

**Douglas**

**Targeted and Focused Monitoring Report**

**Review Dates:** **April 8, 2024 - May 5, 2024**

**Date of Final Report:** **05/16/2024**



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Commissioner of Elementary and Secondary Education

During the 2023-2024 school year, Douglas participated in a Targeted and Focused Monitoring Review conducted by the Department’s Office of Language Acquisition (OLA). The purpose of the Targeted and Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on English Learner Education.

District/charter schools are reviewed every six years through Targeted and Focused Monitoring. There are 12 ELE criteria that target implementation of the requirements related to ELE programs under state and federal law and regulations:

ELE 1: Annual English Language Proficiency Assessment

ELE 2: State Accountability Assessment

ELE 3: Initial Identification of ELs and FELs

ELE 5: ELE Program and Services

ELE 6: Program Exit and Readiness

ELE 7: Parent Involvement

ELE 8: Declining Entry to a Program

ELE 10: Parental Notification

ELE 13: Fallow-up Support

ELE 14: Licensure Requirements

ELE 15: Professional Development Requirements

ELE 18: Records of ELs

The monitoring process differs depending on the thorough data analysis the Department conducts.

The review process includes the following:

1. Self-Assessment

* District reviews English Learner Education documentation for required elements including document uploads.
* District reviews a sample of English learner (EL) student records selected across grade levels and EL focus areas such as opt-out students, former ELs and students and/or parents who need translation and/or interpretation.
* Upon completion of these two internal reviews, the district’s self-assessment is submitted to the Department for review.

1. Verification

* Review of EL student records: The Department may select a sample of student records and request certain documentation to be uploaded to the WBMS as evidence of implementation of the ELE criteria.
* Review of additional documents for English Learner Education
* Surveys of parents of ELs: Parents of ELs are sent a survey that solicits information regarding their experiences with the district’s implementation of English Learner Education program(s), related services, and procedural requirements.
* Interviews of staff
* Classroom observations as applicable
* Parent and student focus groups as applicable

**Report:**

Within approximately 20 business days of the onsite visit, the onsite chairperson will forward to the superintendent or charter school leader the findings from the Targeted and Focused Monitoring Review. Within 10 business days of receipt of the findings, the district reviews and comments on the findings for factual accuracy before they are finalized. After the report is finalized, districts develop a Continuous Improvement and Monitoring Plan (CIMP) for any criteria receiving a rating of "Partially Implemented," "Not Implemented," and “Implementation in Progress.” The CIMP outlines an action plan, identifies the success metric, describes the measurement mechanism and provides a completion timeframe to bring those areas into compliance with the controlling statute or regulation. District and charter schools are expected to incorporate the CIMP actions into their district and school improvement plans, including their professional development plans.

# **DEFINITION OF COMPLIANCE RATINGS**

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| **Implemented** | The requirement is substantially met in all important aspects. |
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| **Implementation in Progress** | This rating is used for criteria containing new or updated legal requirements and means that the district has implemented any old requirements contained in the criterion and is training staff or beginning to implement the new requirements in such a way that the onsite team anticipates that the new requirements will be implemented by the end of the school year. |
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| **Partially Implemented** | The requirement, in one or several important aspects, is not entirely met. |
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| **Not Implemented** | The requirement is totally or substantially not met. |
| **Not Applicable** | The requirement does not apply to the school district or charter school. |

For more information on the Targeted and Focused Monitoring approach, please visit the Department’s [website](https://www.doe.mass.edu/ele/cpr/default.html).

Douglas

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **English Learner Education Requirements** |
| **IMPLEMENTED** | ELE 1, ELE 2 |
| **PARTIALLY**  **IMPLEMENTED** | ELE 3, ELE 5, ELE 6, ELE 7, ELE 8, ELE 10, ELE 14, ELE 18 |
| **NOT IMPLEMENTED** | ELE 13, ELE 15 |

| **Improvement Area** **1** |
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| **Criterion:** ELE 3 - Initial Identification of ELs and FELs |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of district documentation reveals that the district does not have clear policies and procedures to: 1) explain how the Home Language Survey is used to identify potential English Learners; 2) identify Former English Learners; 3) Identify newcomers; 4) Identify ELSWD; 5) identify SLIFE; or 6) identify who is responsible for each step in the identification process.  A review of district documents and interviews with staff members reveal that the district does not use the cut screener scores from the Department to identify English Learners.  Interviews with staff members and a review of student records indicate that the district considers additional information, including disability status, suspected disability status, and parent preference to determine if a student is an English Learner, regardless of Home Language Survey indication and screener results.  Documents submitted by the school district indicate that the W-APT is authorized to screen kindergarteners.  The Department concludes that the district does not properly identify students who need English language support and the current initial identification procedures and practices are not in in compliance with 603 CMR 14.02(1), which requires districts and charter schools to establish procedures in accordance with the Department’s guidelines. |

