of their 26-student classes, namely not wanting too many ELs.
- Many ELs go underserved due to understaffed ESL positions, and many are pushed into different content area classes that are being taught by a general education teacher with no training on how to work with ELs.
- The ESL teacher shortage results in some classes having 36 ELs (10 over the 26-level specified in the PTU contract), while a general education classroom might have only 15 students, or a kindergarten teacher might be using an ACCESS text without an auxiliary teacher in the room.

Staffing-Hiring and Teaching Assignments

As of June 2019, staff indicated that there was a need for an additional 40 ESL-certified teachers. During interviews, the team heard of numerous challenges to hiring such teachers. Several hurdles stemmed from certification requirements by the Rhode Island Department of Education (RIDE). The team learned that:

- Teachers with bilingual and dual language teacher certifications cannot teach in *English as a Second Language* classes.[65] The Council's analysis of the 2018 adopted regulations confirms

[65] Many of whom, were likely hired to provide instruction in Spanish.

this understanding. Moreover, while dual language-certified teachers cannot teach in *English as a Second Language* classes, the regulations do allow for teachers with a certificate to teach English to Speakers of Other Languages (ESOL) to teach in dual language programs.[66]

- Staff considered the SAT/ACT requirements for entrance to teacher education programs to be a hurdle to potential teachers.
- Rhode Island's lack of reciprocity makes it difficult to hire teachers from neighboring states, such as Massachusetts.

RIDE 2019 teacher certification regulations. The Council's research revealed some positive developments at the state level in Rhode Island. Rhode Island adopted new teacher regulations that became effective June 2019 that include reciprocity provisions that will make it easier for teachers from Massachusetts and Connecticut to work in Rhode Island.[67] In addition, the Rhode Island Department of Education is giving districts more time to help teachers with emergency certifications get certified in shortage areas, and more specifically related to ELs, establishes an EL endorsement that teachers can obtain on a certification. The additional requirements, however, may translate into immediate hurdles for PPSD to meet its need for qualified teachers of ELs. Specifically, the new regulations require:

- increased practical experience for teacher candidates—from a 12-week student teacher experience to full-year teacher residency or equivalent
- annual professional learning for the re-certification of teachers: 20 professional learning units (PLUs) for existing teachers and 30 required for new teachers applying for initial certifications

Through these regulations, the Rhode Island Board of Education sends an important message about the need for better-prepared teachers in the state. At the same time, the additional practical experience and professional development requirements will come at a cost to aspiring teachers and school districts who need additional state support immediately.

Teacher demographic profile. The teacher workforce in Providence Public Schools is more representative of the overall demographics of Rhode Island than the demographic profile of Providence students. The disproportionality between White and Hispanic populations is almost a perfect inverse—whites are nearly eight times more likely to be in the teaching force than they are to be in the student body, and Hispanics are 8.5 times more likely to be in the student body than they are to be in the Providence teaching force. (See Figure 24.) Considering that the Rhode Island Department of Education has only three approved programs to provide ESL and/or bilingual certification[68]—Rhode Island College, Roger Williams University, and the University of Rhode Island—that are likely to attract regional (overwhelmingly White) candidates rather than

[66] Title 200, Chapter 20, Subchapter 20—Educator Quality and Certification

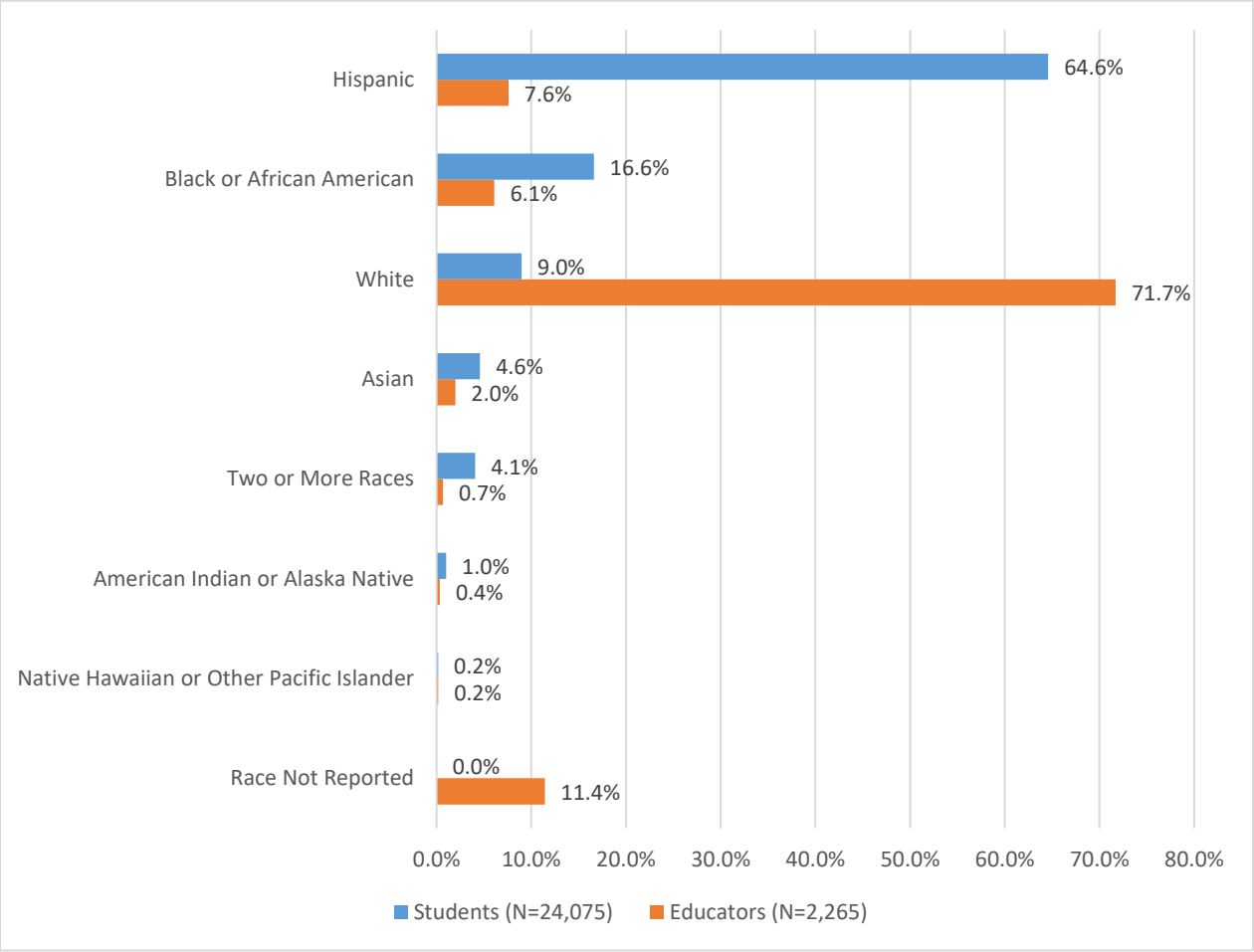
[67] Borg, L. (2019, January 31). Rhode Island College addresses teacher shortages with new requirement. *Providence Journal*. Retrieved from https://www.providencejournal.com/news/20190131/rhode-island-college-addresses-teacher-shortages-with-new-requirement

[68] Rhode Island Department of Education. (2019, May). Rhode Island approved programs. Retrieved from https://www.ride.ri.gov/Portals/0/Uploads/Documents/Teachers-and-Administrators-Excellent-Educators/Educator-Certification/Becoming-an-Educator/RI_Approved_Preparation_Programs.pdf

a more diverse national pool, the district and the state might consider greater reciprocity and a more aggressive national recruiting campaign.

Research is rapidly emerging showing the benefits of students having teachers that look like them and have a cultural affinity with them. The discrepancy is so large in Providence Public Schools and the challenges to recruiting and hiring teachers of color are so significant that the more urgent and expedient course of action may be for PPSD to invest in evidence-based practices and professional development that can build connections and bridges between the teaching force and students. An equity impact tool might be helpful for the district to use when designing and implementing new policies and initiatives to build bridges across racial and language divides and grow or attract teachers of color to PPSD. Appendix G provides a Racial Equity Toolkit used by the Seattle Public Schools, which can also be accessed online.[69]

Figure 24. Race/Ethnicity of Students versus Educators[70] in SY 2017-18



Source: Rhode Island Department of Education SY 2017-18 District Report Card for Providence

[69] Seattle Public Schools. (2019). Racial equity teams. Retrieved August 28, 2019, from https://www.seattleschools.org/departments/rea/rea_newsletters/race_and_equity_teams

[70] In Rhode Island Department of Education reporting, *educators* include building administrators, district administrators, support professionals, and teachers. Approximately 83 percent of *educators* in Providence are teachers.

Teacher assignments in schools. The Council team heard from several PPSD staff that current staffing protocols thwart the flexibility of re-assigning certified teachers to a different grade or placement within a school or to another school. The team saw during their school visits that staff came from numerous programs, including City Year and Teach for America. Some schools had *instructional assistants* in the classroom, while others did not. There was no indication that teacher recruitment efforts were centralized, given school autonomy, meaning that staffing and staff recruitment was mostly school-driven.

The Rhode Island Department of Education has a number of approved educator preparation programs.[71] Providence directly contracted with Teach for America—one of the state-approved programs—for recruiting and developing staff, but this contract does not prioritize recruitment of EL teachers.[72] RIDE has not approved TFA as an alternative preparation program for ESL or bilingual education.[73] In fact, only two universities in Providence—Roger Williams and University of Rhode Island—are approved by RIDE as alternative prep programs for obtaining a certification to teach ELs.[74]

District EL projections are not reliable enough for staffing and hiring purposes and do little to alleviate large EL classes. As noted earlier, the number of EL teachers assigned to each school is based on the number of ELs in attendance six months prior to the beginning of school year (January). As a result, staff indicated that the number is often an undercount not only in the current year but also in the upcoming year, since ELs continue to enroll throughout the period. The undercount leads to inaccurate projections that only exacerbate the existing shortage of EL-certified teachers, leaving some classes with as many as 34 students, as was reported to the team. The team learned that it would be possible to leave open seats or classes with fewer than 26 students to allow ELs arriving later in the year to occupy those spots. The team, however, did not hear from the budget office that this was a regular practice in PPSD. Even if a new teaching position opens to meet the demand of ELs enrolling mid-year, the team heard from multiple interviewees that the negotiated teacher contract is interpreted in a way that principals feel like they need to hire from the pool of excessed teachers first with secondary consideration to EL expertise. The team did not hear that there were any hiring priorities, beyond tenure, for individuals who had ESL-certification. This practice hamstrings principals from building a cadre of EL-related qualified teachers and sustains the current demographic makeup and qualifications of the teaching pool, with some principals choosing to leave the position open rather than fill it with a teacher not qualified to teach ELLs.

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[71] Rhode Island Department of Education. (n.d.). Educator preparation programs. Retrieved July 25, 2019, from https://www.ride.ri.gov/TeachersAdministrators/EducatorCertification/RIEducatorPreparationPrograms.aspx

[72] City of Providence. (2019, April). Procurement 22915. Retrieved July 25, 2019, from https://providenceri.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=22915

[73] Rhode Island Department of Education. (2016, October). *Review team performance report: Rhode Island College/Teach for America*. Retrieved from https://www.ride.ri.gov/Portals/0/Uploads/Documents/Teachers-and-Administrators-Excellent-Educators/Educator-Certification/PrepRI/PREP%20Reports/2016%20PREP-RI%20Final%20Report%20-%20RIC-TFA.pdf

[74] Rhode Island Department of Education. (2019). Educator preparation programs. Retrieved August 16, 2019, from https://www.ride.ri.gov/TeachersAdministrators/EducatorCertification/RIEducatorPreparationPrograms.aspx

Teacher preference sheets. The team also heard from many staff members that the current execution of teacher 'programming preference sheets' largely prohibits the reassignment of teachers to new courses or classes. Attorneys for PPSD, Zone Executive Directors, and central office staff with whom the Council team met repeatedly described the preference sheets as an almost ironclad agreement to assign teachers based primarily on their preferences, with most teachers choosing ***not*** to serve ELs. During the Council's visit, the team interviewed leaders of the Providence Teachers' Union and subsequently reviewed the latest teacher contract. Neither the discussions with the PTU leaders, nor our review of the contract, left the team with the same sense of rigidity that PPSD staff described the teacher preference sheets as having, but it appears that the sheets are being used more restrictively than what the language proscribes. The preference sheets for high schools and middle schools, specifically state that the sheets are provided to inform class assignments "as part of the needs-driven instructional assignment process." They make no commitment or promises that assignments will be made based only on preferences. The January 10, 2019 deadline for submitting preference sheets for the following school year is much too early to make accurate projections of student enrollment for English language instruction in the following year. However, the preference sheet does provide helpful information on which teachers are able and willing to teach an unassigned period (Article 8, Section 4-6 of contract).

Process and criteria for teacher assignments. The Council's analysis of the Providence teachers' contract clarified that while there are procedural steps around the 'preference sheets,' there was no clear prohibition on assignment to new courses. Article 8-4.6 of the teacher contract describes the steps required to establish additional teaching periods that would have teachers accepting classes during their unassigned period.[75] The steps make explicit reference to the subsequent school year without providing a timeline for additional classes or courses within the same school year. Article 13 of the contract clearly lays out the criteria and steps for making teacher assignments. Assignment decisions must be made on an educationally sound basis and must meet one or more of the four listed criteria.[76] The criteria are centered around priority areas that the teacher contract considers to be the 'driving force behind instructional assignments.' The Council team generally thought that these contract-specified priority areas aligned well with the DOJ Agreement related to serving ELs. The fourth criterion was expressly related to the preference sheets, maintaining "consideration of teachers' programmatic preferences, as communicated through their preference sheets."[77] A teacher's preference was, therefore, not the *only* criterion, nor was it listed as having greater weight. The contract stipulates that the processes for making needs-driven instructional assignments require transparency, objectivity, and professionalism on the part of all participants. This does not mean that the contract language is being faithfully executed, but it does suggest that the contract itself is not the problem.

Same year teacher assignment changes. Articles 13-2 and 13-3 delineate a course assignment process that, for the most part, applies to a subsequent school year. If the assignment change is

[75] Sept. 1, 2017 – August 31, 2020 Agreement Between the Providence Teachers Union AFT Local 058, AFL-CIO and the City of Providence p. 22
[76] Ibid. p. 44
[77] Ibid. p. 45

to occur in the same school year, principals are required to convene the Instructional Leadership Team (ILT) to review the request for change. It is not clear if the ILTs consider the four criteria specified in the contract in casting their deciding vote (simple majority). The Council team heard from numerous staff, however, that requesting same-year teacher assignment changes was rarely pursued due to the cumbersome process and poor record of securing ILT approvals. Union leaders highlighted additional concerns about mid-year assignment changes:

- at the elementary level when a new class was created, requests could result in changing the status of a resource teacher to a "teacher of record" and thus affect teacher evaluations
- as new students enter a classroom, they could affect the SLOs used for teacher evaluations
- at the middle and high school levels, existing teachers would need to teach an unassigned period, leaving these teachers with no prep period

Instructional coaches. Several staff emphasized during the interviews that there was a disparity between the number of math and literacy coaches (21 math and 22 literacy coaches in elementary schools) provided to schools and the number of EL coordinators/coaches that existed in schools. The disparity was also confirmed by the Council's review of job descriptions. While math and literacy coach positions are solely devoted to coaching responsibilities, EL coordinators are required to split their time between providing direct services to ELs, coaching teachers, and carrying administrative responsibilities for ELs (e.g. placements, assessment administration, etc.). EL specialists work in the EL Office and are assigned to work with schools and support Zone Executive Directors.

To reinforce EL coaching for teachers, the EL Office is adding an EL coordinator to each of the middle schools that would combine direct services to ELs and coaching for teachers—consistent with the six-hour day parameters of the teacher contract. It was unclear to the team if Title II funds or Title I SIG funds were supporting this expansion of coaching support.

Teachers credentials and experience. The Council team examined teacher and school administrator data on Providence Public Schools, which is publicly available from the Rhode Island Department of Education for SY 2017-18.[78] The data include the number of years of experience for both teachers and administrators, and the number of teachers teaching with an emergency/preliminary credential and/or assigned to teach a content area out of their field. Overall, the data showed that out of 1,781 teachers in Providence Public Schools, 14 percent of them (or 248) had less than three years of experience in teaching, and nine percent were teaching with an emergency or preliminary credential. In addition, nine percent were teaching out-of-field. (See Table 16.) For Rhode Island, the numbers of teachers teaching out of field were not the same as the those who had an emergency/preliminary credential, suggesting that some out-of-field teachers had teaching credentials. In the case of Providence, however, the number of teachers who were teaching out of field was the same as those on an emergency/preliminary

[78] Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher

credential. Because the categories are not mutually exclusive, Providence needs to determine whether teachers who have emergency/preliminary credentials are disproportionately teaching out of field, since the 1:1 correspondence of the two categories suggests that they are the same people. Research shows that teachers with less experience tend to be less effective, as is the case with teachers assigned to teach content out of their field.[79]

- *Building administrators.* Middle schools are known to be more complex than other grade spans because of the departmentalization of content instruction, the additional electives, the increasing rigor and complexity of content, and the physical, emotional, and mental development of students. Despite this, five out of seven middle schools in PPSD are led by administrator teams of which half or more had less than three years of experience.
- *Teachers.* A substantially greater share of new teachers (i.e., teachers with less than three years of experience) were assigned to middle and high schools in PPSD. This might be explained by the number of teachers not requesting middle or high school placements on their "preference sheets," seniority preferences, and/or a shortage of teachers in the secondary grades. Similarly, a larger number of schools at the secondary level had teachers who were teaching with an emergency or preliminary certification. Five out of seven middle schools had between 16 percent and 29 percent of their teachers with less than three years of experience, and three of these schools had between 14 percent and 28 percent who were teaching with an emergency credential.

  At the high school level, the teaching force at eight of 12 high schools had between 14 percent and 47 percent of their teachers with less than three years' experience, and four of these schools had between 13 percent and 22 percent of their teachers on an emergency or preliminary credential.

[79] Kini, T. & Podolsky, A. (2016). Does Teaching Experience Increase Teacher Effectiveness? A Review of the Research (research brief). Palo Alto, CA: Learning Policy Institute. https://learningpolicyinstitute.org/product/brief-does-teaching-experience-increase-teacher-effectiveness-review-research; Goldhaber, D., Theobald, R., & Fumia, D. (2018, January). *Teacher quality gaps and student outcomes: Assessing the association between teacher assignments and student math test scores and high school course taking*. Retrieved from National Center for Analysis of Longitudinal Data in Education Research website: https://caldercenter.org/sites/default/files/WP%20185.pdf; Ladd, H. F., & Sorensen, L. C. (2015, December). *Returns to teacher experience: Student achievement and motivation in middle school*. Retrieved from National Center for Analysis of Longitudinal Data in Education Research website: https://caldercenter.org/sites/default/files/WP%20112%20Update_0.pdf; Hanushek, E. A., Rivkin, S. G., & Schiman, J. C. (2016, November). *Dynamic effects of teacher turnover on the quality of instruction*. Retrieved from National Center for Analysis of Longitudinal Data in Education Research website: https://caldercenter.org/sites/default/files/WP%20170_0.pdf

Table 16. School Staff Credentials and Experience, SY 2017-18

Sorted by ELs as Percentage of Total

School and Zone	ELs as %-age of Total School Enrollment	Teachers			Building Administrators	
		Total	0-3 Years of Experience as %-age of Total	Emergency or Preliminary Certification / Out-of-Field Teachers as %-age of Total [80]	Total	0-3 Years of Admin. Experience as %-age of Total
Elementary - 1						
Feinstein at Broad	53.22%	31	23%	16%	1	0%
Spaziano	45.26%[81]	32	3%	3%	2	50%
Spaziano Annex		10	0%	0%	0	0%
D'Abate	42.42%	27	7%	7%	1	0%
Feinstein at Sackett	41.49%	32	6%	3%	1	0%
Lima*	36.18%	39	8%	3%	2	100%
Fortes	26.88%	29	3%	7%	1	100%
Kennedy	24.32%	29	3%	3%	1	0%
Carnevale	22.83%	50	14%	0%	2	0%
Veazie	18.31%	37	5%	5%	2	0%
Pleasant View	13.02%	42	7%	2%	1	100%
Gregorian	12.73%	30	7%	3%	1	0%
Elementary - 2						
Leviton	51.06%	25	4%	0%	1	0%
Fogarty	49.03%	35	17%	9%	2	50%
Young & Woods	48.95%	41	5%	12%	1	0%
Webster	48.22%	28	4%	4%	1	0%
Messer	47.91%	38	16%	8%	2	0%
Reservoir	47.63%	21	5%	10%	1	0%
Lauro*	40.33%	61	20%	15%	3	0%
Kizirian	36.89%	36	14%	0%	2	50%
West	30.06%	45	7%	7%	3	33%
Bailey*	23.24%	36	11%	3%	1	0%
King*	16.39%	34	3%	0%	1	0%
Middle						
Stuart*	33.73%	64	19%	8%	4	50%
Williams*	31.69%	66	29%	14%	3	0%
DelSesto*	29.77%	64	28%	28%	3	67%
West Broadway*	28.40%	35	29%	17%	5	80%
Bishop*	23.77%	52	13%	6%	3	0%
Hopkins	23.25%	43	16%	9%	4	75%

[80] In Providence the number of out-of-field teachers matched the number of teachers who have emergency/preliminary certification. This is not the case in some other Rhode Island Districts, where the number of out-of-field teachers is higher than the number of teachers on emergency/preliminary certification.

[81] Figure is for entire school, including the annex.

School and Zone	ELs as %-age of Total School Enrollment	Teachers			Building Administrators	
		Total	0-3 Years of Experience as %-age of Total	Emergency or Preliminary Certification / Out-of-Field Teachers as %-age of Total [80]	Total	0-3 Years of Admin. Experience as %-age of Total
Greene	21.62%	60	7%	8%	3	100%
High						
Alvarez*	59.06%	48	21%	13%	3	0%
Mount Pleasant*	45.07%	74	16%	22%	5	20%
Central*	40.98%	92	14%	9%	4	25%
Sanchez*	36.44%	52	10%	10%	2	0%
360	36.19%	19	42%	5%	1	100%
Hope*	33.10%	69	12%	3%	4	0%
Evolutions	30.85%	19	47%	11%	1	100%
E-Cubed	23.98%	34	12%	12%	2	0%
Career and Tech	15.63%	70	26%	17%	4	0%
ACE	13.02%	16	19%	13%	3	67%
Times2	9.59%	51	8%	2%	0	0%
Classical	0.46%	65	6%	3%	4	0%
All Schools						
Grand Total	—	**1,781**	**14% (248)**	**9% (155)**	**91**	**31% (28)**

Source: Enrollment data from district. Staff data from Rhode Island Department of Education. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Note: A teacher or administrator may be counted in more than one category. The categories do not sum to 100 percent.

*Schools identified for comprehensive support and improvement

The Council team noted two important 'take-aways' from the data on teacher experience, emergency credentialing, and school administrator experience. First, there appears to be an urgent need to support such teachers and administrators through coaching and other centralized supports. Secondly, there is an urgent need for Providence Public Schools to revamp and upgrade their recruitment, hiring, and retention efforts, including better incentives and compensation for staff with the necessary experience to deliver improved instruction. Schools marked with an asterisk (*) in Table 16 are those that have been identified for comprehensive support and improvement but are not staffed in a way that would bring significant improvements.

Professional Development

Quality, year-round professional development to improve instruction for ELs is a vital and significant component of the DOJ Agreement with Providence Public Schools. The Council learned, however, that there are significant challenges to providing adequate professional development due to the negotiated teacher contract. The Council team saw that PPSD provides professional development through common planning time in schools, and if provided outside of the contractual workday, then teachers are paid at the set hourly rate, a practice that is not unusual. The Council's review of the district's SY 2017-18 School Professional Development Guide

of summer offerings shows that most of the EL-related professional training was product-related (e.g., ELLevation, Imagine Learning, STAR Spanish, etc.), with little focus on best instructional practices. Similarly, in SY 2018-19, of the 15 EL-professional development offerings posted on PPSD's Frontline Professional Growth system, nine were product-related (e.g., ELLevation and Imagine Learning). There was little professional development, however, that was designed to build the capacity of teachers in second language acquisition, instructional design (lesson planning), or scaffolding to ensure ELs were adequately supported academically.

The EL Office appears to be building its capacity to deliver professional development during common planning time throughout the year by training EL coordinators/coaches at the elementary and middle level and a cohort of EL teachers at the secondary level. It has also added several EL-focused courses in the Professional Development Guide for the summer offerings. The Council team learned that ESL-certified staff members assigned to each school were going to provide four professional development sessions in SY 2019-20. These sessions might well be complemented with sessions the team discussed with PTU leadership. Specifically, PTU leadership identified the Teacher Induction Program and the Peer Assistance and Review (PAR) programs as opportunities for providing EL-related professional development and teacher support.

Unfortunately, the approved proposal from TFA on "recruitment and development of district staff" provides only a broad overview of professional development activities. The only mention of English learners was "2.5 hours of continuing education" held every other month from September to May with content cohorts, one of which was dedicated to ELs.[82]

Recommendations

Staffing

New RIDE regulations on teacher certification brings welcome revisions that might prove useful for PPSD in hiring qualified teachers from Connecticut and Massachusetts, for example. Other changes, however, will require strategic planning from PPSD to create on ongoing pipeline of qualified EL teachers that meet both the new RIDE requirements and comport with the DOJ Agreement timeline.

Increasing the number of qualified staff for teaching ELs

50. Maximize use of the PPSD-created alternative certification program with Rhode Island College by increasing the tuition-reimbursement amounts for existing Providence teachers who wish to obtain an ESL certification. The latest update was from the Providence Human Resource Chief who was able to increase the reimbursement to $1,000. A more convincing incentive would be to cover the entire $4,000 in exchange for a five-year commitment to teach ELs in Providence Public Schools.[83] Providing the additional reimbursement could be

[82] City of Providence. (2019, April). Procurement 22915. Retrieved July 25, 2019, from https://providenceri.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=22915

[83] If a teacher leaves prior to fulfilling the 5-year teaching commitment, the teacher would be required to pay back the prorated fee.

done with federal Title II or Title III funds, as long as the amount provided by other state funds remain the same.

