



# Illinois State Board of Education

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**James T. Meeks**  
Chairman

**Tony Smith, Ph.D.**  
State Superintendent of Education

April 19, 2016

Dr. Don White, Superintendent  
Hinsdale CCSD 181  
115 W. 55<sup>th</sup> Street  
Clarendon Hills, IL 60514

Dear Superintendent White:

On **December 15-16, 2015** the Division of English Language Learning (DELL) of the Illinois State Board of Education conducted an on-site monitoring review of Hinsdale CCSD 181's implementation of Article 14C of the Illinois School Code (105 ILCS 5/14C), Part 228 of the 23 Illinois Administrative Code (23 Ill. Adm. Code 228), Part 1, Section 1.88 of the 23 Illinois Administrative Code (23 Ill. Adm. Code 1.88), Title III of the No Child Left Behind Act of 2001 (20 USC 6801 et. seq.), and any other applicable laws.

DELL issued a compliance monitoring report on **January 16, 2016**, outlining findings that required corrective actions and received Hinsdale CCSD 181's response on **February 16, 2016** with additional documentation submitted on **March 7, 2016**. DELL issued a report summarizing the results of our review of your Corrective Action Plan on **March 9, 2016**. Hinsdale CCSD 181's updated response and additional documentation received on **March 17, 2016** with additional documentation submitted on **April 12, 2016** satisfactorily addressed the findings identified in the compliance monitoring report.

We appreciate your work in responding to the concerns outlined in the report. We look forward to continuing to work with your District to ensure that all students who are ELs have access to quality programs, become proficient in English, and achieve academic success. If you have any questions, please do not hesitate to contact DELL at 312-814-3661 or [sserrano@isbe.net](mailto:sserrano@isbe.net).

Sincerely,

Sonia Serrano  
Principal Consultant  
English Language Learning Division

cc: Kurt Schneider, Program Director  
Barbara Folan, ELL Specialist/Instructional Coach  
David González Nieto, Division Administrator

**COMPONENT 1: IDENTIFICATION OF ELIGIBLE STUDENTS**

This component examines whether the District implements the Home Language Survey to identify students of non-English background and appropriately screens the students for program eligibility according to the state requirements.

<b>Component Number</b>	<b>Legal Standard</b>
<b>1.1 - 1.4</b>	<b>Home Language Survey</b> <b>23 Ill. Adm. Code 228.15</b> (a) <i>Each school district shall administer a home language survey with respect to each student in preschool, kindergarten or any of grades 1 through 12 who is entering the district's schools or any of the district's preschool programs for the first time, for the purpose of identifying students who have a language background other than English. The survey should be administered as part of the enrollment process or for preschool programs, by the first day the student commences participation in the program. The survey shall include at least the following questions, and the student shall be identified as having a language background other than English if the answer to either question is yes: (1) Whether a language other than English is spoken in the student's home and, if so, which language; and (2) Whether the student speaks a language other than English and, if so, which language. (b) The home language survey shall be administered in English and, if feasible, in the student's home language. (c) The home language survey form shall provide spaces for the date and the signature of the student's parent or legal guardian. (d) The completed home language survey form shall be placed into the student's temporary record as defined in 23 Ill. Adm. Code 375 (Student Records).</i>
<b>Rating:</b> Partially Implemented  <b>District Response Required:</b> Yes	
<b>Findings:</b> As evidenced by a review of student files and documentation obtained from the District, it has been found that: <ul style="list-style-type: none"><li>• The online HLS is only administered in English.</li><li>• While the printed version of the HLS indicates an electronic signature, the screen shoot of the online registration system only shows one signature page located at the end of the entire registration package; a separate and exclusive signature and date line is not found for the HLS.</li></ul>	

**DISTRICT'S FIRST RESPONSE – February 16, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

The Assistant Superintendent of Business and Operations and the Student Information Specialist will create a separate and exclusive signature for the HLS for online registration. The ELL Coordinator will provide the translated versions of HLS from the ISBE website to all registrars in each attendance center and the District Office. The Assistant Superintendent of Business and Operations has begun training each registrar at each attendance center about the need for a translated HLS when registration begins on February 1st. In addition, all registrants will fill out a paper home language survey as well to keep in files. We have begun the process with Preschool Registration on 2/1/2016. We will provide translated Home Language Surveys for Kindergarten Registration at each attendance center on February 23rd and 24th. The expected date of completion will be on-going as we continue to register students for FY 2017.