| **Improvement Area 2** |
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| **Criterion:** ELE 5 - Program Placement and Structure |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** The Department conducted a review of the district's ELE program and identified the following compliance issues:   * The district does not have an ESL curriculum that is integral to an effective ELE program in which ELs of all grades and proficiency levels become English proficient at a rapid pace. * The district lacks policies to place students in ESL classes in appropriate groupings with students of similar grade and English proficiency levels. * The district has not adopted procedures to identify English learners who do not meet English proficiency benchmarks and has not established a process for the district to: (i) identify areas in which identified English learners needs improvement and establish personalized goals for the identified English learners to attain English proficiency; (ii) assess and track the progress of English learners in the identified areas of improvement; (iii) review resources and services available to identified English learners that may assist said learners in the identified areas of improvement; and (iv) incorporate input from the parents or legal guardian of the identified English learner as required under M.G.L. c. 71A, §11. * SEI content classes provide substantial learning materials which are not in English to teach content the content standards. While leveraging native language and supporting translanguaging in moderation are important strategies, relying on direct translation too much at the expense of incorporating sheltering strategies does not promote the rapid learning of English nor grade level understanding of the content areas in SEI classes. * The district lacks the ESL capacity to effectively provide essential components of an effective ELE programming, such as providing time for ESL collaboration with content teachers to support ELLs in content classes, to identify language objectives and to ensure that language objectives are included in SEI lessons. * Not all English Learners, particularly those with disabilities who are also enrolled in a substantially separate program, are receiving ESL services. * English Learners in some buildings do not have equitable access to some academic programs available in the district. For example, a review of student records and conversations with staff members revealed that some ELs and FELs are discouraged by staff members from taking world language courses. |

| **Improvement Area 3** |
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| **Criterion:** ELE 6 - Program Exit and Readiness |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation submitted by the district indicates that the district's policies and procedures for exiting students do not align with the Department's guidelines.  The district's reclassification procedures state that students may be exited from the program if a team of professionals determines that a student will no longer benefit from ESL instruction due to some issues such as years in the program, learning disability, emotional trauma, or absenteeism even if the student is not English proficient based on ACCESS for ELLs results.  The Department concludes that the district's current reclassification procedures are not in compliance with 603 CMR 14.02 that requires districts to establish exit criteria in accordance with the Department guidelines. |

| **Improvement Area 4** |
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| **Criterion:** ELE 7 - Parent Involvement |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews indicated that although the district provides translated documents and interpretation for families who need them, it does not have policies and procedures in place to ensure that competent, appropriately trained staff or outside resources provide translation and interpretation.  Interviews and a review of district documentation indicated that although language assistance is available, staff members do not know what resources are available or how to access them.  The Department has determined that the district does not always provide effective language assistance to parents whose preferred language is not English and therefore, does not always meet the obligation to communicate effectively with parents to include them in matters pertaining to their children's education. |

| **Improvement Area 5** |
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| **Criterion:** ELE 8 - Declining Entry to a Program |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Submitted documentation and interviews with staff members indicate that the district does not have proper policies and procedures to require annual written confirmation of the parents' request to withdraw their children from an English learner education program or for the district to monitor said students' progress as required by G.L. c. 71A Section12. |

| **Improvement Area 6** |
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| **Criterion:** ELE 10 - Parental Notification |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews with staff members and a review of student records indicate that the district is not translating report cards into the parents' preferred languages.  A review of documents indicate that the district does not send notification letters to the parents or guardians of all ELs to inform them about the students' program placement, parental rights and other ELE program related information as required in 603 CMR 14.02. |

| **Improvement Area 7** |
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| **Criterion:** ELE 13 - Follow-up Support |
| **Rating:** Not Implemented |
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| **Description of Current Issue:** A review of documentation submitted indicates that there are no formal monitoring mechanisms in place to indicate whether language or academic deficits may exist for students who have been exited from the ELE program and provide support to those students, if needed.  A review of documents submitted by the district and conversations with staff members indicate that there are no written procedures in place to support FELs who are found by the monitoring process to not be succeeding in the general curriculum. |

| **Improvement Area 8** |
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| **Criterion:** ELE 14 - Licensure Requirements |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Staff interviews and the relevant SEI Endorsement data indicated that most core academic teachers assigned to provide sheltered English instruction to English learners hold the SEI Teacher Endorsement, but some do not. |

| **Improvement Area 9** |
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| **Criterion:** ELE 15 - Professional Development Requirements |
| **Rating:** Not Implemented |
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| **Description of Current Issue:** A review of documentation and interviews with staff members reveal that district professional development plans do not include district level activities for teachers to earn 15 PDPs related to SEI, English as a Second Language or Bilingual Education in order to be eligible to renew their licenses. The Department concludes that this practice is not in compliance with 603 CMR 44.06(1) which requires districts to develop a professional development plan and provide training for teachers in second language acquisition techniques for the re-certification of teachers and administrators. |

| **Improvement Area 10** |
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| **Criterion:** ELE 18 - Records of ELs |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of the documents requested from the district indicated that the district does not consistently keep all the required documents in students' EL records. |