51. Charge the Office of Human Resources in PPSD with carefully examining the teacher certification-regulations to determine new demands as well as opportunities to increase the number of teachers who would be qualified to teach in either ESL or dual language/bilingual education settings.
52. Charge the Office of Human Resources with developing a strategic plan for allocating resources to support teachers in obtaining required certification to teach in EL program model classes. This plan should be informed by the inventory of teachers and new teacher certification regulations.
53. Charge the Office of Human Resources to work with the EL Director and other senior staff to explore contractual language that might be proposed in the next negotiated teacher contract to require EL-certified teachers to teach ELs, and provide these teachers with an annual stipend beyond the $800 currently provided.
54. Similarly, prepare contractual language that could be proposed to ensure that classified staff (front office) be able to communicate in languages other than English. PPSD could provide staff interested in learning another language with resources to acquire conversational proficiency. Only staff who meet the language requirement would be eligible for differential pay.
55. Charge the Human Resources and EL Offices with engaging the Rhode Island Department of Education as it begins the implementation of new EL *endorsements* to ensure that they equip teachers to serve ELs and that the endorsements are included in any pathway that provides EL certification within three years.
56. Charge the Office of Human Resources and EL Office with approaching RIDE to explore opportunities to expand higher education opportunities for teachers to take EL-related certification coursework, particularly at institutions located in Providence. Similarly, they should work together with approved higher education institutions to expand access to certification programs by offering courses at centrally located sites operated by the school district. These efforts would help meet the newly required Professional Learning Units for continued teacher certification.
57. Charge the Office of Human Resources and the EL Office with requesting that in any upcoming contract negotiations with Teach for America (and other alternative certification programs) that the new contract include provisions prioritizing the recruitment and training of teachers who meet certification/endorsement requirements for serving English Learners. Furthermore, the contract should explicitly request the provision of EL-related training that aligns with Providence and RIDE professional development and certification standards for all participants in alternative certification programs. The DOJ Settlement Agreement with Providence Public Schools allows alternatively certified teachers (i.e., Teach for America) to meet EL-related certification requirements.

In addition, charge the Office of Human Resources with working with the EL Office to request that RIDE include ESL/bilingual education as a priority in any future authorizations of alternative certification programs.

58. Charge the EL Director to work with Human Resources to revise the EL Collaborative Coach and Coordinator job descriptions to make them comparable to the Literacy and Math coaches. The EL coaches would not provide direct services to students, but they would support teachers who work with ELs and would handle other EL-related responsibilities, such as ACCESS testing. (See related recommendations under *System- and School-Level Supports*.)

59. Charge the EL Director to work with the Supervisor of Guidance to upgrade professional development for PPSD counselors to better serve ELs who may be new to Providence and/or the U.S. In addition, ensure that training for counselors includes cultural competency, trauma-informed counseling, identify formation, etc., along with language-related aspects of culture and identity. Counselors also need to become more familiar with EL pathways to graduation to ensure that students can meet high school credit requirements in a timely manner.

60. Charge the Office of Human Resources with considering elements of the differential compensation system used in Dallas Independent School District to attract, motivate, and retain high performing educators, especially in hard-to-fill positions.[84] For instance, the Strategic Campus Supplemental Earnings document (provisions 18.00 – 18.05 of the DISD Compensation Handbook) describes the supplement earnings provided to Principals, Assistant Principals, Counselors, and others who remain in what DISD calls their "ACE" (Accelerating Campus Excellence) schools, which are schools under improvement plans. More specific to the needs for EL-qualified staff, provisions 16.00 through 16.01 of the handbook specifies the Multi-Language Supplemental Earning provided to professional support positions and certified bilingual teachers.[85]

Flexibility and strategic teacher assignment plan

The current shortage of EL-qualified teachers in PPSD is exacerbated by how the district has operationalized the negotiated the teacher contract regarding teacher assignments and other preferences, even though Article 13 of the contract provides a reasonable framework for making teacher assignments. The Council team makes several recommendations on the existing contract to provide the district with reasonable flexibility to staff needed ESL and bilingual classes to meet EL needs.

61. Charge the EL Director, the Chief of Human Resources, and Zone Executive Directors with establishing a process for each school to determine staffing needs, based on ELs enrolled/projected. This would involve the creation of a Master Schedule that would include:

[84] Dallas Independent School District. (2019). *Compensation resource book 2019-2020.* Retrieved from https://www.dallasisd.org/cms/lib/TX01001475/Centricity/Domain/110/Dallas%20ISD%202019-2020%20Compensation%20Handbook.pdf

[85] Ibid. Pages 45-47

- The number of EL clusters needed at each grade and/or subject area (based on Placement and Scheduling Guidelines)
- The number of EL-authorized teachers needed for each grade and subject area
- Need for newcomer/SIFE programs at elementary, middle or high school levels
- The number of classes/teachers needed for dual language programming at each grade level

Schools should fill positions with current EL-authorized (or in-training to receive authorization) staff and work with HR to recruit and place needed teachers. (Teachers who are not EL-authorized or in-training might be "excessed" and follow district policies to transfer to assignments for which they are qualified.)

62. Charge the EL Director to work with the Chief of Human Resources to draft a needs-based rationale for assigning ESL- and Bilingual/Dual Language Education-certificated teachers to EL classes and courses. The rationale should explicitly address Criteria #1 and #2 of Article 13-1 of the Providence teachers' contract, which focuses on the needs of students and the school district. Given the complexities of comprehensive language proficiency assessments and program selections, it would be helpful to seek an agreement with the teachers' union that provides a two-month grace period before EL course assignments are finalized. After this two-month period at the beginning of the school year, any new course assignments would be reviewed by the ILT—as required by the contract.
63. Consider creating a working group with PPSD senior staff, including Human Resources and Zone Executive Directors, to examine contract language and how the district implements the "preference sheet" to find ways to create greater flexibility with teacher assignments throughout the year. This working group would consult with PTU representatives to arrive at a mutually agreeable process.

    Two important points about assignments during the school year when flexibility is particularly important are:

    - *Beginning of school year*. The initial placement of ELs in the first months of the school year, when the movement of students and teachers might be necessary to finalize placements based on actual student enrollment counts rather than on projections made in the previous year during the budget process; and
    - *Mid-year enrollment*. ELs enroll throughout the year, throwing off initial classroom sizes and teacher assignments made at the beginning of the year. Changes in staffing assignments and student placement are important at the mid-year point to ensure that newly enrolled ELs have access to EL services without exacerbating class sizes in EL-related classes.
64. Charge the EL Director to work with Human Resources and the RPA Office to develop a plan for teacher assignments based on the number of ELs by grade and English proficiency level. This plan should include classes that combine English proficiency levels, as allowed in the DOJ Agreement, to minimize the total number of ESL-certificated teachers needed.

65. Charge the EL Director to work with Zone Executive Directors to design a phased-in plan to place an EL coordinator/coach in each school, prioritizing schools with larger percentages of ELs and that have been identified for Targeted Support and Improvement (TSI). The EL Office and appropriate Zone Executive Directors would provide guidance to principals on the duties of EL coaches/coordinators to ensure that there is consistent messaging about roles and responsibilities. EL Coordinators/coach positions could be partially funded through Title I and Title III funds or funded with school improvement grants. (See Pages 7 through 15 of the U.S. Department of Education's *Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA)* for detailed examples of allowable activities under Title I and Title III.)[86] For instance, the guidance is quite clear about which activities cannot be funded (e.g., assessment for screening/identification and ELPA for monitoring progress) and provides several examples of other, support-type activities and interventions than can be supported by both Title I and Title III funds.

Professional Development

The Council team recommends ongoing professional development—scheduled and on-demand—for administrators and educators in PPSD, centered around developing a sense of shared responsibility for EL achievement and competencies of effective instructional practices for ELs. The DOJ-approved professional development plan lays an important foundation for PPSD educators and administrators to understand the DOJ Agreement, and more broadly, the instructional strategies that are effective in working with ELs to ensure that they meet grade-level expectations.

In addition to this training, the Council team recommends that PPSD create additional opportunities to integrate EL issues and priorities into other staff capacity building efforts, particularly those through state Title I allocations to improve achievement in Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools. Expanding professional learning opportunities for teachers and coaches, however, might be contingent upon the district and the PTU's agreeing to extend the workday. The Council team recommends the following steps to expand professional development opportunities:

66. Invest in the training of EL specialists and others in the EL Office to boost their effectiveness as trainers and coaches in high-leverage instructional approaches and strategies for working with ELs. Metro-Nashville Public Schools, Oakland Unified School District, and Guilford County Public Schools provide useful models and approaches for initiating training for coaches and trainers who will work with principals and teachers.

67. During principals' meetings, create opportunities for the EL Office to present data on EL performance, progress, expectations, and instructional practice.

68. Charge the EL Office with offering monthly or quarterly sessions on EL topics, including English language acquisition, features of effective EL program models, communicating with EL

[86] U.S. Department of Education. (2016, September). *Non-Regulatory Guidance: English Learners and Title III of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA)*. Retrieved from https://www2.ed.gov/policy/elsec/leg/essa/essatitleiiiguidenglishlearners92016.pdf

families, and other relevant topics that teachers and administrators request. Include effective instructional practices for ELs, and teacher use of data to inform instruction, materials, curriculum, instructional sequence, and cognitive and language outcomes. Also, charge the EL Office to work with the Office of Human Resources to ensure that these EL-focused courses and professional development sessions satisfy the annual PLU requirements for teachers.

69. Charge the EL Office with creating a mechanism to support school-level PLCs at each grade level and in each zone. Focus the support around specific challenges of practice.

70. Charge the EL Office with co-planning professional development offered to other district coaches (e.g., literacy, math, and EL) to include language acquisition, expectations for ELs, and instructional practices.

71. Charge the EL Director with designing differentiated and tiered professional development on EL programming, program models, and the DOJ Agreement for school administrators and instructional staff in order to encourage greater familiarity with the issues and create a stronger sense of shared responsibility and ownership for the work. The team recommends that this professional development be developed in collaboration with Zone Executive Directors and include:

    a) *Structures and Processes for Effective Program Implementation and Support*: The how-to, nuts-and-bolts, of starting and sustaining a quality EL program should include: knowing your EL population; creating master schedules and daily scheduling to accommodate ELs; staffing and budgeting with ELs in mind; planning for interventions and supports for ELs; coordinating and using resources (human, fiscal, material); and supporting structures for professional learning. Effective planning and implementation of EL instructional programming requires that school leaders have in-depth knowledge of key factors, including:

        - Each school's EL population—English proficiency, prior education, time in U.S. school, grade distribution, newcomer/SIFE status, immigrant/refugee status, etc.;
        - EL program models—Features and expected outcomes of each EL program model supported in PPSD, and what the features look like in the classroom and school;
        - Features and conditions of effective content-based co-teaching models, including lesson design and co-planning; and
        - Strategic use of data-driven decision making for program and instructional improvement.

    b) *Providing and Supporting Quality Instruction*: Supporting quality instructional practices in the classroom and across each day. School leaders should participate in professional learning with their instructional staff and have a clear understanding of key instructional factors, including:

        - The latest in effective adult learning that ensures participants have opportunities to process, practice, and reflect on practices.

- Systems providing professional learning, such as mentoring; professional learning communities to facilitate teacher and principal collaboration; and job-embedded coaching to support teachers implementing new approaches and strategies.
- The plan approved by DOJ and the latest research findings on such topics as:
  - Expected time to proficiency for ELs
  - Effective practices for teaching ELs, ensuring that participants understand the foundation of second language acquisition to better determine when and how to use instructional strategies for ELs (i.e., do not limit professional development to teaching strategies without a full understanding of the *why*)

72. Charge the EL Director to work with the Executive Director of Professional Learning and Chief of Human Resources to coordinate differentiated professional development on teaching ELs with other professional development offerings in the district, including professional development offered to teachers working under alternative certification programs. Job-embedded coaching should be an integral part of this learning. See Appendix H for a sample professional development plan.
73. Charge the EL Director to work with the Executive Director of Professional Learning and Chief of Human Resources to design opportunities and incentives for teachers with alternate certifications to become teachers of ELs. The design should include district-supported EL-related certification/endorsement opportunities.
74. Charge the EL Director to work with PTU leaders and district staff who comprise the Peer Assistance and Review (PAR) panel to incorporate EL-related features that ensure that teachers are supported in working effectively with ELs. For instance, PAR coaches should have knowledge of instructional best practices for ELs and how the PAR Program could improve teacher effectiveness ratings for teaching ELs. Similarly, opportunities should be identified for adding EL-focused professional development to the teacher induction program.
75. Charge the Chief Academic Officer with directing any CSI and TSI-related and funded professional development to include up-to-date information on teaching ELs.
76. Charge the EL Office with working with Zone Executive Directors on a roll-out plan for EL-related professional development to ensure that it is coordinated and embedded with professional development initiatives across the district. The DOJ-approved professional development content can be a starting point for training on instructional rigor and classroom strategies. The roll-out plan for EL-related professional development should include:
    - a strong English language development component and effective strategies for developing literacy competencies and discipline-specific academic language development aligned to the Common Core;
    - training for all staff (principals, teachers, coaches, and instructional assistants) on the rationale, data, and research foundations for a redefined EL program, as well as the elements of redefined models, guidelines, and procedures for implementing EL programs, and an overall accountability framework for EL achievement;

- an explicit connection between EL-related professional development and professional development in content areas; and
- differentiated professional development that provides relevant and timely training to EL coordinators/coaches, EL teachers, classroom teachers, coaches, principals, and regional staff.

77. Charge EL specialists with maximizing the use of professional learning communities (PLC) as a forum for ongoing professional development and joint examination of EL student work. The EL Office might consider forming PLCs around program models or EL typologies (e.g., dual language programs, newcomers in secondary, etc.) as a way to bring teachers together across the district. PLCs around EL program models would also provide opportunities for instructional leaders to share information about what is working and what isn't. These cohorts might also allow the EL Office to better coordinate professional development and supports.
78. Have EL coordinators/coaches at the schools deliver in-classroom supports in a manner that provides teachers with time to practice EL strategies in a way that reflects high expectations and fosters English proficiency, academic language, and content area learning.

E. EL Instructional Program Support and Monitoring

This section elaborates on the team's findings and recommendations around how Providence schools support instructional practices for ELs specifically and all students, in general. The team noted insufficient staffing to support the needs of teachers and schools working with ELs and insufficient attention to improving core, Tier I instruction for ELs in each school's improvement plan. Recommendations for supporting program monitoring and improved instruction and accountability are organized around the following categories: overall system-level, EL Office/central office level, and school-level.

Findings

Instructional Practice and Outcomes

The low achievement of ELs in PPSD signals an urgent need to equip teachers and school leaders with the knowledge and tools to improve instruction for these and other students. With ELs comprising over 30 percent of PPSD, effective strategies for serving ELs should figure into all instructional practice guides, staffing assignments, observation tools, coaching procedures and protocols, and evaluations. Furthermore, ELs comprise over 30 percent of students in half the schools, suggesting that principals and teachers need more comprehensive supports for implementing quality programming for ELs. The need to improve EL achievement and meet the numerous requirements of the DOJ Settlement Agreement require an investment in instructional excellence and human capital at every level of the system. It will also require regular and effective progress monitoring.

During the Council's visit, the team learned about existing staffing configurations and funding of instructional coaches for both general education students and ELs. It was clear through staff interviews that EL Coordinators/Coaches have multiple roles in the schools, including providing

direct instruction to ELs, supporting teachers, and handling assessment responsibilities. Some duties varied across school levels, but the team heard that many EL Coordinators/Coaches devoted inordinate amounts of time attending IEP meetings, limiting the time they can spend directly supporting teachers. EL Coordinators/Coaches also reported that they worked on school improvement plans, provided professional development, helped EL Coordinators/Coaches schedule services for ELs, and participated in common planning time. Some EL Coordinators/Coaches indicated that they accompanied Zone Executive Directors in conducting instructional rounds, some of which were done with math and literacy coaches. The team's review of job descriptions for EL Coordinators/Coaches confirmed what we were told during interviews and what the team witnessed during school visits. The EL Coordinator/Coach job description included a wide variety of duties that were organized around the following categories:

- *Management of EL programs and needs.* Ensuring compliance with state and federal educational policies and regulations related to civil rights, working with the Office of ELs and the Office of Specialized Instruction, working with principals to ensure that school policies and procedures uphold high standards for ELs, and maintaining up-to-date student data and records to inform teachers and EL parents about the progress of students.
- *Teacher support and classroom support.* When not teaching, the EL Coordinator/Coach provides professional development to both EL teachers and general education teachers. They also provide demonstration lessons, co-teaching opportunities, and coaching. Moreover, they assist in lesson planning and provide informal observations and feedback to EL staff and others who have ELs on their rosters. They also plan for and implement formal and required assessments for ELs, including but not limited to ACCESS 2.0.
- *Oversight of common spaces and communication*. In addition, they ensure that EL teachers and staff working with ELs have the instructional tools and equipment needed to provide high quality instruction, maintain professional libraries and resources, as well as plan space for EL teachers and general education teachers to plan and collaborate.

The team was told that sometimes, the numerous and varied duties assigned to EL Coordinators/Coaches impede their ability to fully support teachers—both EL and general education. The district might want to consider transferring some of the administrative responsibilities onto school leadership (the principal or a designee) with support from the EL Coordinator/Coach and/or transfer some of the direct teaching responsibilities.

School Improvement Plans under Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI)

The improvement of EL instructional programs, of course, requires a well-integrated effort when it comes to improving CSI and TSI schools to ensure that plans to improve these schools also address EL needs. In accordance to the school status data described earlier, the Council team suggests determining two priority cohorts, specifically targeted for the roll-out of system-supported improvements in the instructional services for ELs.

Priority One: Schools identified as ***both*** CSI and TSI include three elementary schools, five middle schools, and two high schools listed in Table 8.[87] These schools should be supported as a learning community to improve instructional practices for ELs, carry out improvements required of CSI and/TSI schools, and hold school and district leadership accountable for EL-related program improvements.

Priority Two: Schools identified in need of TSI due to underperformance of ELs. Six additional schools would incorporate strategies and resources specifically to improve instruction for ELs.

To support the priorities related to CSI and TSI schools, the Council team suggests that PPSD work with RIDE to ensure that school supports, based on ESSA accountability requirements, consider the programmatic needs of ELs.

Program Monitoring and Accountability

The DOJ Agreement imposes a series of monitoring activities that include EL data collection and tracking; EL placement and services; EL achievement monitoring; school-level audits, and overall EL program evaluation. Beyond these requirements, data are important to provide continuous feedback on the ongoing improvement of instruction for ELs. The EL Office is responsible for gathering and monitoring these data for overall compliance with the DOJ Agreement, but this work will only be effective in conjunction with other senior leadership at the central office and zone levels working in tandem towards a systemwide sense of responsibility for EL achievement. The EL Office is also responsible for assisting Zone Executive Directors and principals in conducting walkthroughs.

Recommendations

The Council recommends multiple actions to strengthen structures, systems, and staffing in support of better instruction for ELs and accountability at the district, school, and zone levels for the outcomes of ELs.

System-level Accountability

79. Charge the Chief Academic Officer with establishing an EL accountability working group, led by the EL Office, to coordinate various data reporting requirements and ensure that each office accepts their responsibility for EL instruction and for meeting DOJ requirements. Specifically—

    - The Registration Office should be responsible for data collection and data cleaning of all data elements related to initial screening and placement.
    - Human Resources should be responsible for data collection and cleaning all data related to teacher hiring dates, qualifications, professional development participation, incentives for certification, and class/course assignments. It should also be responsible for tracking

[87] Alfred Lima, Carl Lauro, Robert Bailey, Del Sesto, Gilbert Stuart, Nathan Bishop, Roger Williams, West Broadway, Hope High School, and Mt. Pleasant High School

professional development-related data on participation and details of training offered to both teachers and principals—in accordance with the DOJ Agreement.

- Principals and principal supervisors should be responsible for data related to the number of ELs in each school, the type of EL services received, and the teachers providing these services. Principals would also be responsible for keeping data—as delineated in the Agreement—on ELs who have opted out of EL services.
- Zone Executive Directors would be responsible for ensuring that schools under their supervision are implementing quality instructional models for ELs. EL specialists would work with Zone Executive Directors and individual principals on walk-throughs, data reviews, and teacher supports.

80. The EL Office would also receive reports in accordance with the timeline specified in the DOJ Agreement, and it would work with the Research, Planning, and Accountability Office to prepare reports for DOJ.
81. Charge the Office of ELs to work with Zone Executive Directors to review placement data on long-term ELs (those who have been in the EL program more than five years) to ensure that English proficiency data by domain are examined to place students according to their strongest domain and minimize linguistic isolation.
82. Charge the Office of ELs with leading a working group that includes Zone Executive Directors and principals to revise the *Sheltered Strategies Look Fors Tool* and to convert it into a tool for *Effective Instruction for ELs* that includes and highlights high-leverage strategies to access grade-level content, is user-friendly, and is clearly articulated to the district's overall instructional improvement efforts and teacher evaluations. Appendix I provides examples of the indicators Oakland Unified School District (OUSD) uses in its instructional reviews.
83. Establish a coherent system of EL progress monitoring across all schools that would include progress in both English language and content/academic development. This monitoring would be based both on quantitative data as well as qualitative information from the walk-throughs, using a revised *EL Strategies Walkthrough Tool*. Appendix I includes an example of how OUSD carries out their EL reviews. These monitoring data should be regularly reviewed by the superintendent and school board.

EL-led and Coordinated Central Office Support to Schools

84. Implement a coaching strategy in schools where EL program implementation is not strong or effective. In addition to differentiating the professional development, consider putting into place a tiered system of guidance/supports for schools that would allow the EL Office, working with Zone Executive Director staff, to provide strategic and layered coaching for schools according to identified needs and EL performance data. The support should include guidance, handbooks, and professional development to explain newly designed EL program models with delineated expectations and accountability. The criteria for providing support at each school would include metrics from the DOJ Settlement Agreement as well as metrics on school leadership capacity and buy-in, teacher capacity (qualifications, experience, buy-in),

EL program design and fidelity of implementation, and EL achievement data. Differentiated support might fall into the following categories:

- *Level A—Overall program design and school supports to serve ELs.* These schools would be characterized as requiring significant improvements to their EL services and overall EL program structure. The schools might have new or developing leadership and/or teachers with limited knowledge of EL instruction, requiring intensive professional development.
- *Level B—Instructional support to improve achievement of ELs.* This level might include schools that have key components and conditions to improve their EL programs but whose achievement continues to lag. These schools might have strong, committed leadership on behalf of ELs and committed staff with some EL instructional background or knowledge. Support to these places would be more targeted, and would be jointly determined with the EL Office, the respective zone, and school and teacher leadership.
- *Level C—Monitor instructional support to help schools sustain success.* These schools would be those with more promising EL programs that are well-staffed, show high levels of integration and coordination between EL programs and general education, and are showing improved academic outcomes for ELs. These schools could serve as EL learning labs for the entire school system. Assistance for these schools would be based on specific requests.

School-level Supports and Accountability

85. Charge the EL Office with building the capacity of its EL specialists to provide supports and professional development to EL Coaches or EL Coordinators who, in turn, would support school leaders and teachers in the schools. Through periodic meetings with EL coordinators/coaches, enhance opportunities for high quality professional learning focused on enhanced instructional practices, problem solving, and EL program implementation. At the school level, EL specialists could be called to assist school-based EL Coordinators/Coaches to gauge teacher needs in serving ELs.
86. Have school principals or assistant principals explicitly evaluate ESL/ELD teachers and general education teachers working with ELs. In the case of teachers providing instruction in Spanish, the evaluator should be able to understand the language and pedagogy being used.
87. Charge school leadership with implementing a system of monitoring, review, and appropriate instructional/programmatic response for ELs in their schools.
88. Charge school leadership, including EL Coordinators/Coaches, with ensuring that all allowable linguistic accommodations are made available to ELs during state testing. Further, school leaders should ensure that teachers provide students with regular opportunities to use these accommodations during content instruction throughout the school year. For example, students need to become effective and efficient users of bilingual glossaries during mathematics, science, or other content classes.
89. Charge the EL Office to work with Human Resources to redefine the roles and corresponding job descriptions of school-based EL coordinators/coaches to relieve them of some classroom

duties (direct service of ELs) and allow them to focus on providing embedded coaching opportunities, leading professional learning communities (PLC), and assisting principals in overall management of EL instruction. Management and compliance-related responsibilities would be in the hands of principals or his/her designee and responsibilities for EL instruction would be left to EL teachers.

F. Family and Community Engagement and Communication

The Council team interviewed staff from the Communications Office and the Office of Family and Community Engagement (FACE). The functions and responsibilities of both offices converged and even overlapped to some extent, making it difficult to get a clear picture of respective roles and synergies across the offices. Thus, the discussions below are organized around functions and issues the team heard, regardless of office.

Findings

***Responsiveness*.** Both offices appeared to be responsive to community and family needs, but not always in a strategic way. Currently, much of the translation and interpretation services seem to be reactive, that is responding to emergencies and the urgency of the communication. Support to schools was uneven, with some schools receiving virtually no services. The team saw that FACE had knowledgeable staff with strong connections to the community and could handle district-wide parent meetings (like the one organized for the Council team, which was well attended); PTO meetings at schools; family events; one-on-one interpretations; attendance teams to reduce absenteeism; health fairs; academies and workshops for the entire system; and choice fairs on school selection.

Interpretation services and translation services. In addition to providing training, information sessions and supports to families, the Parent Engagement unit provided interpretation and translation services, upon request, to schools through a small cadre of bilingual parent specialists fluent in Spanish (2) and Hmong (1). The Communications Office had a translator who provided written translations of web and video content, and the Office of Specialized Instruction had a separate contract for interpretation. For parent-teacher conferences, staff did not describe a specific plan for ensuring coverage of needed interpretation services, but as one staff member said, “We don’t have sufficient staff.”