**List and Attach Evidence of Implementation of the Corrective Action**

**Screen shot of HLS on registration page  
HLS in native languages**

**ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**COMPONENT 2: STUDENT ASSESSMENT AND LANGUAGE ACQUISITION SERVICES**

This component examines whether the District annually assesses the English language proficiency of the English learners, provides adequate language acquisition services, and monitors the progress of students who met the exit criteria.

<b>Component Number</b>	<b>Legal Standard</b>
<b>2.1</b>	<p><b>Annual English Language Proficiency Assessment</b>  <b>23 Ill. Adm. Code 228.25 (b)(1)</b> <i>School districts must annually assess the English language proficiency, including aural comprehension (listening), speaking, reading, and writing skills, of all children of all English learners in kindergarten and any of grades 1 through 12 (Section 14C-3 of the School Code) using the English language proficiency assessment prescribed by the State Superintendent of Education. This assessment shall be administered during a testing window designated by the State Superintendent, for the purpose of determining individual students' continuing need and eligibility for bilingual education services. The annual assessment shall be based on the 2012 Amplification of the English Language Development Standards Kindergarten-Grade 12 (2012), published by the Board of Regents of the University of Wisconsin System on behalf of the WIDA Consortium, University of Wisconsin-Madison, 1025 West Johnson Street, MD#23, Madison WI 53706, and posted at <a href="http://wida.us/standards/eld.aspx">http://wida.us/standards/eld.aspx</a>. No later amendments to or editions of these standards are incorporated by this Section. (3) Each student who is not enrolled in a program under this Part but who has been identified as an English learner shall be required to participate in the assessment each year until he or she achieves a "proficient" score.</i></p>
<p><b>Rating:</b> Partially Implemented</p> <p><b>District Response Required:</b> Yes</p>	
<p><b>Finding:</b>            According to Student Information Systems (SIS) data review, the District did not assess 4 students out of 117 identified as EL with the ACCESS test during the FY15 school year.</p>	
<p><b>DISTRICT'S FIRST RESPONSE – February 16, 2016</b></p>	
<p><b>Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit</b></p>	

**List and Attach Evidence of Implementation of the Corrective Action**

Guidance from ISBE indicated that students who moved in during the testing window did not need to be tested. See the attached documentation:

<http://www.isbe.net/bilingual/pdfs/access/access-guid-el-transfer.pdf>

[http://www.isbe.net/bilingual/pdfs/access/access\\_testing\\_guidelines\\_new\\_students.pdf](http://www.isbe.net/bilingual/pdfs/access/access_testing_guidelines_new_students.pdf)

Attached are the registration dates of three of our students who did not need to be tested per ISBE’s guidance. The 2015 ACCESS window was from 01/12/2015 until 2/13/2015. Two of the students (siblings) moved in during the testing window 1/20/2015. One student did not move in until after the testing window on 3/09/2015. The fourth student was erroneously identified as LEP. The child was eligible for services in Preschool. Once the child took the MODEL screener, the child was no longer eligible for services with a raw score of 30 and listening and a raw score of 10 on speaking. The composite score of 6.0 indicates the child was not eligible for EL services in Kindergarten. Please see the attached screener data as evidence. The EL coordinator will provide staff development to the EL Department on how to appropriately indicate LEP status in Infinite Campus which uploads data for the ELL report.