Selected documents and limited languages. There was no apparent system in PPSD for addressing the top languages or providing translated documents based on the population served. Several district documents are translated into Spanish, but those available in other languages are few and far between and do not align with the top languages spoken by ELs in the district. The same was true for robocalls that currently only go out in English and Spanish. For example, the Home Language Survey is available in Spanish, Portuguese, Arabic, and Chinese. However, the top languages in the district (other than Spanish) were Khmer, Creole, Portuguese, and Swahili. Other documents available to staff in an online archive, but not accessible to parents, were translated into Khmer, Hmong, Portuguese, Arabic, and Swahili. Several important documents

were not translated at all, such as the Parent Involvement Policy, the Graduation Policy, the Grading Policy, and others.

Systemwide tools but no systemwide communication. The district has a program that allows staff to send text messages in other languages, and the district website uses Google Translate but has no system for telephonic interpretation. The team learned during interviews that communications efforts in PPSD were fragmented as the result of schools individually determining what was included on their websites, handling text-messaging, and crafting social media messages. The Communications Office provides social media training and assistance to help with social media. The team learned that the Family and Community Engagement Office also provided training to schools on social media tools. Neither social media training effort appeared to result in much consistency across school sites. Schools must decide how much of their budgets to allocate for communication efforts. The Council team visited the PPSD website and conducted various internet searches that led to schools and PPSD webpages with often incomplete or outdated information. Some schools had robust websites with relevant and up-to-date information about course offerings and graduation requirements, while others had pages that were either empty or "under construction."

School needs. During school visits, principals indicated that they needed more translation and interpretation services, especially since front office staff typically did not speak languages other than English. Staff reported to the team that in some schools, teaching assistants were regularly pulled out of classes to translate. Staff also indicated that schools had insufficient funds to maintain a constant stream of information for their websites or social media outlets, which would require a writer and translator. The Office of Family and Community Engagement had four parent specialists providing support to 41 schools. The middle school cultural coordinators ask FACE to provide support and training. School offices typically do not have individuals who speak several languages, and the team was told that no training was provided to office staff to create welcoming settings for EL families. The four FACE specialists focus on eight schools, leaving all other schools to be served *via* a contract with Pinpoint services.

Recommendations

The Council team saw evidence that EL families were experiencing uncertainty about their children's educational experiences, given the paucity of engagement efforts and information that addressed their needs. The recommendations provided below are specific to EL families and would fit within any systemwide improvement effort to build an effective, sustainable, and two-way community engagement strategy.

90. Create a cross-departmental working group that includes the EL Office, FACE, school personnel, and selected EL parents. Charge this group with developing a plan to translate critical school- and district-documents and designing an efficient translation and interpretation request system for schools and the community. This working group would be part of a larger districtwide effort to build a cohesive communication plan with clear roles and responsibilities across offices, and a well-supported and guided social media and school website strategy. The working group would also make recommendations for investments in:

- A subscription service and repository of official school district documents in the top ten languages used by families of ELs in PPSD (e.g., TransAct)
- Access to telephonic or video interpretations (e.g., Telelanguage)
- Investment in software to accelerate translations made in-house

91. Charge the cross-departmental team with identifying a telephonic interpretation system that would allow schools and the district to communicate in more languages. These systems often offer a “pay-as-you-go" contract based on usage and do not require equipment other than telephones with three-way dialing capabilities. In addition, they often provide schools with language identification cards that can be placed in school and district offices to assist parents in understanding their rights related to translations and interpretation services and in communicating in the language they speak.
92. Consider charging the Parent and Community Engagement Office with managing requests for interpretation and translation services to meet DOJ remedies and ensuring that EL families have the information they need to navigate Providence Schools and support their child. The office has had long-standing and stable leadership and has gained the confidence of many in the EL community. A web-based system for requesting interpretations and translations would allow FACE to properly plan for, respond to, and track requests. The following school district sites provide samples of request systems that could implemented: Montgomery County Public Schools,[88] Jefferson County Public Schools,[89] and St. Paul Public Schools.[90]
93. Provide annual training to district personnel at all levels on communicating with EL families. Ensure that schools have the data to know the languages spoken by their students and that parental preferences for languages of communication are noted in student records. Note that the identification of top languages would include families of EL and English proficient students who speak another language at home (over 50 percent of district students).

G. English Learners in Special Education

Findings

From SY 2016-17 to SY 2018-19, the percentage of students in PPSD who had IEPs remained constant at around 15 percent, totaling 3,676 students in SY 2018-19, based on numbers provided in February 2019. Of this total, 2,563 were Non-ELs and 1,113 were ELs. (See Table 17

[88] Montgomery County Public Schools. (2019). Language assistance services unit. Retrieved August 20, 2019, from https://www.montgomeryschoolsmd.org/departments/lasu/
[89] Jefferson County Public Schools. (2018). Language services. Retrieved August 20, 2019, from https://www.jefferson.kyschools.us/department/academic-services-division/academic-support-programs/english-second-language/language
[90] Saint Paul Public Schools. (2019). Translation services. Retrieved August 20, 2019, from https://www.spps.org/Page/3106

and Figure 25.) The aggregated figures were calculated using district-level data that did not include duplicated counts of students who transferred between schools or out of the district.[91]

The varying change in numbers of ELs and Non-ELs with IEPs may be due to either different experiences with the referral and identification process or differences in expectations of the two groups. The three-year data examined by the Council showed that while ELs identified as requiring special education (i.e., having an IEP) *increased* by 240 students between SY 2016-17 to SY 2018-19—or 27.5 percent--Non-ELs decreased by 330 students—or 11.6 percent.

Table 17. EL and Non-EL Participation in Special Education, SY 2016-17 to SY 2018-19

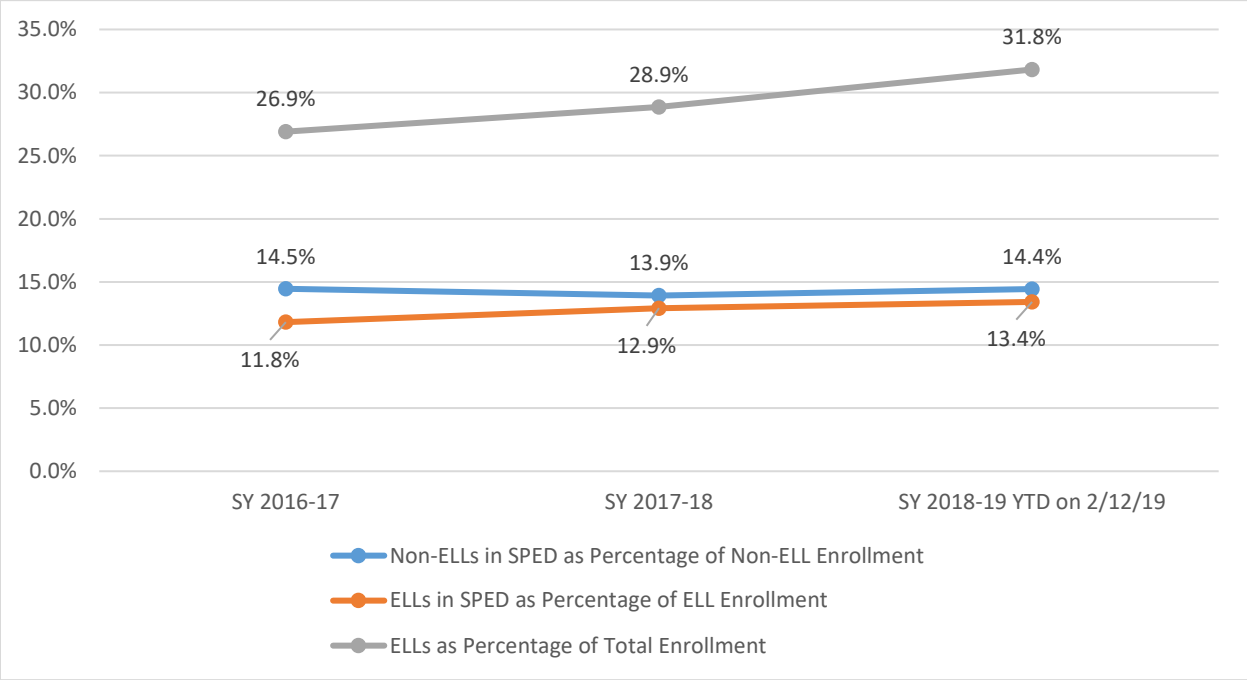
	SY 2016-17	SY 2017-18	SY 2018-19 YTD on 2/12/19	Change from SY 2016-17 to SY 2018-19
Total Student Enrollment	27,467	27,480	26,065	-1,402
Non-ELs	20,077	19,548	17,769	-2,308
ELs	7,390	7,932	8,296	906
Total in Special Education	3,775	3,746	3,676	-99
Non-ELs in Special Education	2,902	2,721	2,563	-339
ELs in Special Education	873	1,025	1,113	240

Source: Council analysis of district-submitted data.

Note: Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

[91] District-level and school-level data were not reported using the same methodology, therefore aggregated school-level totals do not necessarily match reported district totals. The district-level data exclude Providence Public Schools students who were not enrolled in a district school. Furthermore, district-level data do not include students who were ever enrolled, whereas the school-level data include any student who was *ever enrolled* during the year. Students who transferred to another in-district school count as *ever enrolled* for each school but only once for the district.

Figure 25. Percentage of Total ELs, ELs in Special Education, and Non-ELs in Special Education, SY 2016-17 to SY 2018-19



Source: Council analysis of district-submitted data.
Note: Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

The regional distribution of enrollment changes in both subsets of students is shown in Tables 18-21 and Figures 26-29. The greatest increase in all IEPs occurred at the middle school level with 121 students (a 13 percent increase), followed by a 111 student (76 percent) increase of ELs with IEPs in high school. In contrast, the number of Non-ELs in special education dropped by 339 students over the same three-year period.

Changes in Elementary

In both elementary school zones, the number of Non-ELs with IEPs fell over the three-year period, while the number of ELs with IEPs increased during the same period. Zones 1 and 2 for elementary, however, show dissimilar trends in each of the two subsets of students, with a greater decrease in Elementary Zone 1 for Non-ELs with IEPs and a greater increase in Zone 2 for ELs with IEPs. (See Tables 18-19.) Specifically—

- Zone 1 experienced a net decrease of 62 students with IEPs, but this change comprised a decrease of 73 Non-ELs and an increase of 11 ELs with IEP.
- Zone 2 experienced a smaller net decrease of four students with IEPs, but this change comprised 43 fewer Non-ELs and 39 more ELs with IEPs.

Table 18. Elementary 1: EL and Non-EL Participation in Special Education, SY 2016-17 to SY 2018-19

	SY 2016-17	SY 2017-18	SY 2018-19 YTD on 2/12/19	Change from SY 2016-17 to SY 2018-19
Total Student Enrollment	6,028	5,896	5,595	-433
Non-ELs	4,425	4,217	3,865	-560
ELs	1,603	1,679	1,730	127
Total in Special Education	1,025	1,028	963	-62
Non-ELs in Special Education	725	677	652	-73
ELs in Special Education	300	351	311	11

Source: Council analysis of district-submitted data.
Note: Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

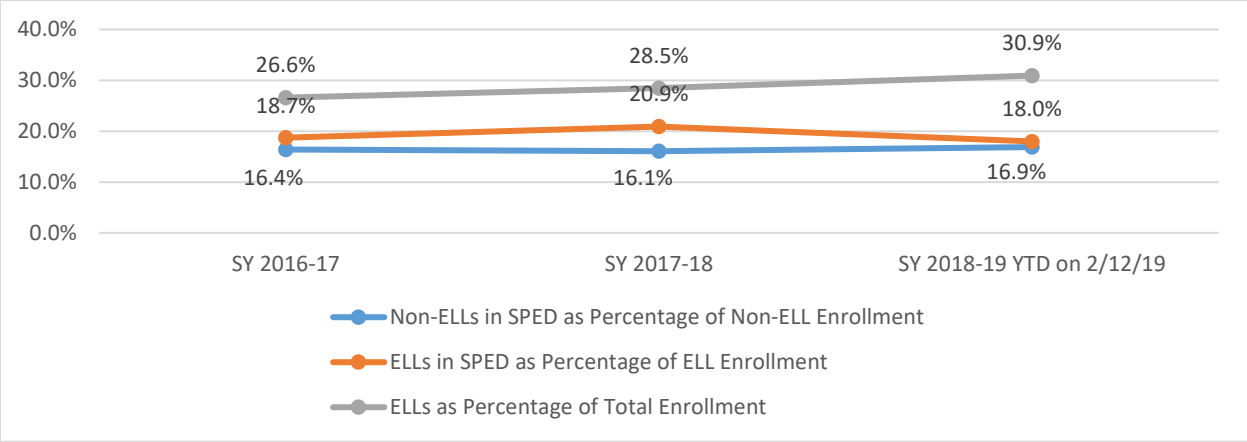
Table 19. Elementary 2: EL and Non-EL Participation in Special Education, SY 2016-17 to SY 2018-19

	SY 2016-17	SY 2017-18	SY 2018-19 YTD on 2/12/19	Change from SY 2016-17 to SY 2018-19
Total Student Enrollment	6,756	6,537	6,098	-658
Non-ELs	4,457	4,190	3,714	-743
ELs	2,299	2,347	2,384	85
Total in Special Education	740	768	736	-4
Non-ELs in Special Education	509	495	466	-43
ELs in Special Education	231	273	270	39

Source: Council analysis of district-submitted data.
Note: Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

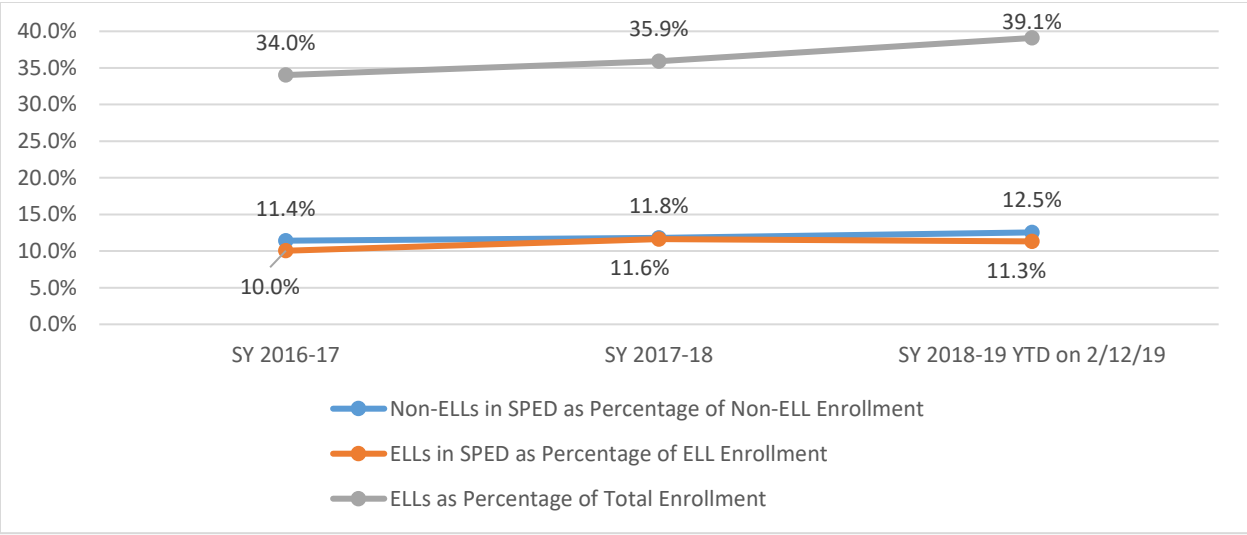
Figures 26 and 27 show additional data that help contextualize the changes in special education enrollment between SY 2016-17 and SY 2018-19. For instance, in SY 2018-19, ELs in Elementary Zone 2 comprised a larger percentage of total enrollment in its schools—39 percent compared to 30 percent in Elementary Zone 1. The percentages of students with IEPs, for both Non-EL and ELs, were higher in Zone 2 (39 percent in SY 2018-19) than in Zone 1 (31 percent in SY 2018-19).

Figure 26. Elementary 1: Percentage of Total ELs, ELs in Special Education, and Non-ELs in Special Education, SY 2016-17 to SY 2018-19[92]



Source: Council analysis of district-submitted data.

Figure 27. Elementary 2: Percentage of Total ELs, ELs in Special Education, and Non-ELs in Special Education, SY 2016-17 to SY 2018-19[93]



Source: Council analysis of district-submitted data.

Change in Middle Schools

Middle school enrollment data show an overall increase in the number of ELs (376 more ELs) and a decrease of Non-ELs (544 fewer students) over the three-year period. The overall number of

[92] Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.
[93] Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

students with IEPs decreased by 121 students over the period, but this decrease was mostly among Non-ELs with IEPs (200 fewer). ELs with IEPs increased by 79. (See Table 20.)

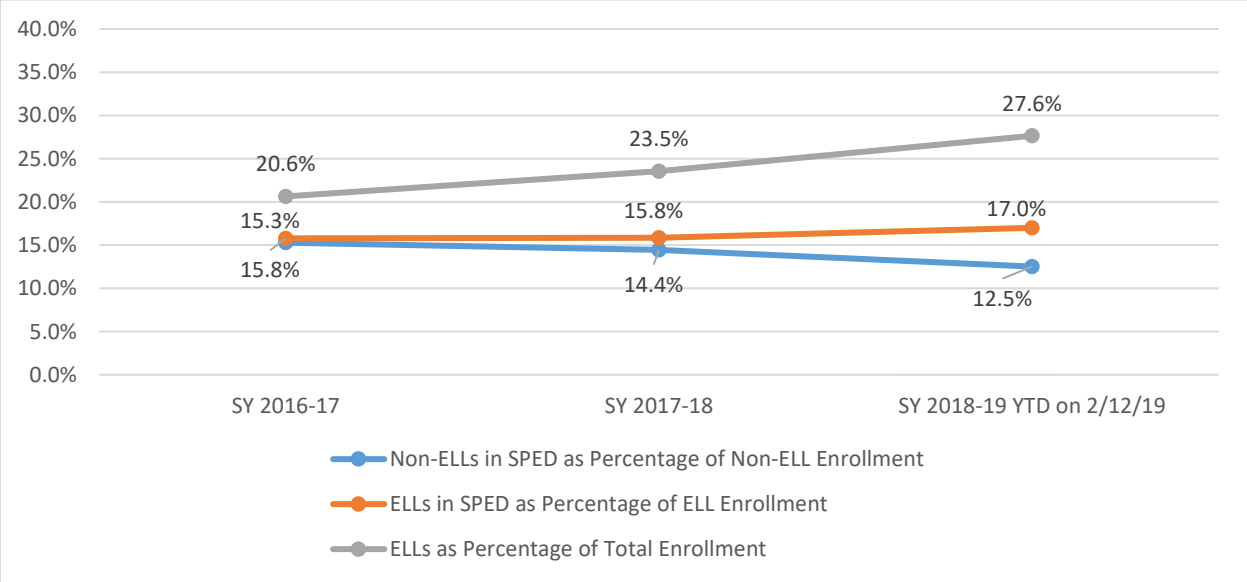
Table 20. Middle: EL and Non-EL Participation in Special Education, SY 2016-17 to SY 2018-19[94]

	SY 2016-17	SY 2017-18	SY 2018-19 YTD on 2/12/19	Change from SY 2016-17 to SY 2018-19
Total Student Enrollment	6,020	6,087	5,852	-168
Non-ELs	4,778	4,654	4,234	-544
ELs	1,242	1,433	1,618	376
Total in Special Education	926	899	805	-121
Non-ELs in Special Education	730	672	530	-200
ELs in Special Education	196	227	275	79

Source: Council analysis of district-submitted data.

The percentage change in overall enrollment and students with IEPs in middle school is shown in Figure 28. There was an increase in the number of ELs, approximating 28 percent of all PPSD enrolled in SY 2018-19, from 21 percent two years earlier. The percentage of ELs with IEPs increased from 15.3 percent in SY 2016-17 to 17 percent in SY 2018-19, while for Non-ELs, the rate decreased from 15.8 percent in SY 2016-17 to 12.5 percent in SY 2018-19. In other words, ELs with IEPs showed an upward trend, while Non-ELs with IEPs showed a downward trend.

Figure 28. Middle: Percentage of Total ELs, ELs in Special Education, and Non-ELs in Special Education, SY 2016-17 to SY 2018-19[95]



Source: Council analysis of district-submitted data.

[94] Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

[95] Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

Change in High Schools

High school enrollment data showed an increase in the number of ELs (318 more ELs) and a decrease in Non-ELs (461 fewer students) over the three-year period examined by the Council. The number of students with IEPs increased by 88 students over the period, all of it attributed to an increase in ELs with IEPs (111 more ELs), since Non-ELs with IEPs decreased by 23 students during this time. (See Table 21.)

Table 21. High: EL and Non-EL Participation in Special Education, SY 2016-17 to SY 2018-19[96]

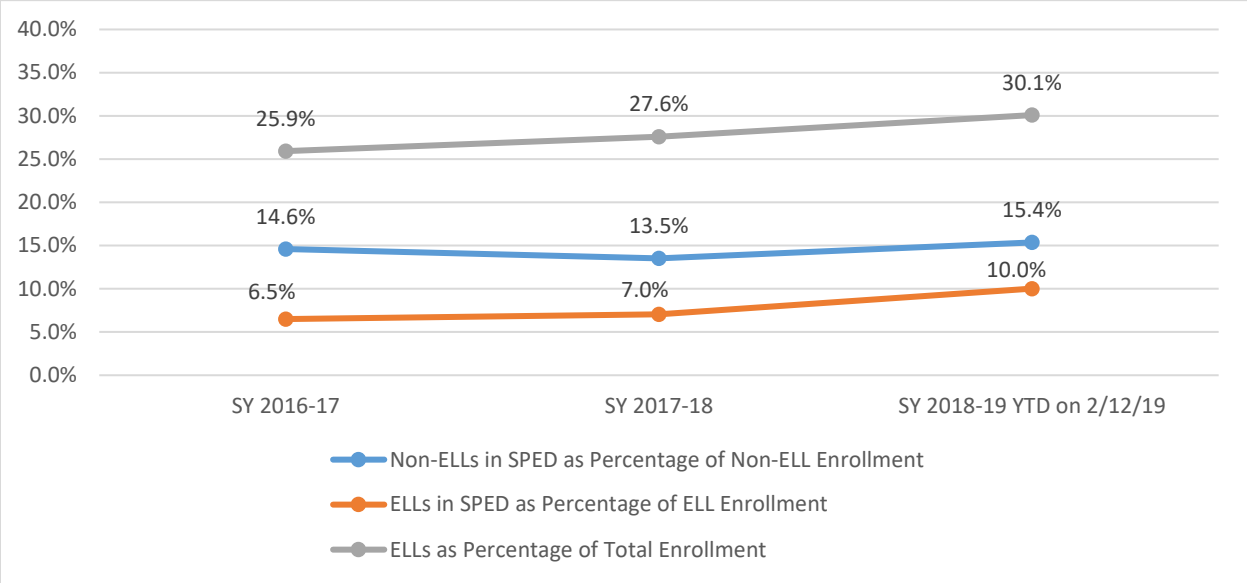
	SY 2016-17	SY 2017-18	SY 2018-19 YTD on 2/12/19	Change from SY 2016-17 to SY 2018-19
Total Student Enrollment	8,663	8,960	8,520	-143
Non-ELs	6,417	6,487	5,956	-461
ELs	2,246	2,473	2,564	318
Total in Special Education	1,084	1,051	1,172	88
Non-ELs in Special Education	938	877	915	-23
ELs in Special Education	146	174	257	111

Source: Council analysis of district-submitted data.

Figure 29 illustrates the relative trends of ELs and Non-ELs identified as requiring special education in high school. ELs with IEPs in high school grew substantially during the three-year period, resulting in their comprising 10 percent of all ELs in SY 2018-19, compared to 6.5 percent two years earlier. In contrast, the rate of Non-ELs with IEPs remained relatively constant at 14.6 percent in SY 2016-17 and 15.4 percent in SY 2018-19. The growth in the EL enrollment in high schools might explain some of the growth of ELs with IEP overall, but further examination is required to explain a 70 percent increase in the number of ELs with IEPs.

[96] Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

Figure 29. High: Percentage of Total ELs, ELs in Special Education, and Non-ELs in Special Education, SY 2016-17 to SY 2018-19[97]



Source: Council analysis of district-submitted data.

School-level Changes in Enrollment in Students with IEPs

The Council team also examined school-level data, which confirmed what staff noted during interviews—that is, the identification of ELs with special needs can be difficult in some schools, while in other schools, there appears to be a tendency to overidentify ELs as requiring special education. As a result, school-level figures revealed a wide variation, with some schools seeing a large increase in the number of ELs with IEPs and others showing large decreases.

The pattern of increases and decreases at the school level is erratic, but generally, it shows that increases are more pronounced for ELs than for Non-ELs. Given the variability at the school-level, we calculated the median percentage change for ELs and Non-ELs, aggregated by zone, to compare ELs with IEPs and Non-ELs with IEPs. Table 22 provides data on the percentage changes, indicating the median, highest, and lowest percentage changes by school. For school-by-school figures (number and percentage), see Table 23.

For the ***Non-EL group***, the medians in the elementary and middle school zones were negative, while in the high schools they were zero (0.00). Specifically, the median percentage changes were as follows:

- *Elementary Zone 1*—The median percent change was a 14.29 percent *decrease*. At the lower end of the range, the school with the largest *decrease* experienced a 40 percent drop in Non-ELs with IEPs, and at the upper end, the school experienced an *increase* of 28 percent.

[97] Note: Figures used for calculations are aggregated from school-level data, which includes "ever students" that were excluded in reported district-level data.

- *Elementary Zone 2*—The median percent change was a 7.06 percent *decrease*. At the lower end of the range, the school experienced a 39 percent *drop* in Non-ELs with IEPs, and at the higher end, the school experienced an *increase* of 50 percent.
- *Middle Schools*—The median percent change was a 28.42 percent *decrease*. At the lower end of the range, the school experienced a 36 *decrease* in Non-ELs with IEPs, and at the higher end, the school experienced a *decrease* of 11 percent.
- *High Schools*—The median percent change was zero (0.0) percent. At the lower end of the range, the school experienced a 44 *decrease* in Non-ELs with IEPs, and at the higher end, the school experienced an *increase* of 79 percent.

In contrast, the median change in enrollments of ***ELs with IEPs*** in each zone all show increases, except for the median in Elementary Zone 2. The zone-specific medians for ***ELs with IEPs*** are as follows:

- *Elementary Zone 1*—The median percent change was an 11.11 percent *increase*. At the lower end of the range, the school with the largest *decrease* experienced a 36 percent drop in ELs with IEPs, and at the higher end, the school experienced an *increase* of 138 percent.
- *Elementary Zone 2*—The median percent change was a 0.0 percent *increase*. At the lower end of the range, the school experienced a 22 percent *drop* in ELs with IEPs, and at the higher end, the school experienced an *increase* of 89 percent.
- *Middle Schools*—The median percent change was a 40 percent *increase*. At the lower end of the range, the school experienced a three percent *increase* in ELs with IEPs, and at the higher end, the school experienced an *increase* of 91 percent.
- *High Schools*—The median percent change was a 75 percent *increase*. At the lower end of the range, the school experienced *no change* in the number of ELs with IEPs, and at the higher end, the school experienced an *increase* of 123 percent.

Table 22. Median Percentage Change and Ranges by Zone, SY 2016-17 to SY 2018-19

Zone	Range of Change in Number of ELs w/IEP		Range of Percentage Change of ELLS w/ IEP		Median of Percentage Changes		Range of Change in Number of Non-ELs w/ IEP		Range of Percentage Change of Non-ELs w/ IEP	
	Lower Bound	Higher Bound	Lower Bound	Higher Bound	ELs w/ IEP	Non-EL w/ IEP	Lower Bound	Higher Bound	Lower Bound	Higher Bound
Elementary I	-20	12	-36.36%	137.50%	11.11%	-14.29%	-23	8	-39.53%	28.00%
Elementary II	-4	16	-22.22%	88.89%	0.00%	-7.06%	-17	7	-38.64%	50.00%
Middle Schools	1	31	3.33%	91.18%	40.00%	-28.42%	-50	-9	-35.71%	-10.71%
High Schools	0	31	0.00%	122.73%	75.07%	0.00%	-23	12	-44.44%	78.57%

Source: District-submitted data

The school-by-school enrollment in each of the three years is shown in Table 23, which also shows the percentage share of ELs with IEPs as well as the share of ELs of the total school enrollment. It is important to note that changes in the percentage of ELs with IEPs are, in part, related to ELs' overall percentage of school enrollment. Another important factor involves the screening and identification process.

Table 23. ELs with IEPs as Percentage of Total IEPs by School and Zone, SY 2016-17 to SY 2018-19

	SY 2016-17				SY 2017-18				SY 2018-19 (YTD as of 2/12/2019)			
	EL IEPs	Total IEPs	EL IEPs as %-age of Total IEPs	*ELs as %-age of School Total*	EL IEPs	Total IEPs	EL IEPs as %-age of Total IEPs	*ELs as %-age of School Total*	EL IEPs	Total IEPs	EL IEPs as %-age of Total IEPs	*ELs as %-age of School Total*
Elementary – 1												
Carnevale	55	185	29.7%	*20.3%*	55	185	29.7%	*23.6%*	58	190	30.5%	*22.8%*
D'Abate	24	57	42.1%	*37.7%*	24	57	42.1%	*37.4%*	21	53	39.6%	*42.4%*
Feinstein at Broad	23	38	60.5%	*47.5%*	23	38	60.5%	*50.7%*	17	33	51.5%	*53.2%*
Feinstein at Sackett	30	75	40.0%	*34.8%*	30	75	40.0%	*36.1%*	36	66	54.5%	*41.5%*
Fortes	39	106	36.8%	*23.0%*	39	106	36.8%	*30.8%*	26	110	23.6%	*26.9%*
Gregorian	16	70	22.9%	*11.8%*	16	70	22.9%	*12.1%*	19	81	23.5%	*12.7%*
Kennedy	13	67	19.4%	*14.4%*	13	67	19.4%	*19.4%*	19	71	26.8%	*24.3%*
Lima	44	82	53.7%	*26.6%*	44	82	53.7%	*28.1%*	37	63	58.7%	*36.2%*
Pleasant View	40	189	21.2%	*14.2%*	40	189	21.2%	*17.8%*	23	161	14.3%	*13.0%*
Spaziano	49	82	59.8%	*42.8%*	49	82	59.8%	*39.5%*	35	63	55.6%	*45.3%*
Veazie	18	77	23.4%	*15.5%*	18	77	23.4%	*16.8%*	20	72	27.8%	*18.3%*
Elementary – 2												
Bailey	23	108	21.3%	*19.3%*	29	108	26.9%	*20.6%*	23	102	22.5%	*23.2%*
Fogarty	27	63	42.9%	*42.9%*	29	70	41.4%	*47.4%*	24	62	38.7%	*49.0%*
King	9	77	11.7%	*15.8%*	10	69	14.5%	*13.9%*	16	75	21.3%	*16.4%*
Kizirian	18	58	31.0%	*32.2%*	17	50	34.0%	*40.1%*	14	43	32.6%	*36.9%*

	SY 2016-17				SY 2017-18				SY 2018-19 (YTD as of 2/12/2019)			
	EL IEPs	**Total IEPs**	**EL IEPs as %-age of Total IEPs**	***ELs as %-age of School Total***	**EL IEPs**	**Total IEPs**	**EL IEPs as %-age of Total IEPs**	***ELs as %-age of School Total***	**EL IEPs**	**Total IEPs**	**EL IEPs as %-age of Total IEPs**	***ELs as %-age of School Total***
Lauro	25	105	23.8%	*36.4%*	27	104	26.0%	*37.2%*	21	95	22.1%	*40.3%*
Leviton	27	31	87.1%	*46.5%*	24	29	82.8%	*45.5%*	24	29	82.8%	*51.1%*
Messer	25	88	28.4%	*38.1%*	40	93	43.0%	*45.8%*	35	87	40.2%	*47.9%*
Reservoir	16	22	72.7%	*38.3%*	17	30	56.7%	*40.6%*	15	24	62.5%	*47.6%*
Webster	21	65	32.3%	*29.6%*	27	61	44.3%	*35.7%*	37	64	57.8%	*48.2%*
West	9	49	18.4%	*25.6%*	17	74	23.0%	*26.3%*	17	64	26.6%	*30.1%*
Young & Woods	31	74	41.9%	*51.5%*	36	80	45.0%	*47.2%*	44	91	48.4%	*48.9%*
Middle												
DelSesto	34	174	19.5%	*22.0%*	44	169	26.0%	*23.3%*	65	155	41.9%	*29.8%*
Hopkins	15	99	15.2%	*17.5%*	19	105	18.1%	*20.8%*	21	96	21.9%	*23.2%*
Stuart	31	126	24.6%	*25.5%*	28	112	25.0%	*27.6%*	33	101	32.7%	*33.7%*
Bishop	29	156	18.6%	*14.2%*	33	156	21.2%	*22.2%*	48	138	34.8%	*23.8%*
Greene	30	142	21.1%	*18.3%*	34	120	28.3%	*18.2%*	43	127	33.9%	*21.6%*
Williams	30	135	22.2%	*23.8%*	34	137	24.8%	*27.4%*	31	109	28.4%	*31.7%*
West Broadway	27	94	28.7%	*21.6%*	35	100	35.0%	*25.8%*	34	79	43.0%	*28.4%*
High												
360	2	16	12.5%	*26.1%*	2	27	7.4%	*34.0%*	4	29	13.8%	*36.2%*
ACE	1	25	4.0%	*10.9%*	1	22	4.5%	*10.3%*	2	26	7.7%	*13.0%*
Alvarez	15	69	21.7%	*52.7%*	21	68	30.9%	*57.4%*	23	89	25.8%	*59.1%*
Career and Tech	11	110	10.0%	*8.8%*	9	95	9.5%	*10.2%*	19	101	18.8%	*15.6%*
Central	31	162	19.1%	*36.2%*	30	156	19.2%	*37.9%*	55	186	29.6%	*41.0%*
Classical	1	10	10.0%	*0.1%*	1	6	16.7%	*0.4%*	1	6	16.7%	*0.5%*
E3 (E-Cubed)	5	51	9.8%	*23.9%*	9	52	17.3%	*24.5%*	10	56	17.9%	*24.0%*
Evolutions	3	28	10.7%	*20.9%*	4	23	17.4%	*28.0%*	3	37	8.1%	*30.9%*
Hope	29	263	11.0%	*27.9%*	40	262	15.3%	*27.9%*	60	271	22.1%	*33.1%*
Mount Pleasant	22	201	10.9%	*40.1%*	32	207	15.5%	*41.6%*	49	227	21.6%	*45.1%*
Sanchez	15	94	16.0%	*40.5%*	15	75	20.0%	*36.8%*	17	78	21.8%	*36.4%*
Times2	11	55	20.0%	*7.5%*	10	58	17.2%	*7.5%*	14	66	21.2%	*9.6%*

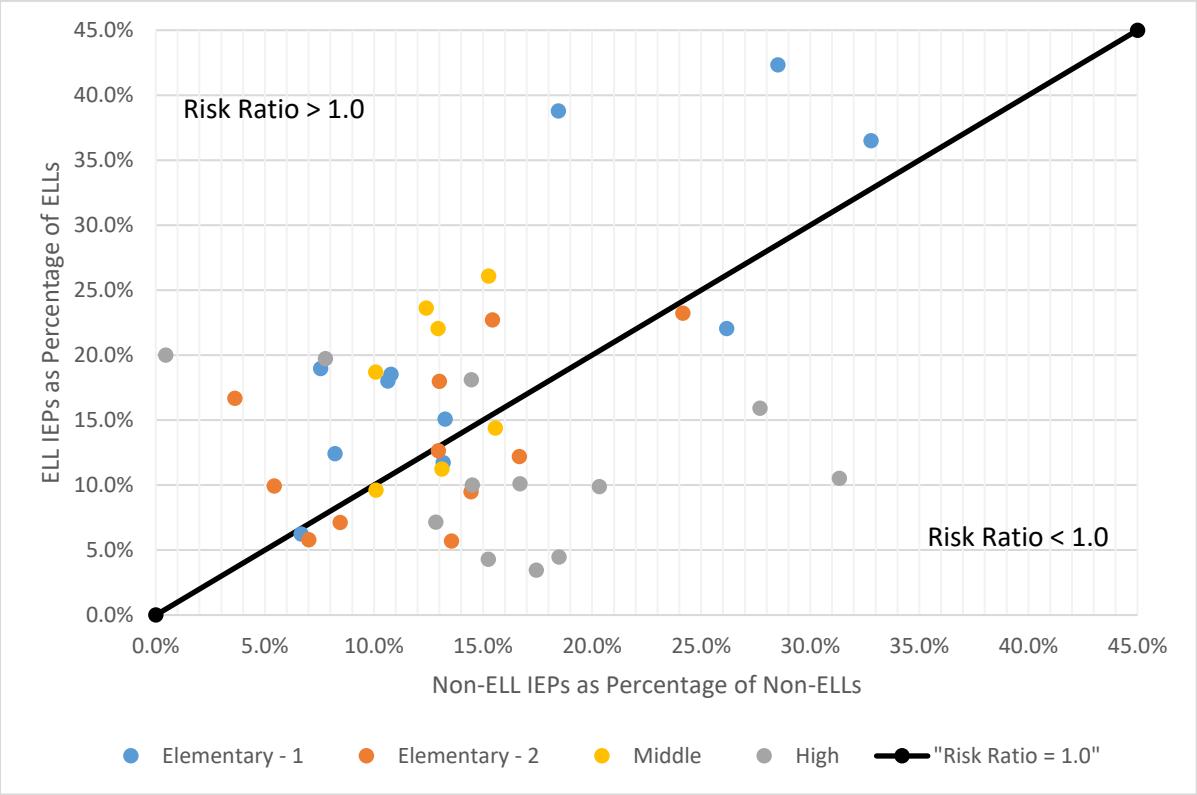
Source: District-submitted data

Disproportionality risk-ratio. The *total number of ELs with IEPs* as a percentage of *all ELs* provided by PPSD was insufficiently large to determine whether ELs were being overidentified for special education. A comparison with the identification rate of Non-ELs is required and should be calculated using a disproportionality risk ratio. This risk ratio compares the respective rates at which ELs and Non-ELs are identified as requiring an IEP. Using school-level data, the Council calculated the risk-ratios for each of the schools, and we plotted these in Figure 30. When the relative percentages of ELs with IEPs and Non-ELs with IEPs are similar, the risk ratio is close to 1

and, therefore appears as a dot closer to the 45-degree diagonal on the graph. The y-axis shows the ratio of ELs with IEPs to total ELs, and the x-axis shows the ratio of Non-ELs with IEPs to total Non-ELs. In schools that are above the diagonal, ELs are identified as requiring special education at higher rates than Non-ELs are. In schools that appear below the diagonal, ELs are identified as requiring special education at a lower rate than Non-ELs. These risk-ratios do not necessarily mean that ELs are being over- or under-identified, but rather that there is a need to further examine the referral and screening processes. Similarly, even if the ratio were close to 1, it does not mean that all is well. A risk ratio of *one* can also be the result of both ELs and Non-ELs having high rates of identification for special education.

The dots represent the risk ratio for each school, and they are color-coded by zone to help illustrate the number of schools per zone that may have risk-ratios that require further examination.

Figure 30. *EL IEPs as Percentage of ELs* vs. *Non-EL IEPs as Percentage of Non-ELs*, SY 2018-19 as of 2/12/2019

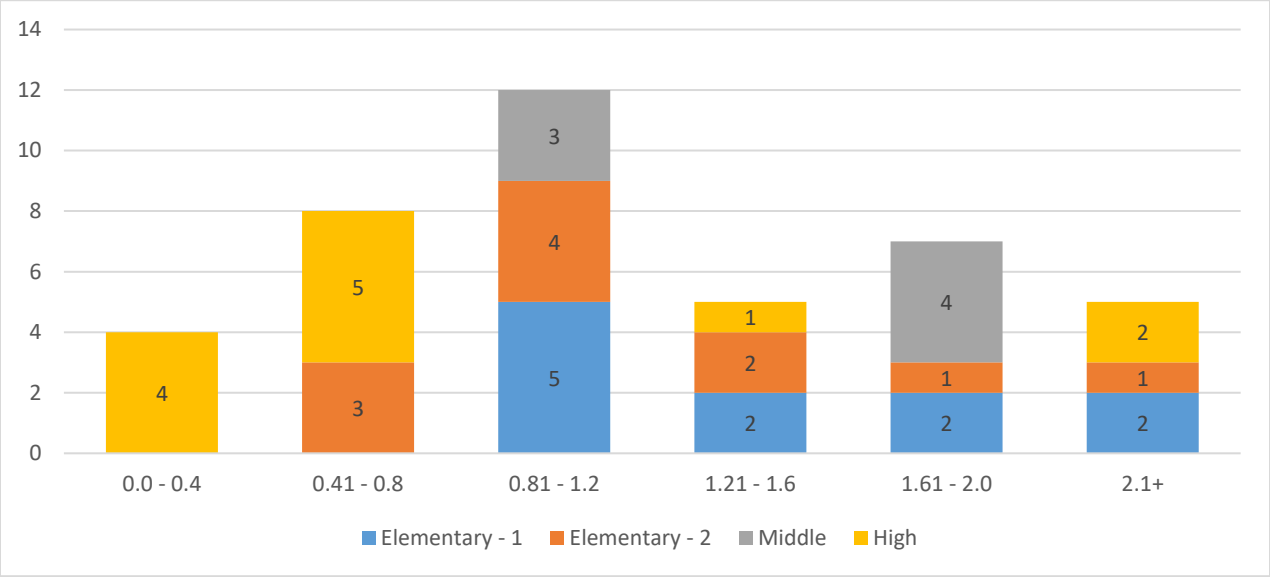


Source: Council analysis using district-submitted data

An examination of school-level risk ratios shows that Elementary Zones 1 and 2 have the largest numbers of schools with risk-ratios that approximate ***one (***ranging from .81 to 1.2). The majority (3 out of 4) of middle schools showed risk-ratios in which ELs had higher rates of identification for special education; three fell within the .81 to 1.2 range. The risk ratios for ELs in high school, showed potential under-identification of ELs; nine high schools had risk ratios under .8. Three additional high schools showed risk ratios that indicated potential over-identification of ELs; two

had ratios greater than two. In other words, ELs were twice as likely to be identified as requiring an IEP as Non-ELs.

Figure 31. Number of Schools by Special Education Risk Ratio and Zone, SY 2018-19



Source: District-submitted data

Note: SY 2018-19 as of February 12, 2019

Table 24. Special Education Risk Ratios, SY 2016-17 to SY 2018-19

Sorted by SY 2018-19 Risk Ratio within School Level in SY 2018-19

	SY 2016-17			SY 2017-18			SY 2018-19 (YTD as of 2/12/2019)		
	EL IEPs as %-age of ELs	Non-EL IEPs as %-age of Non-ELs	Risk Ratio	EL IEPs as %-age of ELs	Non-EL IEPs as %-age of Non-ELs	Risk Ratio	EL IEPs as %-age of ELs	Non-EL IEPs as %-age of Non-ELs	Risk Ratio
Elementary Zone– 1									
Lima	25.7%	9.1%	2.83	25.9%	8.7%	2.96	19.0%	7.6%	2.51
Gregorian	20.0%	14.5%	1.38	32.0%	14.9%	2.15	38.8%	18.5%	2.10
Veazie	16.8%	11.3%	1.49	16.7%	11.0%	1.51	18.5%	10.8%	1.72
Feinstein at Sackett	14.1%	14.8%	0.95	17.0%	14.5%	1.18	18.0%	10.6%	1.69
Spaziano	18.1%	8.1%	2.23	18.6%	8.2%	2.27	12.4%	8.2%	1.51
Carnevale	37.1%	27.0%	1.37	37.4%	27.3%	1.37	42.3%	28.5%	1.48
Kennedy	10.5%	12.0%	0.88	12.6%	12.6%	1.00	15.1%	13.3%	1.14
Pleasant View	37.0%	36.6%	1.01	42.6%	34.4%	1.24	36.5%	32.8%	1.11
Feinstein at Broad	5.8%	8.4%	0.69	8.4%	5.6%	1.49	6.2%	6.7%	0.93
D'Abate	15.0%	9.1%	1.65	14.9%	12.3%	1.22	11.7%	13.2%	0.89
Fortes	28.4%	26.4%	1.08	29.5%	22.6%	1.31	22.0%	26.2%	0.84
Elementary Zone– 2									
Leviton	19.4%	2.5%	7.77	18.0%	3.1%	5.74	16.7%	3.6%	4.60
Reservoir	12.9%	3.0%	4.30	13.0%	6.8%	1.92	9.9%	5.4%	1.83

	SY 2016-17			SY 2017-18			SY 2018-19 (YTD as of 2/12/2019)		
	EL IEPs as %-age of ELs	Non-EL IEPs as %-age of Non-ELs	Risk Ratio	EL IEPs as %-age of ELs	Non-EL IEPs as %-age of Non-ELs	Risk Ratio	EL IEPs as %-age of ELs	Non-EL IEPs as %-age of Non-ELs	Risk Ratio
Webster	17.8%	15.7%	1.13	19.7%	13.8%	1.43	22.7%	15.4%	1.47
King	9.2%	13.1%	0.70	11.5%	11.0%	1.05	18.0%	13.0%	1.38
Young & Woods	7.3%	10.7%	0.68	10.5%	11.5%	0.92	12.6%	12.9%	0.98
Bailey	25.0%	22.1%	1.13	29.6%	20.9%	1.42	23.2%	24.2%	0.96
West	3.8%	5.8%	0.65	7.6%	9.0%	0.84	7.1%	8.5%	0.84
Kizirian	8.0%	8.4%	0.95	6.0%	7.8%	0.77	5.8%	7.0%	0.83
Messer	10.4%	16.2%	0.64	13.8%	15.5%	0.89	12.2%	16.7%	0.73
Fogarty	11.8%	11.9%	1.00	11.2%	14.2%	0.79	9.5%	14.4%	0.66
Lauro	6.8%	12.4%	0.55	7.5%	12.6%	0.59	5.7%	13.6%	0.42
Middle									
West Broadway	21.3%	14.5%	1.47	25.2%	16.3%	1.55	23.6%	12.4%	1.90
Greene	15.2%	12.7%	1.20	17.2%	9.7%	1.78	18.7%	10.1%	1.86
Bishop	26.4%	19.0%	1.38	17.6%	18.8%	0.94	26.1%	15.3%	1.71
DelSesto	15.3%	17.8%	0.86	18.1%	15.7%	1.16	22.0%	12.9%	1.70
Stuart	12.4%	13.1%	0.95	10.2%	11.6%	0.88	9.6%	10.1%	0.95
Hopkins	12.9%	15.4%	0.84	14.5%	17.2%	0.84	14.4%	15.6%	0.92
Williams	13.6%	14.9%	0.91	13.1%	14.9%	0.87	11.2%	13.1%	0.86
High									
Classical	100.0%	0.8%	126.44	25.0%	0.4%	56.40	20.0%	0.5%	43.40
Times2	19.3%	6.3%	3.06	17.9%	6.9%	2.57	19.7%	7.8%	2.54
Career and Tech	17.7%	15.4%	1.15	12.3%	13.4%	0.92	18.1%	14.5%	1.25
E3 (E-Cubed)	4.5%	13.1%	0.35	8.0%	12.4%	0.65	10.0%	14.5%	0.69
Central	6.4%	15.3%	0.42	5.5%	14.2%	0.39	10.1%	16.7%	0.60
Hope	9.4%	29.5%	0.32	11.9%	25.7%	0.47	15.9%	27.7%	0.57
ACE	4.0%	11.8%	0.34	4.5%	10.9%	0.42	7.1%	12.8%	0.56
Sanchez	5.0%	17.9%	0.28	7.2%	16.8%	0.43	9.9%	20.3%	0.49
Mount Pleasant	5.0%	27.5%	0.18	6.6%	25.8%	0.26	10.5%	31.3%	0.34
360	3.8%	9.5%	0.40	2.2%	14.5%	0.16	4.3%	15.2%	0.28
Alvarez	4.1%	16.4%	0.25	4.3%	13.1%	0.33	4.5%	18.5%	0.24
Evolutions	6.8%	15.0%	0.46	6.2%	11.4%	0.54	3.4%	17.4%	0.20

Source: District-submitted data

Meeting the needs of ELs in special education is a common challenge faced by all school districts due to the heightened complexity between how language is acquired and how disabilities are diagnosed. The diagnostic process for identifying disabilities is typically complex, but it becomes more so when diagnosing students whose dominant language is not English. Once diagnosed, however, the challenges for the district then involve having the necessary staff for services and instruction. For schools, the challenges involve the logistical challenges of master scheduling to

meet the needs of ELs in special education. The data shown above on ELs in special education show that the challenges within Providence Public Schools are significant.

Both the DOJ review and the Johns Hopkins review confirmed this point, but team interviews with PPSD staff indicated that the issues were not new to educators in the district. Several staff members cited challenges in *accurately identifying special needs* in the EL population. Some of these challenges included—

- An outdated guidance document that fails to provide information on the best practices and instruments for identifying special needs in populations who are not English dominant or proficient in English.
- Lack of understanding across schools of the referral process that generates disparate identification rates, whereby in some schools, many ELs were rejected, while in other schools there was a high rate of EL identification. According to those interviewed by the team, the referral rates of ELs to special education were high, especially in the elementary grades, where there has been a spate of parent referrals that, according to staff, may be "for not learning enough English."
- A reliance on paper-based portfolios that are difficult to update and make it hard to keep all relevant team members informed.
- Professional development needed by staff, especially in early learning, to ensure that ELs are not misdiagnosed as having speech-related disabilities.
- Teachers reported that there were no interventions for ELs in middle and high school and that some personnel believed that ELD was the right intervention for ELs.
- Lack of multi-disciplinary teams (e.g., psychologists, occupational therapists, ESL teachers, etc.) qualified to accurately distinguish special needs from second language acquisition issues among ELs. Many staff do not know how to differentiate language needs from disabilities.
- No integrated system for special education data collection and reporting. PPSD currently uses at least three distinct systems (i.e., Skyward, paper and pencil, and EasyIEP™). Staff indicated that the district was looking for an alternative system that better integrated all components. A further challenge related to integrating special education data collection was making sure that EL-related data were collected or integrated with the special education data system.

Need to improve instruction and services for dually identified students. Staff were clear about the need to improve the *instruction* that ELs in special education receive. The most serious illustration of this need was the 700 students who were dually identified as ELs with special needs who were not being provided EL-related services. Staff indicated that special education teachers were not ESL-certified to provide ELD/ESL services and there were insufficient numbers of ESL teachers to push-in to special education classes, despite the five additional teachers budgeted at the central office level. The Council subsequently learned that these five additional positions that were programmed for SY 2019-20 were eliminated due to the budget office's not setting aside the funding. Discussions with staff revealed that there was also a substantial need to understand

how to serve ELs with special needs from the point of identification to the point of placement. Other concerns raised by staff included—

- Too many students were being served in self-contained classes rather than in more inclusive settings, which is considered best practice.
- ELs with special needs were not provided full access to core content and instruction.
- Site-based decisions related to services resulted in a wide range of approaches, models, and systems to meet student needs. Coordinating EL services with a wide range of special education settings and approaches was difficult and staff-intensive.
- The need for professional development on how EL and special education teachers could work together either in collaborative or push-in models, as well as in common planning time, to address the needs of ELs with disabilities was extensive.