**ISBE’S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

Component Number	Legal Standard
2.2	<p><b>Individualized Educational Plan (IEP) Teams for EL students</b>  <b>23 Ill. Adm. Code 226.210 (e)</b> <i>The IEP Team shall include a qualified bilingual specialist or bilingual teacher, if the presence of such a person is needed to assist the other participants in understanding the child's language or cultural factors as they relate to the child's instructional needs. If documented efforts to locate and secure the services of a qualified bilingual specialist are unsuccessful, the district shall instead meet the requirements set forth in Section 226.150(b) of this Part.</i></p>
<p><b>Rating:</b> Partially Implemented</p> <p><b>District Response Required:</b> Yes</p>	
<p><b>Finding:</b>  Although staff indicated during interviews that bilingual specialists are invited to meetings, an audit of the student files did not show the appropriate signatures on the IEP sign in sheets.</p>	
<p><b>DISTRICT'S FIRST RESPONSE – February 16, 2016</b></p>	
<p><b>Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit</b></p>	
<p><b>List and Attach Evidence of Implementation of the Corrective Action</b></p> <p>The ELL Coordinator met with the Pupil Service Administrators and advised them of all EL students in respective buildings throughout the District. The Pupil Service Administrators advised all case managers of students who are LEP and have an IEP to ensure EL teachers are invited to IEP meetings. This will be implemented immediately.</p>	
<p><b>ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016</b></p>	
<p><b>Status of Corrective Action:</b>  <input type="checkbox"/> Accepted      <input checked="" type="checkbox"/> Partially Accepted      <input type="checkbox"/> Not Accepted</p>	
<p><b>Basis for Partial Acceptance or Non Acceptance:</b>  Documentation is required as evidence of implementation.</p>	

**Required Elements of Corrective Action and Progress Reports:**

Please submit two copies of the IEP sign-in sheets from the date of compliance visit to now as evidence of implementation.

**DISTRICT'S SECOND RESPONSE – March 14, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

We will submit two copies of the IEP sign-in sheets from the date of compliance visit to now as evidence of implementation.

**List and Attach Evidence of Implementation of the Corrective Action**

- Two copies of the IEP sign-in sheets

**ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN – April 19, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**COMPONENT 4: CURRICULUM AND INSTRUCTION**

This component examines whether the District implements a curriculum that is standards-based and supported by appropriate instructional materials.

Component Number	Legal Standard
4.1	<p><b>Standards Aligned Curriculum</b>  <b>20 USC 6826 (d)(3)</b> the eligible entity has based its proposed plan on scientifically based research on teaching limited English proficient children; (4) the eligible entity will ensure that the programs will enable children to speak, read, write, and comprehend the English language and meet challenging State academic content and student academic achievement standards.</p> <p><b>23 Ill. Adm. Code 228.30 (b)(4)</b> Beginning with the 2012-13 school year, instruction in Spanish language arts, where provided under subsection (c) or (d), shall be aligned to the standards that are appropriate to the ages or grade levels of the students served, which are set forth in the document titled "World-Class Instructional Design and Assessment: Spanish Language Arts Standards" (2005), published by the Board of Regents of the University of Wisconsin System on behalf of the WIDA Consortium, University of Wisconsin-Madison, 1025 West Johnson Street, MD #23, Madison WI 53706, and posted at <a href="http://wida.us/standards/sla.aspx">http://wida.us/standards/sla.aspx</a>. No later amendments to or editions of these standards are incorporated by this Section.</p>
<p><b>Rating:</b> Partially Implemented</p> <p><b>District Response Required:</b> Yes</p>	
<p><b>Finding:</b>            Based on interviews with staff, the following is noted: Although the ESL teachers use the WIDA Can-Do descriptors in addition to the district-wide English language arts curriculum, the district does not have a district-wide scope and sequence or curriculum map for the ESL curriculum.</p>	
<p><b>DISTRICT’S FIRST RESPONSE – February 16, 2016</b></p>	
<p><b>Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit</b></p>	



**List and Attach Evidence of Implementation of the Corrective Action**

The ELL team will work with the Assistant Superintendent of Learning (Curriculum and Instruction) to create a district-wide scope and sequence or curriculum map. The expected date of completion will be June 30, 2016.

**ISBE’S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**Basis for Partial Acceptance or Non Acceptance:**

Documentation is required as evidence of implementation.