Recommendations

Providence schools continue to be challenged by the complexities of accurately identifying and serving ELs with special needs on a timely basis using qualified staff. This challenge was identified in the Council's 2012 report as well as in the DOJ findings. The team makes the following recommendations to improve the screening, identification, and coordination of special education services for ELs—

94. Charge the Office of Specialized Instruction to work with the Office of ELs to create regionally-based staff cohorts who would prioritize how to meet the needs of ELs in special education. The risk ratio calculations provided in this section offer the first level of prioritization, focused on high schools and middle schools with the lowest (a total of four schools with ratios between 0 and 0.4) and highest risk ratios (a total of six schools with ratios between 1.61 and 2.1). A similar prioritization should be done for elementary schools with risk ratios either on the low or high ends of the spectrum. The work should entail:
    - Ensuring that the proper screening was conducted for accurate diagnosis;
    - Ensuring the placement and scheduling of ELs with IEPs; and
    - Prioritizing the provision of both EL services and special education for ELs with IEPs.
95. Charge the Office of Specialized Instruction and the Office of ELs to work with the Human Resources Office to strategically recruit a multidisciplinary team that would include psychologists with experience working with ethnically and racially diverse populations and diagnosticians who have experience with language acquisition. This team should be charged with developing districtwide protocols and procedures for diagnosing and placing ELs with disabilities. Each school should not be trying to do this on their own. This team's work should also be integrated into the district's Multi-Tiered Systems of Support (MTSS) or Response to Intervention models.
96. Charge the Office of ELs with working with the Office of Specialized Instruction to develop and execute a plan to provide targeted professional development systemwide to improve the capacity of teachers and related services personnel with meeting the needs of ELs in special education. The plan should include:

- Professional development for school teams or, at a minimum, regional teams to provide a clear understanding of the referral processes for ELs who need screening for learning disabilities;
- Professional development for special education and EL teachers to know how to effectively work together in *collaborative* settings; and
- Using IDEA funds to support special education teachers in obtaining EL certification, using the partnership with Roger Williams University.

97. Charge the Offices of Specialized Instruction and ELs with jointly developing sample student placements that improve inclusion rates, considering the type of disability and level of English proficiency. Students at higher levels of English proficiency and fewer severe disabilities could be better integrated into general education classes with teachers who have the qualifications to meet the needs of ELs and students with IEPs.

98. Charge the Offices of Specialized Instruction and ELs with updating the guidance manual for principals and teachers on accurately identifying special needs in ELs and properly placing students for services. Ensure accurate record keeping.

H. EL Data Reporting and the DOJ Agreement Compliance

Findings

The Office of Research, Planning and Accountability (RPA) handles data access, reporting, and monitoring of systemwide performance, according to interviews with PPSD staff. Responsibilities include database management, data warehousing, data governance, and data visualizations to support schools. A performance and accountability specialist also works with the unit, while another handles online assessments. The Council team learned from staff that the data systems in PPSD do not communicate with each other properly and that EL data are not reported in ways that are easily accessible or useful for planning or decision-making. The team also earned that school-level staff interact with at least three data systems—Skyward, ELLevation, and Tableau. The Council found that—as was reported in 2012—EL-related data needs were not reliably supported systemwide. RPA staff shared that the research and data supports on special populations, such as ELs, ceased when funding became unavailable. More recently, RPA realized two vacancies when the people who were handling the DOJ requests resigned.

At the district-level, it was unclear to the Council team whether specific personnel were charged with and held accountable for reviewing EL data. District staff members indicated that they were unable to fulfill data requests for enrollment by EL program model due to “inconsistent and unreliable” information. Part of this is a result of inconsistent definitions and applications of program models. In addition, staff indicated that obtaining reliable and accurate data on EL enrollment was problematic and took too long. It was evident to the team that there was no single point of contact in the Research, Planning, and Accountability (RPA) office assigned to handle EL-related data and reporting requests related to the DOJ Agreement. Other noted limitations included—

- RPA has not coded the EL 'type of program' and what RIDE (in SKYWARD) calls 'student type.'
- Coding reflects 'seats' rather than students.
- RPA does not handle the Registration data on 'seats.'
- RPA does not have an internal process for handling requests that are made by the Mayor's office, school board, and staff. Requests have generally been handled in a reactive manner rather than through a regularly programmed set of reports and protocols.
- The Data Governance Board that began in August/September 2018 does not include the EL Office, unless an issue deemed relevant arises. However, it was not clear to the team that Non-EL Office members of this board would know when something is relevant.

The data requests from the Council to prepare this report and data provided to DOJ had numerous inconsistencies and errors, making it difficult to fully understand the condition of ELs in the district. It was evident that staff in the EL Office and the RPA office were needed to handle ongoing data requests from DOJ.

Staff interviewed by the Council team also indicated that data on how long an EL was in program or what English proficiency levels were often had errors. (We report these data earlier in the report, but a cautionary note is included.) Staff indicated that there were challenges with interoperability of the various data systems, especially for EL data, and that data cleaning was difficult since RPA did not handle data entry. The Registration Office enters EL data.

The Council's independent review of data files submitted by Providence Public Schools confirmed the limitations and challenges described by staff in obtaining complete and clean data to understand key EL characteristics, such as language proficiency, program placement, and time in program—all essential elements for program design and improvement. The data sets received had missing data, and we were unable to confirm the accuracy of some data, which precluded a comprehensive analysis. Some of the challenges we identified included—

- **Initial placement and exit dates were not provided.** All enrollment and exit dates in student-level data were no older than 2018, seemingly providing enrollment in school within a specific school year rather than initial EL program or reclassification. Without the exact dates of initial placement and exit, we were unable to verify the "number of years in the EL program" that were reported in the student-level file and the file containing ACCESS proficiency levels by time in program. It is also worth noting that the maximum number of that shown in the student-level file was 14.9 years, a length of time similar for a number of students. The district needs to examine these data more closely to determine why ELs would remain in program for nearly their entire K-12 experience or assess whether these were errors.
- **Some ACCESS placement scores were beyond the range of possible scores.** In several cases, scores above the maximum of six were recorded for students. Commas and misplaced decimals resulted in errors such as 10, 30, and 60, while others like "8" listed for a student's listening score were difficult to explain.

- **Scores for all language domains were not reported.** Many kindergarten students only had speaking and listening scores, as might be expected. However, there were instances where students in higher grades had scores in these domains but not in reading and writing—as one would expect. (They often appeared as blank cells or *NA*). For some students coded as having been placed in an EL program, there were no scores whatsoever.
- **Incomplete data were reported for many students.** Beyond missing domain scores on the screener assessment, as noted in the previous bullet, data on key measures/indicators were missing for a substantial number of students in the student-level file. For example, 1,790 of 8,228 ELs (approximately one-fifth of all ELs) did not have a reported language screening date. Furthermore, around the same portion of ELs (21.7 percent or 1,783 of 8,228 ELs), had an empty field for the name of the screener assessment.

The lack of consistent and dedicated attention to EL data continues to leave staff, both in the central office and schools, without access to timely and accurate information on EL achievement or progress. It was not a surprise to the Council team, then, to hear that school-level administrators seemed unfamiliar with data on EL programming, EL placements, or performance in their schools.

The EL Office has created a data collection instrument for tracking professional development hours and instances when teachers were participating in various DOJ Agreement requirements. Staff reported that the Curriculum and Instruction unit was also handling data from Frontline (professional development tracking software) to generate needed reports. This collaboration is vital if the district is to provide better services not only to EL students but all students.

Recommendations

The district's ability to comply with the DOJ Agreement will require a strategic investment in data collection, reporting, and analysis of EL-related data—from registration and placement to year-over-year programming and outcome indicators. One of the more taxing mandates of the Agreement is a requirement for a longitudinal cohort analysis for each of the programs used in schools. This kind of analysis will be challenging not only because of the fragmented and unreliable nature of the current data, but also because PPSD does not have a history of conducting these kinds of analyses for any student group.

99. Have the EL Office leadership work with staff from PPSD Research, Planning, and Accountability meet with their counterparts in the Boston Public Schools to understand how they built and staffed their EL reporting system and their protocols to meet the requirements of Boston's DOJ Agreement. (The Council can arrange this meeting.)
100. Convene a meeting between the district's current EL data-system service provider and the Research, Planning, and Accountability (RPA) office to determine needed fields and regular reports, including codes that will allow the district to calculate the number of years in program for each EL.
101. Augment staff in both the EL Office and RPA to handle EL data collection, management, and reporting for ongoing PPSD needs as well as meeting DOJ-specific data reporting

requirements. If modeled after the staffing pattern in a similar urban district under a DOJ Consent Decree, the staffing configuration might include the following positions reporting to the Director of EL—

- EL Compliance (Assessment, Evaluation, and Oversight)—this position would handle compliance issues related to EL policy, including the review of EL data reports to identify areas needing attention. The position would require a candidate with mastery of Excel, data analysis, data interpretation, and data visualization in order to analyze data and crosswalk between district practices and legal requirements. This position would also support the EL Director in developing plans for providing general guidance on preventing non-compliance. Duties would include overseeing and leading a team in the design and production of a final report to comply with various regulatory mandates, along with reports subject to the DOJ Settlement Agreement. Under the guidance of the EL Director, the position would generate reports to provide internal and external stakeholders with actionable information on EL services and academic outcomes.
- EL Accountability Program Manager—this position would be responsible for creating and maintaining an internal tracking system to ensure that EL data are updated and accurate for overall program monitoring purposes and to generate DOJ-required reports. This manager, working with the Providence Public Schools Office of RPA, would prepare reports required by the DOJ Settlement Agreement to the U.S. Department of Justice. The candidate would also organize and synthesize relevant information for correspondence, reports, memoranda, and other communications by senior staff.

Reporting to the RPA office would be an—

- EL Technology and Data Manager—This position would be an EL-dedicated position in the Data and Research office to monitor EL data quality, work closely with the data-dedicated staff in the EL Office to generate required reports in compliance with the DOJ Agreement, as well as other external stakeholders.

102. Charge the EL Office to work with the Office of RPA to conduct a careful analysis of ENE waivers by type of waiver based on when and who initiated the waiver request and for what reason. This analysis would be disaggregated by school and reported by zone to provide the EL Director with the necessary information to assist Zone Executive Directors and principals. Data would also be mined to develop parent-friendly information on EL services.
103. Have RPA meet with the Director of Research from the Council of the Great City Schools for assistance in developing a plan for a three-year cohort analysis.
104. Create a school-level data team with a data lead and instructional decision-makers (e.g., administrators, coaches, teacher leaders) to study EL data, inform school improvement processes, and work with teachers to cultivate awareness of EL performance and decision-making based on data. This team would provide feedback on types of information that schools need for a data dashboard. Data teams would have responsibility for checking the EL Data Dashboard in order to monitor services and achievement. Data access protocols should define who needs to have access to the data and be able to detect when timely action is needed to support ELs. Access and reports should be customized for principals, EL

specialists, EL coordinators/coaches, content area lead teachers, EL teachers, and others that the group determines are necessary.

105. Charge the RPA with exploring a long-term partnership with a local university to expand PPSD capacity for ongoing program evaluation. Similar research consortia have allowed urban districts (e.g., Chicago, Boston, and New York City) to jointly determine research questions and initiatives that help improve the performance of students in their respective districts.

I. Budget and Finance

Findings

A variety of funding streams are available to support EL programs in the Providence schools. Staff indicated that $1.6 million in state categorical funds were used to hire additional staff, but several staff expressed concerns that these funds were reportedly being used to hire general education teachers. (The district should have an audit conducted to ensure that this is not the case.) Of the total $54.5 million in federal funds received in SY 2018-19 and reported in the Providence school budget, only Title III funds ($1.3 million) were listed as supporting English learners. Staff indicated that Title III funds supported five EL specialists, who provide support to teachers and school administrators across the district. Providence Public Schools has a professional development committee that decides how to allocate funds for professional development. Of the $3.5 million in Title II funds, $900,000 were allocated to support EL programs, and $250,000 of $21 million in Title I funds were allocated for EL-related professional development. Staff reported that schools do not spend down all their allocated professional development funds, returning around $150,000 to the district each year.

Title I. Staff reported that Title I funds included $12 million for schools, including 19 non-public schools, and $10 million for math and reading coaches. Other Title I-funded activities included in the SY 2018-19 budget went for parent involvement, after-school programs, elementary childhood programs, K-1 teacher assistants, and school-directed initiatives.[98] However, neither the budget document nor interviews with staff indicated whether any of these activities supported ELs specifically.

Mayoral initiatives. The Council team confirmed that there were $128.5 million[99] in local funds from the mayor. This city share supports a number of mayoral initiatives that includes providing school culture coordinators. The city website describes these positions as promoting a positive school climate and increasing student engagement in middle schools. The activities as described in a city announcement were not focused on any specific student group but would certainly include ELs. The Council team did not hear, however, about how the school culture coordinators

[98] Providence School Department SY 2018-19 Budget Executive Summary Providence Schools Budget, May 7, 2018, p.14
[99] Ibid. p.30

specifically supported ELs.[100] Moreover, staff reported that the school culture coordinators asked the EL Office for assistance.

Budget process and 'seats.' The budget process was described by staff as including a predictable per-pupil allocation for supplies and materials based on school enrollment. Staffing allocations, however, were done through central office negotiations with Zone Executive Directors and principals at meetings in which they identify positions needed. During interviews, staff often expressed frustration with the budgeting process, which results in artificially suppressing the number of 'seats' for ELs. For one, the enrollment figures that form the basis for next year's budget are determined in January of the previous school year. Staff indicated that EL enrollments continued to rise throughout the year and that the budgets were already out-of-date before the current school year ended and the new one began. Accurate projections of EL enrollments by the New England School Development Council (NESDEC) have not been produced for several years. Staff from both the central office and the individual schools find the budget process to be a bad fit for the district. A few additional examples illustrate this point—

- No formal projections of EL enrollments are used in constructing next year's budget; actual figures are used as the base.
- Making projections of the number of ELs by WIDA level is extremely difficult for budget and programming purposes and mid-year budget adjustments are typically not allowed.
- The city does not work with PPSD to create models for more accurately projecting enrollments. Principals and Zone Executive Directors cannot accurately project growth in crafting their budgets.
- The financially dependent nature of PPSD creates unproductive and overly bureaucratic steps for approving new positions. In fact, the city was reported to often intrude in school district operations, such as reviewing new hires for new positions and running city-sponsored summer programs.
- Schools seem to experience the budget process as a black box, with the finance director as the gatekeeper to whom principals need to make their case to receive additional FTEs. Making a strong case in the absence of reliable data would seem to be a difficult task.
- Allocation of various funding streams does not appear to equitably support the multiple facets of EL education. For instance, ELs make-up more than 30 percent of total enrollment, but many schools have EL enrollments that exceed 40 percent. It was not clear to the team that the distribution of categorical aid (e.g., Title I, II, IDEA) was steered in an equitable manner to support EL needs.

In addition, the school system's preference for open choice schools increases demand for transportation services and weakens the network of neighborhood schools. Some schools reportedly had up to 13 buses serving them. The costs associated with citywide transportation can be significant.

[100] City of Providence. (n.d.). Providence hires school culture coordinators. Retrieved September 4, 2019, from http://www.providenceri.gov/providence-hires-school-culture-coordinators/

Department staffing levels. Finally, the Council notes that the district needs to review relative staffing levels in the district with special attention to district non-instructional operations and academic supports. For comparison purposes, we grouped offices according to general categories (i.e., whether the activities directly supported instruction or whether the activities were more operational or financial in nature). (See Table 25.) The analysis showed that there were higher staffing levels in offices that handled budget, finance, human capital, data, and purchasing, compared to offices that supported instruction and instructional delivery in schools. For instance, the operation-related offices had an average of eight FTEs, while the academic-related offices had an average of 3.5 FTEs. Eight of the 12 academically related offices had only one or two FTEs, while only four of 16 operational offices had one or two FTEs.[101] A study conducted in 2015 by Mass Insight Education made similar observations about the lean instruction-related staffing levels in the central office, compared to other districts in Rhode Island.[102]

Table 25. FTEs by Department

SY 2018-19 Budget	FTE by Funding Source		
	Local	Non-Local	Total
Academic and School Operations Departments			
Office of Chief Academic Officer	2		2
Curriculum Development & Implementation	2	1	3
Advanced Academics	0.38	0.13	0.51
Fine Arts	0.38	1.13	1.51
Literacy & Humanities	1.5	5.5	7
Language & Culture	4	7	11
Mathematics	0.75	4.75	5.5
Health and Physical	1		1
Science	0.75	0.75	1.5
Elementary Zone 1 and Zone 2	1.5	0.5	2
Secondary Zone	1.75	0.25	2
Office Multiple Pathways	1	1	2
Subtotal	17.01	22.01	39.02
		Average FTE	*3.5*
Community Information and Engagement			
Chief of Administration (includes ED of Engagement)	4	0	4
Communications	2	1	3
Family and Community Engagement		6	6
Student Registration Center	16		16
Subtotal	22	7	29
		Average FTE	7.25
Personnel, Research, Finance, and Operations			
Research and Assessment		8	8
Office of Operations	5.5		5.5
School Operations & Student Support	2		2

[101] Providence Schools SY 2018-19 Proposed Budget May 2019

[102] *Providence Public Schools: An Assessment of the Need for District Transformation To Accelerate Student Achievement*. Matt Bachand and Nora Guyer Mass Insight Education May 2015, p.6

Food Service		2	2
Human Resources	23.5	4.5	28
Human Capital	5	4	9
Finance	2		2
Budget	5		5
Central Supply	5.7		5.7
Controller's Office	22		22
Data Processing	4		4
Grant Oversight	0.3	3.7	4
Information Services	17		17
Medicaid Reimbursement	1		1
Plant Operations	3		3
Purchasing	6		6
Subtotal	102	22.2	124.2
		Average FTE	7.76
Miscellaneous—focused population/activity			
Office of Specialized Instruction	80.45	13.35	93.8
Transportation	110		110
Crossing Guards	100		100
Health Office	9.3		9.3

Recommendations

Most of the recommendations the team suggests below fit into the larger context of the system's improvement and strategic resource allocation that Providence Public Schools will need to examine as part of its overall reforms.

106. Charge the Director of Teaching and Learning with including the EL Office in the determination of allocations for professional development and Title I allotments.

107. Consider holding a portion of the district's Title I allocation centrally for districtwide professional development with Title I-eligible schools around supporting the new EL program initiatives.

108. Charge the EL Director to work with the Human Resources and Budget Offices to explore the possibility of withholding a portion of the district's categorical and general education funds to fill EL teacher FTEs mid-year when actual enrollment figures result in discrepancies with projected budget figures. The Office of Specialized Instruction currently holds a certain number of teacher FTEs for this purpose. Similarly, fund with general funds and categorical state funds additional positions in the EL Office to specifically focus on supporting the implementation of quality EL programming. See related recommendations in the *Staffing* section that outline the positions that need to be filled for purposes of improving overall ELL services and meeting the various requirement of the DOJ Agreement.

109. Create a senior level working group with Zone Executive Directors, the Chief Academic Officer, directors of budget and grant funding, and the Chief of Human Capital to redesign the budget process in a way that would provide more predictability and transparency in school-level allocations for staffing and programming. Consider using a weighted student formula system. (See related recommendations in *Staffing* section.)

Build into the budgeting process the ability for the EL Office to sign-off on EL-related staffing, as is done in Boston, a district also complying with a DOJ Agreement. The working group may wish to consider looking at Boston documents and templates for staffing and budget models to ensure compliance with the DOJ Agreement.

110. Explore governance and funding protocols to ensure that city allocations, such as the $128 million, support activities that are aligned to PPSD-determined priorities. In addition, if $128 million remains in the budget for cultural coordinators, ensure that language-related activities are included in the cultural programming. For instance, cultural coordinators might play a role in ensuring that school environments, including the front office, are welcoming to families and students who speak other languages.

111. Charge the budget office to work with Zone Executive Directors to create training opportunities and tools for principals and school leaders responsible for budget-related decisions to maximize the use of school allocations in line with school and district priorities. Principals currently receive minimal guidance in making their budget requests or in purchasing their "tools of the trade." Guidance around purchases, including professional development, would help maintain a focus on district priorities that the central office could better support. This might also help reduce the amount of professional development funds that are returned to the district.[103]

112. Charge the Directors of Budget and Operations to work with the EL Director and Zone Executive Directors to create a purchasing protocol that identifies expenditures and purchases that would require extra layers of approval. For instance, EL-related purchases could be flagged, and the respective Zone Executive Director and EL Director would receive a notice to jointly ensure that the expenditures are aligned with EL priorities and DOJ remedies. Similarly, certain school improvement purchases (CSI and TSI schools) might also require additional scrutiny to ensure they meet federal guidelines on program effectiveness.

113. Examine budgetary and operational processes in PPSD and the city to identify areas where streamlining could free funds for academic activities in schools.

V. Synopsis and Discussion

The report that the Council of the Great City Schools wrote in 2012 on the district's EL programming was a tough review but one that Providence Schools saw as important to improve EL achievement. The Council saw in this latest review that some of the 2012 recommendations were implemented. Yet, the Providence schools face even greater challenges in 2019 as EL enrollment outpaced district improvement efforts. Part of this devolution is the result of outside forces, but part of the situation must be laid at the doorstep of the district, which did not respond aggressively enough to the Council's findings and recommendations when they were first issued. Providence Public Schools has known for some time that its EL enrollment was increasing and

[103] Finance/Operations Information and Procedures Handbooks. Providence Schools

diversifying; it has also known about the shortcomings it had on this front for some time. For instance, PPSD did not address the hiring and teacher preparation issues identified in the 2012 report, now further exacerbating EL teacher shortages emerging from predictable EL enrollment increases. Most concerning is that PPSD allowed the deficit mindset about ELs that the Council saw in 2012 to grow among its educators. In addition, external players, such as the office of the mayor, the city council, teacher's union, the school board, the state, and others have foisted their own priorities on the schools, superseding the needs of the city's children. Few are blameless in the situation in which Providence Public Schools now finds itself.

Moreover, the Department of Justice's review echoed much of what the Council found in its original review in 2012. The recent report by John's Hopkins, [104] commissioned by the state, intensified the sense of urgency that something must now be done—and now is the time to do it.

Now, the challenges to improving instruction and services for ELs will be harder to meet, because attitudes have hardened, practices have further ossified, and interests are even more entrenched.

In this second EL program review, the Council found many of the same structural impediments that were present in SY 2011-12. The district has the same poorly articulated and defined bilingual education programs that it had originally. It has the same "seat" allocation system that restricts program placements. It has the same incoherent programming for ELs across grades and schools that it had seven years ago. It has the same "preference sheets" that allow educators to opt out of educating English learners. It has the same enrollment projection and budgeting system that institutionalizes inadequate services for ELs. It has the same "hours of ELD/ESL" as it did. And it produces the same poor linguistic and academic results.

To make matters worse, the general education program for many students in the district is not much better. The overall curriculum is poorly defined, weakly supported, and allowed to be implemented however schools want. The comeuppance is that even if the bilingual system were in good shape, students would still be subjected to an overall instructional program that is not capable of producing good results for most students.

Moreover, the district seems to have very little capacity to improve or to improve the capacity of its people to produce stronger results for its children. Professional development exists, but it is not evaluated for impact on student outcomes. In addition, staff are poorly deployed. Particularly troublesome is that there is little understanding in the system of second language acquisition or what constitutes effective instructional practice for ELs. This lack of understanding will continue to hinder the effectiveness of PPSD educators working with ELs, leaving many students without the English skills or content expertise to succeed beyond high school.

Finally, the team found that there was little expectation at the systems level that ELs would be fully integrated into districtwide priorities such as CSI- and TSI-related school improvement, MTSS implementation, new teacher induction, materials adoption, budgeting and staffing, or data and

[104] Johns Hopkins Institute for Education Policy. (2019, July). *Providence Public School District in review*. Johns Hopkins University School of Education.

evaluation efforts. For all intents and purposes, about one-third of the district's enrollment is invisible.

The Council offers many actionable recommendations to improve PPSD's EL program. These proposals fall into six overarching categories:

A. ***Well-defined EL program models across PPSD.*** Establish clearly defined instructional program models for ELs that are driven by the number of ELs enrolled—not by artificially determined seats. Provide necessary and predictable resources to sustain the programs strategically and locate them to maximize opportunities for ELs to participate in high quality programming.

B. ***Adequate staffing of EL Programs***. Provide adequate staffing for EL programs at the school level with adequate numbers of qualified teachers and EL Coordinators/Coaches to provide necessary job-embedded supports for teachers.

C. ***Strengthen the role of principals for hiring and accountability for ELs***. EL programs in schools require a stable cadre of qualified EL teachers that are defined by clear teacher certifications and EL qualifications. Principals should have an expanded role in selecting qualified EL teachers to deliver a coherent EL program model, and principals should also be held directly accountable for the proper placement of ELs and the quality of EL program models. At the same time, principals should not be left to their own devices in such an open-ended site-based management system where almost nothing is defined. At the central office, accountability for ELs and compliance with the DOJ Agreements should extend across departments with direct roles in data collection and analysis, curriculum, human resources, budgeting, and zones.

D. ***School supports and quality professional development for teaching ELs***. Redesign the supports provided by the central office for schools to effectively implement educationally-sound instructional strategies for ELs across all content areas and for English Language Development. The EL Office should be well staffed in order to collaborate with other departments from all content areas, with school improvement efforts, specialized programs, and school completion programs to help such programs and initiatives address EL needs.

E. ***Improved communication infrastructure and protocols***. PPSD would be well served by a revamped communications and public engagement system that includes updated digital resources, and well thought-out and seamless integration of information across schools and departments. It should also think about streamlining requests for interpretation and translation services, particularly for the top five languages spoken by EL families in the city. The district might also think about how to bolster its community engagement efforts through parent advisory groups, regularly scheduled information sessions, forums, social media, parent universities, and stronger school-based customer service. The extensive feedback provided by the Providence parent community to the Council team indicated that not only EL parents, but all parents would benefit from a well-designed and enhanced communication strategy.

F. ***Access to all available funding streams to provide adequate funding***. Finally, the instructional and programmatic needs of ELs should be well integrated into the regular school

day and, as such, should be supported with general education funding from the state that is generated by the mere presence of each student. State and federal categorical funds for ELs provides much needed supplemental funds, but those funds should not be considered the main source of support for EL services. Similarly, funds like Title III should not be considered the sole source of support for ELs. Title I, Title II, and School Improvement Grants (SIG) funds can and should be supporting EL programming, both directly and indirectly. However, general state and local aid should be providing core funding for this population.

Appendix A. Cross Reference of Council Recommendations to DOJ Settlement Agreement Requirements

Delivery dates are omitted for brevity

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
Identification of Students		
1	The District will take "appropriate action to overcome language barriers that impede equal participation" by ELs in its instructional programs. 20 U.S.C. § 1703(f).	Entire set of recommendations
2	**Home Language Survey and Screening Assessment.** The District will continue to require all parents to complete a home language survey during the new student registration process. To ensure that ELs are properly identified, the District will administer a valid and reliable grade-appropriate English Language Proficiency assessment in all four language domains to all students in grades K-12 whose home language survey indicates that a language other than English is spoken at home or by the student, or if there is any other reason to believe that the student is not proficient in English, except that the District may assess incoming kindergarteners' English Language Proficiency only in listening and speaking in the fall semester. Consistent with World-Class Design and Assessment ("WIDA") guidelines, students participating in the pre-kindergarten program will be assessed no earlier than six months prior to the start of their kindergarten year.	• Registration: Identification and Placement • EL Data Reporting
3	**Screening and Placement Timeline**. The District will administer the English Language Proficiency assessments and place all K-12 students identified as ELs in an appropriate EL program within the first 20 days of the school year, and if the student enrolls thereafter, within ten days from the date of the student's enrollment.	• Registration: Identification and Placement
4	**Screening and Placement in 2018-19.** By the start of the 2018-19 school year, the District will complete a review of all students in the District to identify every student whose home language survey(s) indicated that the student's English Language Proficiency should have been assessed under the standard set forth in Paragraph 2, but who was not assessed. The District also agrees to administer a grade-appropriate English Language Proficiency assessment of any such students prior to the start of the 2018-19 school year. If the District attempts to schedule the assessment during the summer of 2018 and the parent is unresponsive, the District will administer the assessment within the first 20 days of the 2018-19 School Year. For any student identified as an EL pursuant to this paragraph, the District will offer services by the start of the 2018-19 school year or, if applicable, within 20 days of assessment. The District will provide a list of those students, including the date each student was assessed; the resulting assessment scores (domain and composite); each student's EL status; and the type and amount of services the student will receive to the United States within 60 days of the start of the 2018-19 School Year.	• Registration: Identification and Placement

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
5	**Inventory of students screened and identified in 2018-19**. Review of 2018-19 By the start of the 2018-19 school year, the District will complete a review of all students in the District to identify every student who does not have a completed home language survey and to administer a home language survey to any such students. For any student whose home language survey completed pursuant to this paragraph indicates that the student's English Language Proficiency should have been assessed under the standard set forth in Paragraph 2, but who was not assessed, the District also agrees to administer a grade-appropriate English Language Proficiency assessment prior to the start of the school year. If the District attempts to schedule the assessment during the summer of 2018 and the parent is unresponsive, the District will administer the assessment within the first 20 days of the 2018-19 School Year. For any student identified as an EL pursuant to this paragraph, the District will offer services by the start of the 2018-19 School Year or, if applicable, within 20 days of assessment. The District will provide a list of those students, including the date each student was assessed; the resulting assessment scores (domain and composite); each student's EL status; and the type and amount of services the student will receive to the United States within 60 days of the start of the 2018-19 school year.	• Registration: Identification and Placement • EL Data Reporting
6	**Parent waiver of EL Services.** The District will provide all ELs with the EL services required by this Agreement and will ensure that ELs do not need to change schools in order to receive these services. If any EL seeks and is denied enrollment in a District school due to lack of space or some other reason (e.g., the EL program is not offered at the parent's school of choice), the District shall (i) make a record of each instance, including the desired school(s), the reason(s) the desired school(s) were denied, and the school and EL program in which the EL enrolled; and (ii) ensure that the EL still receives EL services consistent with this Agreement.	• Registration: Identification and Placement • EL Instructional Program Support and Monitoring
7	**Registration and placement.** By the start of the 2018-19 School Year, and annually thereafter, the District will train all registration and intake personnel, including all Enrollment Center staff, on its EL identification and placement policies and procedures, including those outlined in this section and Paragraph 30.	• Registration: Identification and Placement • Staffing and Professional Development
Provision of EL Services & Access to Curriculum		
8	**ELD Periods and Progress Monitoring**. The District will provide all EL students, including ELs with disabilities, at least a daily period [1] of ESL unless the EL student's parents make a voluntary and informed decision in writing to opt out [2] of such services. The District will monitor the academic progress of each opt-out EL to assess his/her ability to participate meaningfully in the regular education program without EL services by having the core content teachers complete a monitoring form each quarter. When an opt-out EL is not progressing as expected, the District will inform the student's parents and recommend ESL and/or other EL services in a language the parents understand, including providing a qualified interpreter and a translated version of the opt-out monitoring form in the Major Languages.	• Program Design and Instructional Delivery • EL Instructional Program Support and Monitoring • Vision and Shared Responsibility for ELs
9	**Student Groupings and Teacher Qualifications for ESL/ELD**. The District agrees that ESL is a core subject for ELs and will provide ESL in addition to other core subjects, except that the District may provide ESL through the core literacy class only for ELs with English Language Proficiency levels of 4 or 5 if the class is (a) taught by an ESL-Certified Teacher	• Program Design and Instructional Delivery

DOJ Settlement Agreement		Relevant Category of Council Recommendations
	who is also certified in English Language Arts or (b) co-taught by an ESL-Certified Teacher and a teacher certified in English Language Arts who have co-planning time together, and the ESL-Certified Teacher provides the ELs explicit ESL. The District may group ELs for ESL by (a) their English Language Proficiency level within a single grade or vertically across grades (limited to two consecutive grades at the elementary level) or (b) two comparable, consecutive English Language Proficiency levels within a single grade.	• Staffing and Professional Development
10	**Minimum Number of ESL Periods**. As soon as possible and no later than the start of the 2020-21 school year, the District will provide an additional period of ESL to newcomers and other ELs with English Language Proficiency levels 1 and 2.	• Program Design and Instructional Delivery • EL Instructional Program Support and Monitoring
11	**ENE confirmation in SY 2018-19**. To ensure that the District offers appropriate EL services to ELs who did not receive EL services when enrolled in prior school years, the District will identify all students designated as "Eligible but not enrolled" ("ENE") between the 2012-13 and 2015-16 school years and report them to the United States by the start of the 2018-19 School Year. The District will require the designee of the EL Director (e.g., a principal, EL specialist, or ESL-certified lead teacher) at the school or the registration center to make a good faith effort to meet with the parents of each identified ENE student to: (a) explain the range of EL programs and services that the child could receive, including the nature of the services and the qualifications of the teachers providing the services and (b) discuss the benefits their child is likely to gain by receiving EL services. If the parents affirm that they do not want their child to receive EL services, the District will ask the parents why they are opting out of EL services, record this information, and follow its procedures for opt-out EL students as set forth in Paragraph 8 above, and report this information to the United States by December 31, 2018 and annually thereafter on July 15.	• Registration: Identification and Placement • EL Instructional Program Support and Monitoring • Family/Community Engagement and Communications
12	**ENE Monitoring**. If more than 10% of ELs at a given school were ENEs in 2015, 2016, or 2017 or are ENEs in 2018 or thereafter, the EL Director will meet with the principal, analyze the reasons for the refusals, and take appropriate steps to reduce this rate.	• Vision and Shared Responsibility for ELs • EL Instructional Program Support and Monitoring
13	**ESL and Content Instruction for ESL Programs**. To ensure meaningful access to the core curriculum, all ELs enrolled in Sheltered ESL, ESL Push-In, ESL Newcomer, or Collaborative ESL will receive core content classes where instruction is primarily in English and classroom teachers (a) have been trained to use effective Sheltered Content Instruction techniques to make lessons accessible to ELs, as set forth in Paragraph 21 of this Agreement or (b) are on track to complete such training per Paragraph 22. To support ELs with the least amount of English, the District will prioritize the assignment of ELs with English Language Proficiency levels 1-2 to Sheltered Content Instruction classes and then assign ELs with higher English Language Proficiency levels as more teachers complete the training set forth in Paragraph 21.	• Program Design and Instructional Delivery • Staffing and Professional Development

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
	By the third year of this Agreement, all ELs, except those enrolled in the District's bilingual programs, will receive at least two periods of Sheltered Content Instruction per day with ELs at levels 3 and higher receiving this instruction in integrated Sheltered Content Instruction classes.	
14	**ESL and Content Instruction for Bilingual/Dual Language Programs.** All ELs enrolled in Transitional Bilingual, Developmental Bilingual, or Dual Language will receive (a) some core content classes in native-language instruction from a teacher who holds a Rhode Island certificate for the level and subject in which he or she teaches and a Rhode Island endorsement as a Bilingual teacher and (b) some core classes in English from such a teacher, an ESL-Certified Teacher, or a teacher who has completed the training set forth in Paragraph 21 or is on track to complete it per Paragraph 22.	• Program Design and Instructional Delivery • Staffing and Professional Development
15	**Scheduling Guidance ESL and Content Instruction**. The District will submit to the United States for its review and approval: guidance on how to schedule ESL and Sheltered Content Instruction classes for ELs at varying English Language Proficiency levels, including ELs who are newcomers, long-term, or have limited or interrupted formal education; and sample class schedules for elementary, middle, and high schools with both low and high EL enrollment.	• Program Design and Instructional Delivery • EL Instructional Program Support and Monitoring
16	**EL Data Monitoring to Ensure Receipt of EL Services**. So that teachers know which students need language assistance, all current and former ELs will have their overall English Language Proficiency level and status (e.g., Active, ENE, opt out, or former EL) noted on all class rosters. The District agrees to monitor class rosters at least once each semester to ensure that all ELs receive the EL instructional services in this Agreement. If the District learns that an EL is not receiving EL services consistent with this Agreement, the District will take reasonable steps to ensure that the EL receives appropriate services within ten days, consistent with this Agreement. The District will not count homeroom, art, music, gym, health, or other similar specials or elective classes as ESL.	• EL Data Reporting • EL Instructional Program Support and Monitoring
Staffing and Professional Development		
17	**Recruitment Plan.** The District will actively recruit ESL-Certified Teachers for relevant teaching positions. Within 90 days of the effective date of this Agreement, the District will provide a plan for recruitment of such staff to the United States for review and approval. The District's notices regarding vacancies will express a preference for candidates with an ESL certification. District employees responsible for the recruitment and hiring of teachers for the EL programs and special education personnel will meet annually to discuss ways to improve the recruitment, hiring, and assignment of applicants who are certified in ESL.	• Staffing
18	**ESL-Certified Teachers.** By the start of the 2019-20 school year, the District will employ a sufficient number of ESL-Certified Teachers to provide the ESL components of its EL programs consistent with this Agreement. Thereafter, the District will make necessary adjustments to the assignments of ESL-Certified Teachers based on changes to the numbers of ELs at its schools	• Staffing • Budget and Finance
19	**Incentive Program to Obtain ESL Certificate.** By the start of 2018-19 school year, the District agrees to implement an incentive program, which will include some level of tuition coverage/reimbursement, for the District's core content teachers to obtain a RIDE ESL endorsement or certificate. The District will submit a proposal for the incentive program to the United States for review within 60 days of the Agreement's effective date. The District will advertise the	• Staffing and Professional Development • Budget and Finance

DOJ Settlement Agreement		Relevant Category of Council Recommendations
	incentives it offers to its teachers and will provide to the United States evidence that it has disseminated this information to all current teachers.	
20	**All EL-related Classes Taught by EL-qualified Teachers**. By the start of the 2019-20 School Year, the District will ensure that the ESL components of its EL programs are taught by ESL-Certified Teachers, and that core content teachers of ELs in its Sheltered ESL, ESL Push-In, ESL Newcomer, and Collaborative ESL programs are adequately trained to provide the Sheltered Content Instruction required by Paragraph 13. All ESL instruction will be provided by an ESL-Certified teacher or one who is "on track" to complete the state ESL certification. "On track" to complete the ESL certification means that any newly hired ESL teachers who lack the ESL certification will be actively working to obtain it within two years of their hire date and any current ESL teachers who lack it will obtain it by the end of the 2018-19 school year. All Sheltered Content Instruction will be provided by one of the following: (1) a teacher dually endorsed in ESL and the content area; (2) an ESL Certified Teacher co-teaching with a content-certified teacher; or (3) a content-certified teacher who has completed the training outlined in Paragraph 21 or is "on track" to complete that training within three years as set forth in Paragraph 22.	• Staffing and Professional Development • EL Instructional Program Support and Monitoring
21	**Professional Development Plan.** Within 90 days of the effective date of this Agreement, the District will develop and provide to the United States for review and approval a professional development plan that, over the course of this Agreement, will provide core content teachers of Sheltered Content Instruction in Sheltered ESL, ESL Push-In, ESL Newcomer, and Collaborative ESL programs with adequate training on effective strategies for teaching ELs and promoting their English language development in all four language domains. The professional development plan will provide each teacher, annually, with at least ten hours of professional development on effective EL teaching strategies and at least five hours of in-classroom support on using those strategies (e.g., coaching from the trainer or an EL Specialist). This professional development will give teachers practical instructional strategies appropriate for planning, delivering, and adapting content for ELs within the context of standards-based lesson planning, instruction, and assessment and sufficient opportunities for modeling, practicing, and receiving feedback regarding such strategies.	• Professional Development
22	**Qualifications of Content Teachers.** By the start of the 2019-20 school year, the District will require enough core content teachers of ELs to have completed or be on track to complete the training outlined in Paragraph 21 to be able to comply with Paragraphs 13 and 14. Being "on track" to complete the training within three years means that teachers new to the District receive ten hours of professional development on teaching strategies and five hours of in-classroom support on using those strategies per year.	• Staffing and professional development
23	**New Teacher Position Requirement.** To secure enough teachers who can provide the Sheltered Content Instruction and ESL required by this Agreement, the District will require that all newly posted teacher positions in the District require an ESL certification or that the teacher applicant become ESL-certified or complete the training required by Paragraph 21.	• Staffing

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
24	**Professional Development for Co-Teaching and Special Education**. ESL Teachers and teachers who are assigned to co-teach will (a) receive training on how to co-teach classes to ELs by the end of the 2018-19 school year and b) have weekly scheduled common planning time with their co-teacher by the start of the 2019-20 school year. Similarly, in the collaborative ESL program, ESL Certified teachers and the general education and/or special education teachers who instruct ELs in this program will meet for at least a period each week for scheduled common planning and such teachers will receive adequate training on how to collaborate in the delivery of content instruction to ELs by the start of the 2018-19 school year.	• Professional Development • Special Education
25	**Walkthrough Tool.** The District will develop a classroom walkthrough teacher feedback tool for use by administrators and instructional coaches in all schools to evaluate the implementation of ESL and Sheltered Content Instruction in core content classes. The District will provide its proposed classroom walkthrough teacher feedback tool to the United States within 90 days of the start of the 2018-19 School Year; the United States will provide its feedback to the District within 60 days of receipt.	• Program Design and Instructional Delivery • EL Instructional Program Support and Monitoring
26	**Principal and Administrator Training.** The District will provide principals, and any other administrators who evaluate teachers of ELs, with annual training regarding their responsibilities under this Agreement, in addition to training on how to identify ESL and sheltering teaching strategies in classroom instruction and how to use the classroom walkthrough tool described in Paragraph 25 to provide constructive feedback to teachers during and/or after classroom walkthroughs. In the principal training, the District will explain that collaboration with core content, special education, or any other teachers may not replace ESL instruction by an ESL-Certified Teacher. The District will provide its proposed administrator training for the United States' review and comment within 90 days of the start of the 2018-19 school year and annually thereafter by October 1; the United States will provide its feedback to the District within 60 days.	• Professional Development • EL Instructional Program Support and Monitoring • Vision and Shared Responsibility for ELs
27	**EL Director.** Within 90 days of the Agreement's effective date, the District will fill its EL Director position and provide this Director with the training necessary to oversee the implementation of this Agreement, including annual refresher training on its requirements.	• NA
Curriculum and Resource Allocation		
28	**Resources.** The District will provide adequate resources, instructional materials,[3] and dedicated classroom/office space at all schools to implement its EL programs. This will include providing ELs with access to ESL and core content materials appropriate to their age and English Language Proficiency levels. Within 60 days of this Agreement, the District will complete an inventory of its existing materials and a review of its policies for selecting textbooks and other instructional materials. The District also will consider EL needs during its annual textbook review process and all curriculum working groups.	• Vision and Shared Responsibility for ELs • Budget and Finance
29	**ESL Curriculum**. The District agrees that ESL is a core class for ELs that warrants a curriculum similar to that of other core courses. To that end, the District will develop or adopt a K-12 ESL curriculum over the course of this Agreement. By December 2019, the District will develop and implement an elementary (grade K-5) ESL curriculum, and by the end	• Program Design and Instructional Delivery • Professional Development

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
	of SY 2019-20, [the District will develop and implement] a secondary (6-12) ESL curriculum. The District will incorporate training on the new curricula and materials into teacher professional development days.	
Communication		
30	**Interpretation and Translation**. To identify limited English proficient parents who need language assistance, the District will ask parents to indicate on the home language survey whether they need school- and district-level communications in a language other than English through interpreters and/or translations. The District will make this information readily accessible to administrators and teachers through the student information system. By the 2018-19 school year, the District will train its employees to review this information before scheduling meetings with parents and sending out notices to parents. During this training, the District will explain how to obtain qualified interpreters and translations of essential information into the District's Major Languages. The District also will add a statement to its registration packet, its online registration form, and the homepage of the District and school websites about the availability of interpretation in multiple languages and how to request an interpreter or a translation.	• Family/Community Engagement and Communications • Professional Development
31	**Translated District Documents**. The District agrees to give limited English proficient parents access to school-related information provided to other parents as follows: A. Notices or documents containing essential information that are distributed at the District or school level will be translated into the District's Major Languages and distributed to parents speaking those languages; and speakers of languages other than the Major Languages will be provided, in a timely manner, written translations or interpretation of the documents in a language they understand either upon request or if the need for such translation becomes apparent to the District B. Oral communications of essential information will be provided in a language the parent understands by means of an interpreter without undue delay. The District will provide oral interpretation or written translation of other school-related information upon receiving reasonable, specific requests for such information from limited English proficient parents.	• Family/Community Engagement and Communications • Registration and Placement • EL Access to Curriculum
32	**Interpretation Services by Qualified Interpreters.** All District or school-provided interpreters, whether paid District employees, contractors, or volunteers, will be: bilingual and demonstrably qualified and competent to interpret; trained in providing the interpretation they are asked to provide or sufficiently knowledgeable in both languages of any specialized terminology needed to provide the requested interpretation accurately; and trained in the ethics of interpretation (e.g., the need for accuracy and confidentiality in interpretation). Except in an emergency, the District will not use students, family or friends of limited English proficient parents, or Google Translate for interpretation of District- or school-generated documents or for any other translation or interpreter services. If there is an emergency and no District interpreter is available, the District will follow up with the parent in a timely manner to communicate, through a qualified interpreter or translation, the information that the family or friends orally interpreted. If instructional staff are asked to provide translation or interpreter services, the District will ensure that such duties do not interfere with the staff member's instructional and monitoring duties with respect to ELs and former ELs.	• Staffing • Family/Community Engagement and Communications • EL Access to Curriculum

DOJ Settlement Agreement		Relevant Category of Council Recommendations
33	**EL Program Information.** The District will develop written materials for parents that provide clear, accurate, and up-to-date information about each of its EL programs, including, but not limited to: (a) the amount of weekly ESL provided, depending on the EL's English Language Proficiency level; (b) the amount of weekly Sheltered Content Instruction provided; (c) the certification and training required for teachers who provide ESL and core content instruction; (d) the number of classes each day enrolling only ELs; and (e) whether classes in the EL program count as core credits or electives toward graduation requirements. The District will translate these materials into the Major Languages and will provide them to all parents prior to an initial EL program placement and prior to any change in EL program placement and offer a qualified interpreter to explain items (a)-(e) above to limited English proficient parents of other languages.	• Registration: Identification and Placement • Vision and Shared Responsibility for ELs • Communications and Community Engagement • EL Access to Curriculum
34	**Digital Warehouse of Translated Documents and Resources.** To ensure that all schools have access to already translated information, the District will provide central office and school-based employees with electronic access to an accurate and current inventory of translated District-level and school-specific documents, as well as instructions for requesting translations of additional documents. The District will continue to expand the inventory to include translations of all district-level and school-level essential information in the Major Languages. To assist all schools in communicating with limited English proficient parents, the District will provide principals with a list of the names, languages, and contact information for all District employees, contractors, and others who provide translation and interpretation services. The policies and procedures regarding access to translation and interpretation services will be included in the District's annual training for administrators and teachers.	• Communications and Community Engagement • EL Access to Curriculum
EL Access to Special Services		
35	**ELs with Disabilities Must Receive Both ESL and Special Education Services.** All provisions of this Agreement apply equally to ELs with disabilities. No EL with a disability will be denied ESL solely due to the nature or severity of the student's disability; nor will that student be denied special education services due to his/her EL status.[4] The District will notify parents of ELs with disabilities in writing in a language they understand that their child is entitled to both English as a Second Language and special education services.	• ELs in Special Education • Budget and Finance
36	**Professional Development on Serving ELs with Disabilities.** The District will employ reasonable measures to train its special education and ESL-Certified Teachers who work with disabled EL students on how to provide services to ELs with disabilities, particularly disabilities affecting language acquisition and written and oral language processing and expression. This training will include at least one annual joint planning meeting with special education and ESL-Certified Teachers at each school to discuss ESL and procedures for timely identifying and serving ELs with disabilities. Each school also will maintain a list of staff members who have knowledge and experience regarding EL needs, services, and language and cultural backgrounds, and the intersection of EL and special education services. To the extent practicable, the District will ensure that at least one person from this list is present at all special education meetings for ELs.	• Staffing and Professional Development • Budget and Finance • ELs in Special Education
37	**Access to Specialized Programs.** The District will provide an equal opportunity for ELs to apply for and participate in the District's specialized programs, including but not limited to the Advanced Academic programs at Nathanael	• EL Access to Curriculum

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
	Greene, Roger Williams, Classical High School, and the Providence Career & Technical Academy by: (1) ensuring that a student's EL status and the duration of time the student receives EL services is not a barrier to participation; (2) reviewing admissions criteria and scheduling decisions to ensure ELs are not denied admissions because of their limited English proficiency; (3) requiring enough teachers to complete the Sheltered Content Instruction training discussed in Paragraph 21 to provide ELs in these specialized programs with at least two periods of Sheltered Content Instruction per Paragraph 13; (4) staffing each school with enough ESL-Certified Teacher(s) to provide ELs in these programs with a daily period of ESL; (5) notifying all teachers and guidance counselors about how to recommend ELs among other students for participation; (6) translating admissions and recruitment materials into the Major Languages and offering oral interpretations of these materials to LEP parents who speak other languages; and (7) translating essential information on the schools' websites into the Major Languages.	
Program Monitoring and Evaluation		
38	**Data Requirements to Monitor Services for ELs and Their Progress.** The District will monitor the EL services and English Language Proficiency progress of current ELs and the academic performance of current and former ELs through its electronic student information system(s). To facilitate its monitoring of current and former ELs, the District will maintain the following information electronically and in hard copy in each student's permanent educational record: the home language survey; the EL's initial and annual English Language Proficiency assessment scores in all domains, and the name of each EL program (e.g., Sheltered ESL, ESL Push-In, Transitional Bilingual) in which the student is enrolled (e.g., if the EL program changed over time). To permit evaluations of its EL programs over time, the District will maintain in its student database the following data in separate fields: all English Language Proficiency assessment scores, including the initial screener and annual assessment scores; standardized test scores; retention, drop out, and graduation data; whether the student is a long-term EL, an opt-out EL, a former EL, or a newcomer EL or has limited or interrupted formal education; and the year that the student was designated as an EL.	• EL Instructional Program Support and Monitoring • Vision and Shared Responsibility for ELs • EL Data Reporting
39	**Quarterly Review of Data**. The EL Director will review tracking data for each EL in all of the District's schools (including the English Language Proficiency levels in all four language domains), services (e.g., ESL, Sheltered Content Instruction, bilingual education), the amount of services, and whether the EL has a disability (or has been referred for a special education evaluation, if applicable) on a quarterly basis to ensure that all students identified as eligible for EL services are receiving appropriate services, unless the ELs have opted out of or exited the District's EL Programs.	• EL Instructional Program Support and Monitoring • Vision and Shared Responsibility for ELs • EL Data Reporting
40	**Exiting and Progress Monitoring of Former ELs.** The District will use valid and reliable criteria for exiting ELs from EL programs and EL status, including a grade-appropriate valid and reliable assessment of the student's English language proficiency level in each of the four language domains. The District will monitor the academic performance of former EL students twice a year, for two years, by reviewing their standardized test scores, composite and domain scores on the English Language Proficiency test at the time of exit, and progress reports for grades, attendance, preparation, and behavior to determine if the student needs any academic support services (e.g., tutoring) or needs to be retested for possible reentry into the EL Program. If a former EL student fails to make academic progress and if an ESL-Certified Teacher, an administrator, and core-content teachers determine that this failure may be due to a lack of English	• EL Instructional Program Support and Monitoring • Vision and Shared Responsibility for ELs • EL Data Reporting

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
	proficiency, the District will notify the student's parents and offer EL services and provide the student with the services that the parents accepts. Each District school will send its monitoring reports to the District's EL Department.	
41	**School Audits.** The District will monitor all schools for compliance with this Agreement. To that end, the District will develop school-level audit procedures to evaluate the quality and effectiveness of the EL programs, based on students' services, students' English Language Proficiency and academic performance, teacher evaluations, and staffing and resources allocations. At each school, an administrator will monitor caseloads of ELs to ensure each student receives the appropriate amount and type of services and progresses academically.	• EL Instructional Program Support and Monitoring • Vision and Shared Responsibility for ELs • EL Data Reporting
42	**Longitudinal Analysis of EL Program Effectiveness.** The District will evaluate the effectiveness of each of its EL programs district-wide to determine whether they are overcoming language barriers within a reasonable period of time and enabling students to participate meaningfully and equally in its educational programs. To that end, the District agrees to conduct a three-year longitudinal cohort analysis of each of its programs at the elementary, middle, and high school levels by disaggregating and monitoring the following data by current, former, and never ELs, for each EL program utilized by the District: standardized test scores, exit rates, dropout rates, graduation rates, retention-in-grade rates, English Language Proficiency assessments, and enrollment in special education and enrichment programs (e.g., gifted, honors, and Advanced Placement classes). In conducting the analysis, the District will track a cohort of ELs who were enrolled in kindergarten, third grade, sixth grade, and ninth grade in SY 2016-17 and who remain enrolled in the District over the term of this Agreement. The District will use the results of its longitudinal analysis to inform EL program decisions and ensure every EL program it uses is effective. [See also paragraph 43(4).]	• EL Instructional Program Support and Monitoring • EL Data Reporting
Reporting		
43 44	The Agreements requires the district to meet detailed reports on a series of indicators and to inform DOJ of all substantive changes to the EL Program. ... The District will provide to the United States annual reports in electronic format detailing its efforts to comply with this Agreement. An initial report containing the information in sections A and B below for the 2017-18 school year will be provided on August 3, 21. A repot containing the information in Section A and B for the current school year will be provided on October 1, 2018. A report containing the information for all sections, including but not limited to Sections A and B, will be provided annually thereafter on July 15 for the school year that just ended. If any of the information required for the annual reports in a particular school year is available in a document that the District already has prepared to comply with federal or state laws or regulations, the District may include the document in its reports and indicate the section of the report to which the document applies. [See reporting provisions] A-G are as follows: A. Identification and Placement of Students B. Provision of EL Services and Access to the Core Curriculum C. Staffing and Professional Development D. Curriculum and Resource Allocation E. Communications	• EL Data Reporting