**Required Elements of Corrective Action and Progress Reports:**

In order to fully address this finding, the District must submit a detailed action plan about how it will align the District's curriculum to the relevant English language development standards for each grade level in the TBE/TPI program. Information such as detailed timeline, person(s) involved, anticipated deliverables at each completion stage, etc. should be included in the plan.

**DISTRICT’S SECOND RESPONSE – March 14, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

We will submit a detailed action plan about how we will align the District's curriculum to the relevant English language development standards for each grade level in the TBE/TPI. Information such as detailed timeline, person(s) involved, anticipated deliverables at each completion stage, etc. will be included in the plan.

**List and Attach Evidence of Implementation of the Corrective Action**

- Action plan

**ISBE’S RESPONSE TO CORRECTIVE ACTION PLAN – April 19, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**COMPONENT 7: RIGHTS OF PARENTS AND COMMUNITY ENGAGEMENT**

This component examines whether the District established and implements effective means of community engagement and that parents are fully informed of their rights.

Component Number	Legal Standard
7.2	<p><b>Progress Reports</b>  <b>23 Ill. Adm. Code 228.40 (c)(1) Maintenance of Records and Reporting Procedures (1) Report Cards -</b> <i>The school shall send progress reports to parents or legal guardians of students enrolled in programs in the same manner and with the same frequency as progress reports are sent to parents or legal guardians of other students enrolled in the school district. (A) Progress reports shall indicate the student's progress in the program and in the general program of instruction. (B) Progress reports shall indicate when the student has successfully completed requirements for transition from the program into the general program of instruction if that information has not been reported separately in writing to the parents or legal guardian. (C) Progress reports for all students enrolled in a program under this Part shall be written in English and in the student's home language unless a student's parents or legal guardian agrees in writing to waive this requirement. The parents' waiver shall be kept on file in accordance with subsection (c)(3) of this Section.</i></p>
<p><b>Rating:</b> Partially Implemented</p> <p><b>District Response Required:</b> Yes</p>	
<p><b>Finding:</b>            Based on Interviews with staff and a review of student files indicated that progress reports are written in English and Spanish but not in all the English learners' home languages and written agreements from students' parents to waive this requirement are not obtained by the District.</p>	
<p align="center"><b>DISTRICT'S FIRST RESPONSE – February 16, 2016</b></p>	
<p><b>Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit</b></p> <p>The EL Department will distribute the report card waiver to all EL families. This waiver will be translated into Mandarin, Spanish and Arabic. We will also translate the report card for any family indicating that they need translation by the end of the school year.</p>	

**List and Attach Evidence of Implementation of the Corrective Action**

**ISBE’S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**Basis for Partial Acceptance or Non Acceptance:**

Documentation is required as evidence of implementation.

**Required Elements of Corrective Action and Progress Reports:**

In order to fully address this finding, please submit procedures/protocols shared with staff and copies of the translated waiver and progress reports in the students home languages.

**DISTRICT’S SECOND RESPONSE – March 14, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

We will submit procedures/protocols shared with staff and copies of the translated waiver and progress reports in the students home languages.

**List and Attach Evidence of Implementation of the Corrective Action**

- Procedure document
- Translated Waiver
- Translated progress reports

**ISBE’S RESPONSE TO CORRECTIVE ACTION PLAN – April 19, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

Component Number	Legal Standard
7.3	<p><b>Withdrawal by Parents (Opt-out or Refusals)</b>  <b>23 Ill. Adm. Code 228.40 (a)(2) Withdrawal by Parents</b> – Any parent or legal guardian whose child has been enrolled in a program shall have the absolute right to withdraw the child from the program immediately by submitting a written notice of his or her desire to withdraw the child to the school authorities of the school in which the child is enrolled or to the school district in which the child resides. (Section 14C-4 of the School Code).</p>
<p><b>Rating:</b> Partially Implemented  <b>District Response Required:</b> Yes</p>	
<p><b>Finding:</b>  Based on a review of the District’s withdrawal notice and interviews conducted with teachers and administrators, it has been found that although the district has a system in place and a form available, the section where the parents must indicate the reason for refusal is not clearly identified.</p>	
<p><b>DISTRICT’S FIRST RESPONSE – February 16, 2016</b></p>	
<p><b>Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit</b></p> <p>The District will update the D181 withdrawal notice form, adding a section where parents indicate the reason to refuse services. This will be completed by the end of the year.</p>	
<p><b>List and Attach Evidence of Implementation of the Corrective Action</b></p>	
<p><b>ISBE’S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016</b></p>	
<p><b>Status of Corrective Action:</b>  <input type="checkbox"/> Accepted      <input checked="" type="checkbox"/> Partially Accepted      <input type="checkbox"/> Not Accepted</p>	
<p><b>Basis for Partial Acceptance or Non Acceptance:</b>  Documentation is required as evidence of implementation.</p>	