	DOJ Settlement Agreement	Relevant Category of Council Recommendations
	F. Access to Special Services G. Monitoring and Program Evaluation	
Enforcement		
45	These five remedies stipulate that the school districts, by the Agreement, will maintain necessary records related to compliance and to report to DOJ, as required by the agreement. The remedies also include specifics about the date until which the Agreement is effective, the entities for whom the Agreement is binding, and the stipulation that the US (DOJ) can initiative judicial proceedings in the event of a breach by the District of the Agreement.	There are no Council recommendations that are expressly relevant to DOJ *Enforcement* remedies 45 through 49.
46		
47		
48		
49		

Appendix B. School Names by Zone and Type

Zone	Type	Full Name	Abridged Name
Elementary - 1	Elementary	Anthony Carnevale Elementary School	Carnevale
Elementary - 1	Elementary	William D'Abate Elementary School	D'Abate
Elementary - 1	Elementary	Alan Shawn Feinstein Elementary at Broad Street	Feinstein at Broad
Elementary - 1	Elementary	Lillian Feinstein Elementary, Sackett Street	Feinstein at Sackett
Elementary - 1	Elementary	Charles N. Fortes Elementary School	Fortes
Elementary - 1	Elementary	Vartan Gregorian Elementary School	Gregorian
Elementary - 1	Elementary	Robert F. Kennedy Elementary School	Kennedy
Elementary - 1	Elementary	Alfred Lima, Sr. Elementary School	Lima
Elementary - 1	Elementary	Pleasant View School	Pleasant View
Elementary - 1	Elementary	Frank D. Spaziano Elementary School	Spaziano
Elementary - 1	Elementary	Frank D. Spaziano Elementary School Annex	Spaziano
Elementary - 1	Elementary	Veazie Street School	Veazie
Elementary - 2	Elementary	Robert L Bailey IV, Elementary School	Bailey
Elementary - 2	Elementary	Mary E. Fogarty Elementary School	Fogarty
Elementary - 2	Elementary	Dr. Martin Luther King, Jr. Elementary School	King
Elementary - 2	Elementary	Harry Kizirian Elementary School	Kizirian
Elementary - 2	Elementary	Carl G. Lauro Elementary School	Lauro
Elementary - 2	Elementary	Leviton Dual Language School	Leviton
Elementary - 2	Elementary	Asa Messer Elementary School	Messer
Elementary - 2	Elementary	Reservoir Avenue School	Reservoir
Elementary - 2	Elementary	Webster Avenue School	Webster
Elementary - 2	Elementary	George J. West Elementary School	West
Elementary - 2	Elementary	The Sgt. Cornel Young, Jr & Charlotte Woods Elementary	Young & Woods
Middle	Middle	Nathan Bishop Middle School	Bishop
Middle	Middle	Governor Christopher DelSesto Middle School	DelSesto
Middle	Middle	Nathanael Greene Middle School	Greene
Middle	Middle	Esek Hopkins Middle School	Hopkins
Middle	Middle	Gilbert Stuart Middle School	Stuart
Middle	Middle	West Broadway Middle School	West Broadway
Middle	Middle	Roger Williams Middle School	Williams
High	High	360 High School	360
High	Charter High	Academy for Career Exploration (ACE)	ACE
High	High	Dr. Jorge Alvarez High School	Alvarez
High	High	Providence Career and Technical Academy	Career & Tech
High	High	Central High School	Central
High	High	Classical High School	Classical
High	High	E-Cubed Academy	E3 (E-Cubed)
High	High	Evolutions High School	Evolutions
High	High	Hope High School	Hope

Zone	Type	Full Name	Abridged Name
High	High	Mount Pleasant High School	Mount Pleasant
High	High	William B. Cooley, Sr. High School and The Providence Academy of International Studies (High School) at The Juanita Sanchez Complex	Sanchez
High	Charter K-12	Times2 Academy	Times2

Appendix C. Subgroups as Percentage of School Enrollment by Zone in SY 2018-19

School	Native American	Asian	Black	Hispanic	Multi-Racial	White	FRL	EL	IEP	Total
Elementary – 1										
Carnevale	0.5%	4.7%	12.7%	63.8%	4.5%	13.6%	84.0%	21.1%	31.5%	550
D'Abate	1.8%	2.5%	9.0%	77.0%	3.8%	6.0%	88.8%	41.5%	12.8%	400
Feinstein at Broad	0.9%	4.3%	14.1%	69.1%	3.8%	7.9%	87.0%	50.3%	7.2%	469
Feinstein at Sackett	1.4%	5.7%	15.9%	67.0%	3.2%	6.8%	90.2%	38.7%	13.7%	439
Fortes	0.8%	4.6%	14.9%	71.1%	4.3%	4.3%	84.9%	25.4%	23.5%	370
Gregorian	0.6%	6.0%	14.8%	26.8%	10.3%	41.6%	55.3%	11.1%	21.4%	351
Kennedy	0.4%	3.4%	19.4%	50.7%	8.8%	17.3%	75.8%	22.1%	12.6%	475
Lima	1.4%	6.0%	15.8%	66.9%	5.4%	4.4%	91.0%	32.3%	15.2%	499
Pleasant View	2.1%	4.0%	13.1%	62.7%	6.5%	11.7%	80.7%	14.5%	33.3%	429
Spaziano	1.8%	0.5%	8.3%	80.7%	1.8%	7.0%	91.7%	51.8%	12.6%	398
Spaziano Annex	0.0%	0.0%	11.6%	76.9%	2.9%	8.7%	88.4%	27.2%	9.8%	173
Veazie	0.9%	3.2%	25.5%	50.7%	7.8%	11.9%	87.9%	15.3%	13.4%	529
Elementary – 2										
Bailey	0.8%	4.1%	26.7%	57.0%	6.7%	4.7%	91.2%	21.5%	23.8%	386
Fogarty	1.3%	5.3%	20.0%	62.9%	5.1%	5.5%	92.1%	46.2%	13.6%	455
King	1.8%	3.0%	34.5%	41.3%	8.4%	11.0%	80.8%	15.2%	14.6%	501
Kizirian	1.4%	6.1%	19.7%	58.5%	5.9%	8.4%	87.8%	35.7%	7.3%	574
Lauro	1.2%	2.8%	14.5%	70.3%	4.6%	6.6%	87.2%	39.1%	10.9%	822
Leviton	0.0%	0.4%	1.1%	91.9%	1.5%	5.2%	89.3%	51.7%	9.6%	271
Messer	0.7%	8.8%	8.8%	70.1%	3.5%	8.1%	88.6%	47.2%	14.7%	545
Reservoir	0.4%	8.1%	9.5%	71.9%	3.5%	6.7%	84.6%	44.2%	7.0%	285
Webster	1.0%	7.8%	6.2%	73.3%	2.3%	9.4%	87.3%	48.2%	18.9%	307
West	1.1%	2.6%	15.5%	68.1%	4.8%	7.9%	84.0%	29.0%	8.2%	730
Young & Woods	1.3%	5.7%	17.8%	65.9%	3.8%	5.7%	89.2%	47.0%	11.9%	636
Middle										
Bishop	1.3%	2.5%	16.8%	54.6%	5.8%	19.0%	73.9%	21.8%	18.4%	689
DelSesto	1.0%	3.4%	10.6%	77.4%	2.7%	4.9%	91.2%	28.6%	16.9%	902
Greene	0.6%	4.3%	17.1%	66.2%	4.5%	7.3%	86.6%	19.0%	11.8%	976
Hopkins	1.3%	2.2%	21.0%	63.6%	4.5%	7.4%	91.7%	19.7%	16.1%	552
Stuart	1.0%	6.1%	14.6%	69.7%	3.6%	5.1%	87.5%	31.2%	10.9%	907
West Broadway	0.9%	9.0%	9.2%	70.7%	3.8%	6.4%	93.8%	27.4%	16.2%	468
Williams	0.9%	3.7%	20.3%	67.2%	2.7%	5.3%	90.6%	30.5%	13.2%	789
High										
360	1.3%	0.9%	15.8%	68.8%	6.8%	6.4%	86.8%	35.0%	11.1%	234
ACE	0.5%	1.0%	17.2%	76.6%	1.0%	3.8%	82.8%	11.5%	15.3%	209

School	Native American	Asian	Black	Hispanic	Multi-Racial	White	FRL	EL	IEP	Total
Alvarez	0.5%	4.1%	13.1%	76.0%	2.3%	4.0%	83.8%	56.4%	11.5%	755
Career & Tech	0.8%	6.5%	12.5%	73.4%	3.0%	3.8%	85.5%	13.1%	15.9%	662
Central	0.6%	5.4%	14.9%	73.2%	2.6%	3.3%	88.2%	38.7%	13.7%	1,203
Classical	0.2%	9.8%	15.2%	45.7%	4.1%	24.9%	59.8%	0.6%	0.6%	1,087
E3 (E-Cubed)	0.5%	4.1%	24.6%	59.7%	3.5%	7.6%	86.5%	24.6%	13.8%	370
Evolutions	2.5%	3.3%	15.6%	65.6%	5.3%	7.8%	80.7%	27.9%	11.9%	244
Hope	1.0%	3.5%	18.1%	67.0%	4.3%	6.1%	86.2%	28.5%	25.6%	999
Mount Pleasant	1.5%	3.5%	16.1%	69.5%	2.9%	6.5%	87.4%	40.9%	23.2%	921
Sanchez	0.5%	2.9%	13.9%	75.7%	2.9%	4.1%	88.2%	35.1%	16.8%	416
Times2	0.4%	2.1%	27.7%	61.2%	2.6%	6.0%	80.3%	8.2%	8.9%	722

Source: Council analysis of Rhode Island Department of Education October enrollment data. Rhode Island Department of Elementary and Secondary Education. (2019). RIDE report card. Retrieved June 10, 2019, from https://reportcard.ride.ri.gov/Researcher.

Appendix D. Languages Spoken by ELs in SY 2018-19

Using home language survey data from the student-level data file for ELs in SY 2018-19, the Council identified languages spoken by ELs in rank order.[105] Because of duplicate languages (e.g., Cambodian, Khmer, Khmer/Cambodian) or lack of grouping for similar languages (e.g., Cape Verdean, Creole – Cape Verdean/Portuguese, Portuguese), we recoded some languages based on the U.S. Census' primary language code list.[106]

Language	Number of Speakers	Number of Speakers as Percentage of Total ELs
Spanish	6,682	81.240%
English	822	9.994%
Quiche	90	1.094%
Swahili	84	1.021%
Indigenous Latin American Languages	81	0.985%
Arabic	75	0.912%
Portuguese and Portuguese Creoles	72	0.875%
Other African Languages	68	0.827%
Mon-Khmer Languages	43	0.523%
Haitian and Haitian Creole	41	0.498%
Amerindian Languages	15	0.182%
Chinese	14	0.170%
Mayan Languages	14	0.170%
French	13	0.158%
Hmong	12	0.146%
Tagalog	9	0.109%
Lao	8	0.097%
Other Indic Languages	8	0.097%
Creole Languages	7	0.085%
Wolof	6	0.073%
Burmese	5	0.061%
Nepali	5	0.061%
Other - Unspecified	4	0.049%
Vietnamese	4	0.049%
Iranian	3	0.036%
Kinyarwanda	3	0.036%
Kru, Igbo, Yoruba	3	0.036%

[105] Languages are from the from the first question on the home language survey pertaining to the language used primarily by parents to communicate with students. The three ELs for which no language was recorded for this question were excluded from this analysis.

[106] U.S. Census Bureau. (n.d.). Appendix A: Primary language code list. Retrieved July 29, 2019, from https://www.census.gov/hhes/socdemo/language/about/02_Primary_list.pdf

Russian	3	0.036%
Samoan	3	0.036%
Sign Language	3	0.036%
Uzbek	3	0.036%
Bengali	2	0.024%
Hindi	2	0.024%
Italian	2	0.024%
Japanese	2	0.024%
Kirundi	2	0.024%
Kuanyama	2	0.024%
Nilo-Saharan (Other)	2	0.024%
Urdu	2	0.024%
Korean	1	0.012%
Quechua	1	0.012%
Somali	1	0.012%
Southern Sami	1	0.012%
Thai	1	0.012%
Twi	1	0.012%
Grand Total	**8,225**	**100.000%**

Source: Council analysis of student-level data file.

Appendix E. Sample Student Grouping and Teacher Qualifications by Model

Program model	Setting (grouping)	Students by ELP Level & Yrs. in School	Teachers Qualification	Courses
ESL (English)				
	Sheltered (self-contained, all ELs)	Level 1-2 Up to 2 years after enrollment	ESOL Certification [currently not with Bilingual, or Dual Language certification]	Core math Sheltered • ELA/ELD • Science • Social studies Integrated for non-core
	Collaborative (integrated)	Levels 1-2, after 2 years in school ***with*** Levels 3 and above Former ELs Never ELs	Elementary Teacher 1 teacher w/ EL cert. **or** 2 teacher Team 1 EL auth. (ESL) 1 10-hour training	ELA/ELD Core (integrated) • Science • Math • Social studies
Dual Language (One-Way and Two-Way DL) Parent would select the preferred program				
	One-Way Dual Language (collapses transitional and development)	EL whose home language is Spanish (80-20) Majority of students would be ELs (less than 50 percent English proficient speakers)	Dual language or Bilingual Certification. Or ESL certification for English Foreign language certification for Spanish	SLA/SLD ELA/ELD Core subject in one language or the other (Escamilla model)
	Two-way Dual Language Start with 50 percent in Spanish in K, maintained through Grade 5	EL whose home language is Spanish English proficient students including former ELs. Ever ELs, and heritage learners, et al. (50-50)	Dual language or Bilingual Certification. Or ESL certification for English Foreign language certification for Spanish	SLA/SLD ELA/ELD Core subject in one language or the other (Escamilla model)

Appendix F. San Diego High School Graduation and College & Career Pathways for EL Students

High School Graduation and College & Career Pathways for EL Students: Traditional 1-6 Schedule

Considerations in determining placement for ELs:

1) CELDT Overall Proficiency Level (OPL)
2) Years of Enrollment in U.S. Schools
3) Current ESL Academic Grade (NOTE: Student should NOT repeat a course in which s/he earned a "C" or higher)
4) Teacher Judgment

EL Placement Guidelines: Initial Ninth Grade Enrollment

*Years of enrollment as of April 1

Beginning OPL		
***Years of Enrollment**	**Course Placement**	**Course #**
0 - 0.6	ESL 1,2 Block	1621, 1622
0.7 – 2.5	ESL 3,4 Block	1623, 1624
2.6 – 3.9	ESL 5,6 Block	1625, 1626
4.0 >	Eng 1,2 Block	1552L, 1553L

Early Intermediate OPL		
***Years of Enrollment**	**Course Placement**	**Course #**
0- 1.7	ESL 3,4 Block	1623, 1624
1.8 – 3.4	ESL 5,6 Block	1625, 1626
3.5 >	Eng 1,2 Block	1552L, 1553L

Intermediate OPL		
***Years of Enrollment**	**Course Placement**	**Course #**
0-1.7	ESL 5,6 Block	1625, 1626
1.8 >	Eng 1,2 Block	1552L, 1553L

EL Placement Guidelines: Initial Tenth Thru Twelfth Grade Enrollment

*Years of enrollment as of April 1

Beginning OPL		
***Years of Enrollment**	**Course Placement**	**Course #**
0 –0.6	ESL 1,2 Block	1631, 1632
0.7 -2.5	ESL 3,4 Block	1633, 1634
2.6 -3.9	ESL 5,6 Block	1635, 1636
4.0 >	Eng 3,4 Block Am Lit 1,2 Block American Lit 1,2 World Lit 1,2 Cont Voices 1,2	1554L, 1555L 1615L, 1616L 1583L, 1584L 1705L, 1706L 1612L, 1613L

Early Intermediate OPL		
***Years of Enrollment**	**Course Placement**	**Course #**
0 -1.7	ESL 3,4 Block	1633, 1634
1.8 -3.4	ESL 5,6 Block	1635, 1636
3.5 >	Eng 3,4 Block Am Lit 1,2 Block American Lit 1,2 World Lit 1,2 Cont Voices 1,2	1554L, 1555L 1615L, 1616L 1583L, 1584L 1705L, 1706L 1612L, 1613L

Intermediate OPL		
***Years of Enrollment**	**Course Placement**	**Course #**
0 -1.7	ESL 5,6 Block	1635, 1636
1.8 >	Eng 3,4 Block Am Lit 1,2 Block American Lit 1,2 World Lit 1,2 Cont Voices 1,2	1554L, 1555L 1615L, 1616L 1583L, 1584L 1705L, 1706L 1612L, 1613L

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High School Graduation and College & Career Pathways for EL Students: Traditional 1-6 Schedule

ESL 1-2 Students Entering Grade 9, 10, or 11

H.S. and UC/CSU Req	Grade 9	Grade 10	Grade 11	Grade 12	Grade 13 (5th year)
9th Traditional Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement)	NAC/ESL 1,2 NAC/ESL 1,2 ESL Math Elective ESL Social Studies Elective Visual & Performing Arts PE	ESL 3,4 ESL 3,4 Lit World History Math World Language PE	ESL 5,6 ESL 5,6 Lit U.S. History Math Science World Language	English 1,2 or 3,4 *ELD Support Class Govn/Econ Math Science Elective	American Lit 1,2 World Lit or Cont Voices 1,2 Elective Math (recommended) Science Elective
9th Accelerated Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement).	ESL 1,2 ESL 1,2 Lit Math Visual & Performing Arts PE World Language	ESL 3,4 ESL 3,4 Lit World History Math Science World Language	ESL 5,6 English 1,2 or 3,4 U.S. History Math Science PE	American Lit 1,2 Wrld Lit or Cont Voices 1,2 *ELD Support Class Govn/Econ Math (recommended) Science	
10th Traditional Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement).		ESL 1,2 ESL 1,2 Lit World Language Math Visual & Performing Arts PE	ESL 3,4 ESL 3,4 Lit World History Math Science World Language	ESL 5,6 ESL 5,6 Lit U.S. History Math Science PE	American Lit 1,2 English 3,4 Govn/Econ Math (recommended) Science NOTE: Will need an additional year to fulfill the English "B" requirement.
10th Accelerated Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement).		ESL 1,2 ESL 1,2 Lit World History Math PE World Language	ESL 3,4 ESL 3,4 Lit US History Math Science World Language	ESL 5,6 Eng 1,2 or 3,4 Govn/Econ Math Science PE	American Lit 1,2 Wrld Lit or Cont Voices 1,2 Math (recommended) Science Visual & Performing Arts Elective
11th Traditional Path **May** meet high school graduation requirements. *Depends on previous credits earned!	EL students entering the district at an older age (17 and up) with minimal credits are considered late entrants. For these students, the counselor must carefully evaluate the likelihood that the student will be able to meet graduation requirements in a timely manner. For instance, a student entering the district at age 17 who would not graduate until age 20 or 21 may be better served at a community college. For some, it may be more appropriate for students to attend a district school for a year before moving on to community college; or it may be most appropriate for them to enroll immediately in community college. It will vary from individual to individual.		ESL 1,2 ESL 1,2 Lit Elective or World History Math Visual & Performing Arts PE	ESL 3,4 ESL 3,4 Lit U.S. History Math Science PE	

*ELD Support Class designed to aid English language development. May include: ELD Literacy Advancement Academy, Academic Language Development (ALD), ELD CAHSEE Support, etc.

High School Graduation and College & Career Pathways for EL Students: Traditional 1-6 Schedule

ESL 3-4 Students Entering Grade 9, 10, or 11

H.S. and UC/CSU Req	Grade 9	Grade 10	Grade 11	Grade 12	Grade 13 (5th year)
9th Traditional Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement)	ESL 3,4 ESL 3,4 Lit World Language Math Visual & Performing Arts PE	ESL 5,6 ESL 5,6 Lit World History Math Science World Language	English 1,2 or 3,4 ELD Support Class U.S. History Math Science PE	American Lit 1,2 *ELD Support Class Govn/Econ Math (recommended) Science Elective	Wrld Lit or Cont Voices 1,2 (Some ELs may need a 5th year to earn credits and be able to graduate, depending upon the transferable credits from their native country)
9th Accelerated Path **May** meet high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement). *Depends upon previous credits earned!	ESL 3,4 ESL 3,4 Lit World Language Math Visual & Performing Arts PE	ESL 5,6 English 1,2 or 3,4 World History Math Science World Language	American Lit 1,2 *ELD Support Class US History Math Science PE	Wrld Lit or Cont Voices 1,2 *ELD Support Class Govn/Econ Math (recommended) Science Elective	
10th Traditional Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement).		ESL 3,4 ESL 3,4 Lit World History Math World Language PE	ESL 5,6 ESL 5,6 Lit US History Math Science World Language	English 1,2 or 3,4 *ELD Support Class Govn/Econ Math Science PE	American Lit 1,2 Wrld Lit or Cont Voices 1,2 *ELD Support Class Math (recommended) Science Visual & Performing Arts
10th Accelerated Path **May** meet high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement). *Depends on previous credits earned!		ESL 3,4 ESL 3,4 Lit World History Math Science PE	ESL 5,6 English 1,2 or 3,4 U.S. History Math Science Fine/Pract Arts Elective	American Lit 1,2 Wrld Lit or Cont Voices 1,2 Govn/Econ Math Science Fine/Pract Arts Elective (Some students may need an additional year to meet "a-g" requirements, depending upon transferrable credit from native country.)	
11th Traditional Path/ Accelerated Path **May** meet high school graduation requirements. *Depends on previous credits earned!	EL students entering the district at an older age (17 and up) with minimal credits are considered late entrants. For these students, the counselor must carefully evaluate the likelihood that the student will be able to meet graduation requirements in a timely manner. For instance, a student entering the district at age 17 who would not graduate until age 20 or 21 may be better served at a community college. For some, it may be more appropriate for students to attend a district school for a year before moving on to community college; or it may be most appropriate for them to enroll immediately in community college. It will vary from individual to individual.		ESL 3,4 ESL 3,4 Lit World History Math Science PE	ESL 5,6 ESL 5,6 Lit U.S. History Math Science PE	American Lit 1,2 English 1,2 or 3,4 Govn/Econ Math Science Visual & Performing Arts

*ELD Support Class designed to aid English language development. May include: ELD Literacy Advancement Academy, Academic Language Development (ALD), ELD CAHSEE Support, etc.

High School Graduation and College & Career Pathways for EL Students: Traditional 1-6 Schedule

ESL 5-6 Students Entering Grade 9, 10, or 11

H.S. Grad Req and UC/CSU "a-g" Req	Grade 9	Grade 10	Grade 11	Grade 12	Grade 13 (5th year)
9th Traditional Path/ Accelerated Path Meets high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement)	ESL 5,6 ESL 5,6 Lit Math Visual & Performing Arts PE World Language	English 1,2 or 3,4 *ELD Support Class World History Math Science World Language	American Lit 1,2 *ELD Support Class U.S. History Math Science PE	Wrld Lit or Cont Voices 1,2 *ELD Support Class Govn/Econ Math (recommended) Science Elective	
10th Traditional Path **May** meet high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement). *Depends on previous credits earned!		ESL 5,6 ESL 5,6 Lit World History Math Science World Language	English 1,2 or 3,4 *ELD Support Class U.S. History Math Science World Language	American Lit 1,2 *ELD Support Class Govn/Econ Math Science PE	World Lit or Cont Voices 1,2 *ELD Support Class Math (recommended) Visual & Performing Arts PE Elective
10th Accelerated Path		ESL 5,6 English 1,2 or 3,4 World History Math Science PE	American Lit 1,2 *ELD Support Class US History Math Science PE	World Lit or Cont Voices 1,2 *ELD Support Class Govn/Econ Math Science Visual & Performing Arts	(May need additional year to fulfill "a-g" requirements, depending upon transferrable credits from native country.)
11th Traditional Path **May** meet high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement). *Depends on previous credits earned!	EL students entering the district at an older age (17 and up) with minimal credits are considered late entrants. For these students, the counselor must carefully evaluate the likelihood that the student will be able to meet graduation requirements in a timely manner. For instance, a student entering the district at age 17 who would not graduate until age 20 or 21 may be better served at a community college. For some, it may be more appropriate for students to attend a district school for a year before moving on to community college; or it may be most appropriate for them to enroll immediately in community college. It will vary from individual to individual.		ESL 5,6 ESL 5,6 Lit World History Math Science PE	Eng 1,2 or 3,4 *ELD Support Class U.S. History Math Science PE	American Lit 1,2 Wrld Lit or Cont Voices 1,2 Govn/Econ Math Science Visual & Performing Arts (May need an additional year to meet "a-g" requirements, depending upon transferrable credits from native country.)
11th Accelerated Path **May** meet high school graduation requirements **and** UC/CSU "a-g" requirements (see EL overview document regarding world language requirement). *Depends on previous credits earned!			ESL 5,6 English 1,2 or 3,4 U.S. History Math Science PE	American Lit 1,2 Wrld Lit or Cont Voices 1,2 Govn/Econ Math Science Visual & Performing Arts	(May need an additional year to meet "a-g" requirements, depending upon transferrable credits from native country.)

*ELD Support Class designed to aid English language development. May include: ELD Literacy Advancement Academy, Academic Language Development (ALD), ELD CAHSEE Support, etc.

Appendix G. Seattle Public Schools Racial Equity Analysis Tool

Racial Equity Analysis Tool

It is the moral and ethical responsibility and a top priority for Seattle Public Schools to provide Equity Access and Opportunity for every student, and to eliminate racial inequity in our educational and administrative system.

Research indicates that racial disparities exist in virtually every key indicator of child, family, and community well-being. Individual, institutional and structural impacts of race and racism are pervasive and significantly affect key life indicators of success. The **Racial Equity Analysis Tool** lays out a clear process and a set of questions to guide the development, implementation and evaluation of significant policies, initiatives, professional development, programs, instructional practices and budget issues to address the impacts on racial equity. To do this requires ending **individual racism**, **institutional racism** and **structural racism**.

The concept of **racial equity** goes beyond formal racial equality — where all students are treated the same — to fostering a barrier-free environment where all students, regardless of their race have the opportunity to achieve. This means differentiating resource allocations, within budgetary limitations, to serve students with the support and opportunities **they need** to succeed academically.

Why and when should I use it?

- ***Use*** this tool to create an equity lens for educational leaders:
  The Racial Equity Analysis Toolkit provides a set of guiding questions to determine if existing and proposed policies, budgetary decisions, programs, professional development and instructional practices are likely to close the opportunity gap for specific racial groups in Seattle Public Schools.
- ***Apply*** the tool to decrease the opportunity gap, and increase positive outcomes for students of color.

Department/Region/School_____

Facilitator:_____Date_____

Committee/Community members:_____

_____

Decision/Policy:_____

Are you: Making a new decision?_____ Reviewing an existing decision? _____

Expected Outcomes:_____

Have you had any Equity Training from SPS? _____

How many times have you used the Racial Equity Analysis Tool? _____

Please mark the type of decision below:

o Applicable Policy	o Procedure
o Program	o Budget Issue
o Professional Development	o Hiring and Staffing

SEATTLE PUBLIC SCHOOLS

Racial Equity Analysis Tool

Glossary:

Race: Race is a powerful social idea that gives people different access to opportunities and resources. Race is not biological but is real. Race affects everyone, whether we are aware of it or not.

Individual racism: Pre-judgment, bias, stereotypes about an individual or group based on race. The impacts of racism on individuals include members of certain racial groups internalizing privilege and people of color internalizing oppression.

Institutional racism: When organizational programs or policies work to the benefit of certain racial groups and to the detriment of people of color, usually unintentionally or inadvertently.

Structural racism: The interplay of policies, practices, and programs of multiple institutions which leads to adverse outcomes and conditions for people of color compared to members of other racial groups. This occurs within the context of racialized historical and cultural conditions.

Accountable: Responsive to the needs and concerns of those most impacted by the issues you are working on, particularly to communities of color and those historically underrepresented in the civic process.

Educational and Racial Equity: Providing equitable access to opportunities, resources and support for each and every child by intentionally recognizing and eliminating historical barriers, as well as the predictability of personal and academic success based on race, background and/or circumstance.

Racial Inequity: When communities of color do not have access to opportunities and a person's race can predict their social, economic and political opportunities and outcomes.

Stakeholders: Those student, families and community groups impacted by proposed policy, program or budget issue who have potential concerns or issue expertise. Examples might include: specific racial/ ethnic groups, other institutions like Seattle Housing Authority, schools, community-based organizations, staff and families.

Culture: The ways that we each live our lives; including values, language, customs, behaviors, expectations, ideals governing childrearing, the nature of friendship, patterns of handling emotions, social interaction rate, notions of leadership, etc.

Expected Outcomes: A measurable result that is planned for, using the racial equity tool.

SEATTLE PUBLIC SCHOOLS

Racial Equity Analysis Tool

STEP 1: Set Outcomes, Identify and Engage Stakeholders
Leadership sets key racially equitable outcomes and engages stakeholders (SPS staff and community members.)

1. What does your department/division/school define as racially equitable outcomes related to this issue?

2. How will leadership communicate key outcomes to stakeholders for racial equity to guide analysis?

3. How will leadership identify and engage stakeholders: racial/ethnic groups potentially impacted by this decision, especially communities of color, including students who are English language learners and students who have special needs?

STEP 2: Engage Stakeholders in Analyzing Data
Stakeholders (SPS staff and community members) gather and review quantitative and qualitative disaggregated data and specific information to determine impacts or consequences.

1. How will you collect specific information about the school, program and community conditions to help you determine if this decision will create racial inequities that would increase the opportunity gap?

2. Are there negative impacts for specific student demographic groups, including English language learners and students with special needs?

Racial Equity Analysis Tool

STEP 3: Ensuring educational and racial equity /Determine Benefit or Burden
Stakeholders (SPS staff and community members) collaborate to analyze how this policy/ decision/proposal/initiative/budget issue will increase or decrease educational and racial equity.

1. What are the potential benefits or unintended consequences?

2. What would it look like if this policy/decision/initiative/proposal ensured educational and racial equity for every student?

STEP 4: Evaluate Success Indicators and/or Mitigation Plans
Stakeholders (SPS staff and community members) identify ongoing measures of success or mitigation plans for negative impacts

1. How will you evaluate and be accountable for making sure that the proposed solution ensures educational equity for all students, families and staff?

2. What are specific steps you will take to address impacts (including unintended consequences), and how will you continue to partner with stakeholders to ensure educational equity for every student?

Appendix H. Sample Differentiated Professional Development

Provide professional development that is differentiated by staff and teacher roles and responsibilities. Professional development should be designed to meet the unique needs of senior level staff at the central office; content-area departments (directors and coaches); Zone Executive Directors coaches; principals and school teams; general education and EL teachers; special education teachers; and instructional assistants. For example—

a. Professional development for central office, senior staff, and Zone Executive Directors might include EL pedagogy related to program implementation, support and monitoring of EL programs, and data-driven accountability for EL achievement, and a high-level summary of DOJ Settlement Agreement.

b. Professional development for principals might include use of data (ACCESS) on EL achievement, EL model-program implementation, the use of revised walkthrough tools with instructional indicators for ELs, scaffolding and differentiated instruction, student groupings, and master scheduling. DOJ requirements should be covered in greater detail as principals are key to implementing these.

c. Professional development for teachers and other instructional staff should focus on EL instructional strategies and differentiated instruction, implementation of various EL program models, Common Core implementation with ELs, use of EL data, and distinctions between second-language acquisition and language development (related to disabilities and struggling readers).

Ensure differentiated professional development for network chiefs and principals to support the implementation of research-based practices for ELs.

- *Professional Development for Zone Executive Directors*. Sustain and build on districtwide efforts related to school improvement (CSI and TSI) already underway to create ongoing, systemwide learning opportunities for network chiefs and their teams that will enhance staff's understanding of the essential components of EL programs and will allow staff to consult with one another on supports for schools within their zone. For example, Zone Executive Directors and their teams would benefit from understanding—

    - The expected language acquisition progressions and how longitudinal data would reflect the progress of ELs along this continuum

    - Look-fors for determining the fidelity of EL program model implementation

    - Staffing configurations that maximize grade-level planning time for EL instruction, and compliance with DOJ requirements

    - Strategic recruitment and retention efforts to assist principals with hiring of teachers

- ***Professional Development for Principals.*** **Provide learning and joint problem-solving opportunities for principals that—**

  - Build foundational knowledge on academic language development for ELs to ensure instructional coherence in schools.

  - Provide practice using rubrics, such as observation protocols, to collect information and help principals build teacher capacity in accelerating academic and language development of ELs.

  - Share resources such as sample master schedules that would maximize services for ELs and foster strategic collaboration among teachers.

  - Provide practice and assistance by creating student groupings and class assignments that ensure EL services are in reasonable class sizes.

Appendix I. Sample EL Instruction Review: Oakland USD

ELL Review Overview

ELL Review

What is the purpose of the ELL Review?
The purpose of the Site ELL Review is to gather evidence of practice to inform sites of their progress toward providing English Language Learners the academic skills and tools to meet the academic demands of the:

- Common Core State Standards (CCSS)
- Next Generation Science Standards (NGSS)
- California ELD Standards
- California ELA/ELD Framework

The review emphasizes the use of complex, academic language to articulate thinking and reasoning in speaking and writing in ways that are specific to each subject area. Data from the initial ELL Review will give an opportunity to sites to begin the collaborative design of a plan between site leaders and ELLMA partners that addresses the ELL Site Review Focal Indicators chosen by the site.

The ELL Review is grounded in the Essential Practices for ELL Achievement. The Five Essential Practices summarize ELLMA's theory of change to ensure English Language Learners are on track to graduate college, career, and community ready. They are designed to both guide and hold accountable all OUSD educators as we take **collective** responsibility for the academic, linguistic, and socio-emotional needs of our ELLs.

What are the components of the ELL Review?
Site ELL Reviews are generally conducted at the beginning and end of the school year. The components of the Site ELL Review are:

- ❑ Essential Practices Self-Assessment
- ❑ Classroom Walkthrough
- ❑ Optional Tools:
  - ❑ Teacher Survey
  - ❑ Parent/Family Focus Group
  - ❑ Student Survey and/or Focus Group
  - ❑ Principal Interview

Tools:

-
- Site ELL Review | Master Indicators and overview
- Essential Practices Self-Assessment
- Site ELL Review | 19-20 Focal Indicators
- Site ELL Review | Focal Indicators Classroom Observation Tool
- Optional Tools
  - Site ELL Review | Teacher Survey 19-20
  - Site ELL Review | Student Survey 19-20
  - Site ELL Review | Parent Focus Group
  - Site ELL Review | Principal Interview

Which sites will experience ELL Reviews?
We are conducting ELL Reviews at all of our Partner and Focus Schools, a cohort of schools we are working with closely this year to improve outcomes of ELLs. These were determined based on data analysis, network superintendent recommendation, and principal agreement. For more on our Differentiated Site Support model, see here. Other schools ELL Reviews may be done upon request of site leadership.

When will ELL Reviews take place and how will data be used?
All Reviews will be completed by the end of October in the case of Partner Schools or prior to an ELL-focused Cycle in the case of Focus schools. Data will be shared with site leaders and used to co-construct partnership goals including identification of ELL Review focal indicators that will be the basis of professional learning and support. ELLMA will do focused progress monitoring on the sites' focal indicators to provide an on-going data source to drive instructional and programmatic improvement and to evaluate the impact of ELLMA's support.

Site ELL Review Master Indicators

School: *Collection Tool:* *Date:*

Additional Info and Context (i.e. Teacher name, Grade, CLO, student grouping, teacher role, # of stakeholders):

Indicators	1 No Evidence Observed	2 Limited Evidence	3 Some Evidence	4 Clear & Consistent Evidence	Notes
Essential Practice #1: Access and Rigor (High Expectations and Sufficient Support)					
1.1 Students engage with texts or tasks that are aligned to grade-level standards and require critical thinking and/or application.					
1.2 Students effectively access language resources and other scaffolds to support their understanding (pictorial charts, sentence frames, peer support, etc.). Teacher makes grade-level and complex material / content comprehensible without simplifying material (amplifying, not simplifying).					
1.3 Students receive consistent messaging that academic and post-secondary success is attainable for all.					
1.4 Classes and master schedule are configured to minimize isolation of ELLs and maximize inclusion in mixed fluency settings and grade-level core content.					
Essential Practice #2: Language Development Embedded in Content (Designated & Integrated ELD)					
2.1 Classroom environment is language rich and is structured to facilitate student-student interaction and collaboration.					
2.2. Academic language related to the task and objective is explicitly named, taught, rehearsed, and reinforced.					
2.3 Students develop and use language to explain ideas, express understanding and negotiate meaning. Teacher engages students in activities to fortify complex output and to foster academic discussion to support content and language development.					
2.4 Students have opportunities to learn how language works to make meaning.					
2.5 Site has clear structures, expectations, and support for daily Designated ELD.					
2.6 Site-based structures support ongoing professional development and inquiry to support all teachers to include language practices and embedded supports for ELLs in planning, instruction, and assessment.					

**GREY BOXES = MUST ANSWER FOR CLASSROOM OBSERVATION*

Indicators	1	2	3	4	Evidence
Essential Practice #3: Checking for Understanding and Formative Assessment (Data-Driven Decisions)					
3.1 Teacher checks for understanding to gather evidence of content and language learning and to adjust instruction during the lesson.					
3.2 Teacher uses multiple data sources refine practice.					
3.3 Site uses multiple data sets on an ongoing basis to place and effectively monitor progress as well as to inform program design.					
3.4 Site has systems in place to progress monitor and support ELLs with disabilities.					
Essential Practice #4: Asset-Based Approach					
4.1 Welcoming environment reflects students' home languages and cultures.					
4.2 Students' prior knowledge is activated and built upon using culturally and linguistically responsive practices.					
4.3 Teacher supports transfer of skills across languages through contrastive analysis and explicit instruction on biliteracy transfer.					
4.4 School provides programming, structures, or opportunities for students to develop bilingualism/ biliteracy.					
Essential Practice #5:Addressing the Whole Child					
5.1 Students across all language proficiency levels take risks and actively participate. Teacher creates a safe space for learning through SEL and trauma-informed practices					
5.2 Families are informed and engaged to be active participants and contributors to their child's education and the broader school community.					
5.3 The site systematically addresses issues of bullying and exclusion on the basis of language and culture through anti-bullying curriculum and Restorative Justice practices.					

**GREY BOXES = MUST ANSWER FOR CLASSROOM OBSERVATION*

Appendix J. Individuals Interviewed

Thomas Flanagan, Chief Academic Officer
Jennifer Efflandt, Director of ELs
Charles Ruggario, Legal Counsel, Providence City Solicitor
Aubrey Lombardo, Legal Counsel
Ronald Tarro, Budget Director
Anthony Vescera, Coordinator of Grants
Laura Hart, Director of Communications
Janet Pichardo, Director of Family Engagement
Susan Chin, Elementary Zone Executive Director
Gina Piccard, Middle School Zone Executive Director
Marc Catone, High School Zone Executive Director
Nkoli Onye, Executive Director of Performance Management
Jennifer Lepre, Chief Executive Director of Human Resources
Cheryl McCreight, Director of Operations
Manuela Raposa, Director of Student Placement and Registration
Gina Silvia, Supervisor of Scheduling and Guidance
Simona Simpson Thomas, Director of Multiple Pathways
Ernest Cox, Supervisor of Advanced Academics
Marco Andrade, Executive Director of Systemwide Performance
Clayton Ross, Assessment Coordinator
Cameron Berube, Director of Curriculum and Instruction
Clarise Brooks, ELA Supervisor
Ginamarie Masiello, Math Supervisor
Edda Carmadello, Executive Director of Specialized Instruction
Roland Sassaville, High School EL Specialist/Coach
Jodi Anthony, High Schools EL Specialist/Coach
Holly Bubier, Middle School EL Specialist/Coach
Marie Word, Elementary EL Specialist/Coach
Nelia Fontes, Elementary EL Specialist/Coach
Liana Lombardo, ESL Teacher
Jaime Cannarozzi, ESL Teacher
Sarah Reis, ESL Teacher
Audra Cornell, ESL Teacher
Lulie Motta, Newcomer Teacher
Mary Ellen Raposa, ESL Teacher/Coach
Soledad Barreto, Director of Newcomer Program
Kimberly Leimer, 360 High
Nicholas Hemond, School Board President
Nina Pande, School Board Member
Rebecca Filomeno, RIDE EL Advisory Council Member
Jackie Nelson, RIDE EL Advisory Council Member

Maura Galvao, Executive Director of Member Services, Providence Teacher's Union
Maribeth Calabro, President, Providence Teacher's Union

Parent Focus Group—Leviton Dual Language, Highlander Charter School, Harry Kizirian Elementary, Lilian Feinstein Elementary, Veazie St. Elementary, Esek Hopkins Middle School, Gilbert Stuart Middle School, DelSesto Middle School
Marlene Castillo
Karina Rosa
Martha Arias
Olga Santos
Carlos Canela
Luis R. Fuentes
Ana E. Mago
Mariam Moreno
Ursula Francisco
Altagracia Urena
Maria Polleranop
Claudia Guevara
Jose Gonzalez
Leonel Perez
Claudia R. Arias ***[sic]***

Appendix K. Documents Reviewed

Budget/Finance/Purchasing

1. EL Categorical Funding Plan and Budget Form
2. 2020-2021 Budgeting and Purchasing Timeline (Procurement Timeline Internal)
3. RFP for K-12 Literacy Products
4. RFP for Bilingual (Spanish and English) Curricular Resources (Criteria for Selecting Instructional Materials)

District Data Requests and Files[107]

Enrollment

5. Number and percentages of ELs and general education students, by school and district total. The number and percentage of Former ELs.[108]
6. Number and percentages of students participating in the district's special education programs, by school, by ELs status and language
7. Number and percentages of students participating in the districts' gifted and talented programs, by school by ELs status and language

Achievement

8. Data for the past three years of student performance on the state assessments (ELA, Math, and Science), broken-out by sub-groups by ELP level for ELs[109]
9. Data for the past three years of EL performance on English Proficiency Assessments by level of proficiency, and if available, by number of years in the EL program, and initial ELP level[110]
10. EL reclassification rates by grade level[111]
11. Number and percentage of students taking advanced courses in middle and high school, by race/ethnicity and EL status (EL and former EL)
12. Number and percentage of students enrolled in magnet or examination schools by race/ethnicity and EL status (EL and former EL)
13. Access for ELs Data Brief 2017

District Documents

14. Advanced Academics (Requirements)
15. Building Administrator Guidebook
16. Classical [High School] Entrance Criteria

[107] Supplemental data files were received in July 2019. These files contained much of the same information in the original data request in addition to home language survey responses by student.
[108] Disaggregation by program model was also requested. The district was unable to provide EL program model data due to inconsistent and unreliable data.
[109] Former EL and race/ethnicity data were requested but not provided.
[110] Initial ELP level was requested but not provided. WIDA ACCESS scores by years in program were only available for 2018.
[111] Data by time in program and initial ELP were requested but not provided. The district presented reclassification rate data as the number of students meeting RIDE exit criteria based on ACCESS scores.

17. School Zones 2018-2019
18. Strategic Plan
19. ELA Grade 3 Curriculum – Grades K, 3, 7, 9
20. Math Curriculum – Grades K, 3, 7, 9
21. Science Curriculum – Grades 3, 7, 9
22. Social Studies Curriculum – Grades K, 3, 7, 9

EL/ELD Procedures and Guidelines

23. Elementary DOJ EL Scheduling
24. Elementary ELD Course Numbers 2019-2020
25. Elementary Guidance One Pager
26. 2018.08.31 EL Scheduling Guidelines for Elementary
27. 2018.08.31 EL Scheduling Guidelines for Middle School
28. 2018.08.31 EL Scheduling Guidelines for High School
29. English EL Programs foe SY 2019-2020
30. Handbook for EL Instruction and Guidance
31. HS Scheduling Guidelines 2019-2020
32. MS Updated ELD Course Numbers 2019-2020
33. PK-12 Language Proficiency Screener – Bilingual Spanish
34. RI EL Identification Process Screening and Placement for English learners

HR/Evaluation & Professional Development

35. MS EL Coordinator Job Description
36. Preference sheets Middle and High School 17-18 SY
37. Preference sheets Middle and High School 18-19 SY
38. Providence Teacher Contract 2017
39. Principal and AP Evaluations
40. Sheltered Strategies Look for Tool DRAFT
41. Teacher Job Descriptions Postings
42. Teacher Evaluation Rubric
43. List of PD Courses for Gen. Ed and EL Teachers
44. PPSD Coaching Common Language
45. EL Professional Development Session #1. Getting to Know Our ELs (ppt)

Other

46. Approved DOJ Objectives
47. Translation & Interpretation Services from the Communications Office
48. Rhode Island's Every Student Succeeds Act State Plan. Submitted to U.S. Department of Education—September 14, 2017. Final Version—March 29, 2018
49. Comprehensive School Improvement Plan (CSIP) model template
    http://www.ride.ri.gov/InformationAccountability/Accountability/SchoolImprovement.aspx
    http://www.ride.ri.gov/InformationAccountability/Accountability/SchoolImprovement.aspx

50. Providence Public Schools: An Assessment of the Need for District Transformation to Accelerate Student Achievement[112]

[112] Bachand, M., & Guyer, N. (2015, May). *Providence Public Schools: An assessment of the need for district transformation to accelerate student achievement*. Mass Insight Education.

Appendix L. Council Reviews

History of Strategic Support Teams

The following is a history of the Strategic Support Teams provided by the Council of the Great City Schools to urban school districts over the last 20 years.

City	Area	Year
Albuquerque		
	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005 & 2018
	Legal Services	2005
	Safety and Security	2007
	Research	2013
	Human Resources	2016
	Special Education	2018
Anchorage		
	Finance	2004
	Communications	2008
	Math Instruction	2010
	Food Services	2011
	Organizational Structure	2012
	Facilities Operations	2015
	Special Education	2015
	Human Resources	2016
Atlanta		
	Facilities	2009
	Transportation	2010
Aurora		
	Information Technology	2019
Austin		
	Special Education	2010
Baltimore		
	Information Technology	2011
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010

	Human Resources	2014
	Financial Operations	2015
Boston		
	Special Education	2009
	Curriculum & Instruction	2014
	Food Service	2014
	Facilities	2016
Bridgeport		
	Transportation	2012
Broward County (FL)		
	Information Technology	2000
	Food Services	2009
	Transportation	2009
	Information Technology	2012
	Information Technology	2018
	Facilities Operations	2019
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
	Special Education	2014
	Facilities Operations	2019
Caddo Parish (LA)		
	Facilities	2004
Charleston		
	Special Education	2005
	Transportation	2014
Finance		2019
Charlotte-Mecklenburg		
	Human Resources	2007
	Organizational Structure	2012
	Transportation	2013
Cincinnati		
	Curriculum and Instruction	2004

	Curriculum and Instruction	2009
	Special Education	2013
Chicago		
	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012
	Bilingual Education	2014
Christina (DE)		
	Curriculum and Instruction	2007
Clark County	Operations	2019
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
	Special Education	2017
Columbus		
	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Transportation	2009
Dallas		
	Procurement	2007
	Staffing Levels	2009
	Staffing Levels	2016
Dayton		
	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001

	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005
	Curriculum and Instruction	2008
	Organizational Structure	2017
Denver		
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
	Curriculum and Instruction	2008
	Common Core Implementation	2014
Des Moines		
	Budget and Finance	2003
	Staffing Levels	2012
	Human Resources	2012
	Special Education	2015
	Bilingual Education	2015
Detroit		
	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004
	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009
	Human Resources	2009
	Special Education	2018
El Paso		
	Information Technology	2019
Fresno		
	Curriculum and Instruction	2012
	Special Education	2018
Guilford County		
	Bilingual Education	2002

	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
	Transportation	2017
Hillsborough County		
	Transportation	2005
	Procurement	2005
	Special Education	2012
	Transportation	2015
Houston		
	Facilities Operations	2010
	Capitol Program	2010
	Information Technology	2011
	Procurement	2011
Indianapolis		
	Transportation	2007
	Information Technology	2010
	Finance and Budget	2013
	Finance	2018
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
	Curriculum and Instruction	2017
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
	Facilities operations	2015
	Budget and finance	2015
Kansas City		
	Human Resources	2005
	Information Technology	2005
	Finance	2005
	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006

	Program Implementation	2007
	Stimulus Planning	2009
	Human Resources	2016
	Transportation	2016
	Finance	2016
	Facilities	2016
	Curriculum and Instruction	2016
Little Rock		
	Curriculum and Instruction	2010
Los Angeles		
	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville		
	Management Information	2005
	Staffing Levels	2009
	Organizational Structure	2018
Memphis		
	Information Technology	2007
	Special Education	2015
	Food Services	2016
	Procurement	2016
Miami-Dade County		
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
	Information Technology	2013
Milwaukee		
	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
	Human Resources	2013

	Information Technology	2013
Minneapolis		
	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
	Transportation	2016
	Organizational Structure	2016
Nashville		
	Food Service	2010
	Bilingual Education	2014
	Curriculum and Instruction	2016
Newark		
	Curriculum and Instruction	2007
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
	Curriculum and Instruction	2012
	Transportation	2018
	Finance	2018
	Facilities Operations	2018
Omaha		
	Buildings and Grounds Operations	2015
	Transportation	2016
Orange County		
	Information Technology	2010
Palm Beach County		
	Transportation	2015
	Safety & Security	2018
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003

	Facilities	2003
	Transportation	2003
	Human Resources	2004
	Budget	2008
	Human Resource	2009
	Special Education	2009
	Transportation	2014
Pittsburgh		
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
	Organizational Structure	2016
	Business Services and Finance	2016
	Curriculum and Instruction	2016
	Research	2016
	Human Resources	2018
	Information Technology	2018
	Facilities Operations	2018
Portland		
	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Prince George's County		
	Transportation	2012
Providence		
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special Education	2011
	Bilingual Education	2011
	Bilingual Education	2019
Puerto Rico		
	Hurricane Damage Assessment	2017
	Bilingual Education	2019
Reno		
	Facilities Management	2013
	Food Services	2013
	Purchasing	2013

	School Police	2013
	Transportation	2013
	Information Technology	2013
Richmond		
	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
	Human Resources	2014
	Financial Operations	2018
Rochester		
	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
Sacramento		
	Special Education	2016
San Antonio		
	Facilities Operations	2017
	IT Operations	2017
	Transportation	2017
	Food Services	2017
	Human Resource	2018
San Diego		
	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco		
	Technology	2001
St. Louis		
	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
St. Paul		
	Special Education	2011
	Transportation	2011
	Organizational Structure	2017

Seattle		
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
	Capital Projects	2013
	Transportation	2019
Stockton		
	Special Education	2019
Toledo		
	Curriculum and Instruction	2005
Washington, D.C.		
	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005
	Curriculum and Instruction	2007
	Common Core Implementation	2011
Wichita		
	Transportation	2009
	Information Technology	2017