**Required Elements of Corrective Action and Progress Reports:**

In order to fully address this finding, please submit procedures/protocols shared with staff.

**DISTRICT'S SECOND RESPONSE – March 14, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

We will submit procedures for new withdrawal form.

**List and Attach Evidence of Implementation of the Corrective Action**

- Procedures for new withdrawal form
- New withdrawal form

**ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN – April 19, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**COMPONENT 8: PROGRAM EVALUATION, STUDENT RECORDS, AND DATA MANAGEMENT**

This component examines whether the District has met the accountability measures and maintained accurate student records and reporting procedures.

Component Number	Legal Standard
<p align="center"><b>8.4</b></p>	<p><b>Maintenance of Records</b>  <b>23 Ill. Adm. Code 228.15 (d)</b><i>The completed home language survey form shall be placed into the student's temporary record as defined in 23 Ill. Adm. Code 375(Student Records).</i></p> <p><b>Ill. Adm. Code 228.40 (c)(3)</b> <i>Records - School districts shall maintain records of each student enrolled in programs in the manner prescribed in 23 Ill. Adm. Code 375 (Student Records). These records shall include program entry/exit information, annual English language proficiency assessment scores and results from the prescribed screening instrument for students in kindergarten and any of grades 1 through 12 or the results from the prescribed screening procedures for students in preschool programs; other student information (e.g., language, grade level, and attendance); the rationale for a student's placement into a part-time program, where applicable, including documentation of the criteria, as set forth in Section 228.30(c)(3) of this Part, used to determine that a part-time program would be appropriate; and documentation of conferences and written communication with parents or legal guardians. Parents and legal guardians of students enrolled in programs shall have access to their students' records, as specified in 23 Ill. Adm. Code 375.</i></p>
<p><b>Rating:</b> Partially Implemented</p> <p><b>District Response Required:</b> Yes</p>	
<p><b>Findings:</b>            As evidenced by a review of student files, the district does not maintain the records of each student enrolled in a TBE/TPI program in the manner prescribed by <i>23 Ill. Adm. Code 228.15(d) and 228.40 (c)(3)</i>. The following items are inconsistently found:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Dates of the initial English language proficiency screener and scores;</li> <li><input type="checkbox"/> Parents' report card waiver.</li> </ul>	

**DISTRICT'S FIRST RESPONSE – February 16, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

The EL Coordinator will provide a checklist to the EL teachers for the screening process, adding the dates of initial screener and scores.

The EL teachers will add the report card waiver to the file of all EL students by the end of the school year.

**List and Attach Evidence of Implementation of the Corrective Action**

**ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN – March 9, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted

**Basis for Partial Acceptance or Non Acceptance:**

Documentation is required as evidence of implementation.

**Required Elements of Corrective Action and Progress Reports:**

In order to fully address this finding, please submit procedures/protocols shared with staff.

**DISTRICT'S SECOND RESPONSE – March 14, 2016**

**Description of Corrective Action (For each Correction Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) and Description of Internal Procedures for continued implementation after the ISBE visit**

We will submit procedures shared with staff.

**List and Attach Evidence of Implementation of the Corrective Action**

- Procedures for screening process including dates and scores
- Procedures for the report card waiver

**ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN – April 19, 2016**

**Status of Corrective Action:**

Accepted       Partially Accepted       Not Accepted