

### **Illinois State Board of Education**

100 West Randolph Street, Suite 14-300 • Chicago, Illinois 60601-3223 www.isbe.net

James T. Meeks Chairman Tony Smith, Ph. D. State Superintendent of Education

June 13, 2016

Mr. Forrest Claypool Chief Executive Officer City of Chicago School District 299 42 W Madison St Chicago, IL 60602

Chief Education Officer City of Chicago School District 299 42 W Madison St Chicago, IL 60602

Dr. Janice K. Jackson

Dear Mr. Claypool and Dr. Jackson:

Between January 26 and February 11, 2015 the Division of English Language Learning (DELL) of the Illinois State Board of Education conducted an on-site monitoring review of City of Chicago School District 299'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 March 26, 2015, outlining findings that required corrective actions and received City of Chicago School District 299's response on June 30, 2015. DELL issued an updated report summarizing the results of our review of your Corrective Action Plan on October 8, 2015 with a request for updated information on March 23, 2016. City of Chicago School District 299 submitted responses on January 15, 2016 and the requested follow up documentation on April 29, 2016. Upon DELL's review of these submitted documents, it is determined that the District's proposed actions 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 312-814-3850 or <a href="mailto:delmonitoring@isbe.net">delmonitoring@isbe.net</a>.

Sincerely,

Seng Naolhu

Seng Naolhu
Principal Consultant
Division of English Language Learning

Tina H. Paduck Principal Consultant

cc: Jorge Macias, Chief Officer, Office of Language and Cultural Education David González Nieto, Division Administrator

Component Number	Legal Standard	
1.1 - 1.4	Home Language Survey 23 III. Adm. Code 228.15 (a) 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 III. Adm. Code 375 (Student Records).	

Rating: Partially Implemented

**District Response Required: Yes** 

#### Findings:

Based on interviews with staff and the review of student files and other documentation from the district:

- A Home Language Survey (HLS) is not consistently administered at each attendance center to students entering the District's schools for the first time.
- The HLS is not consistently administered in all the English learners' home languages, when feasible; the HLS used most frequently includes translations in eight top languages only.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

A Home Language Survey (HLS) will be consistently administered at each attendance center to students entering the District's schools for the first time. The HLS will be consistently administered in all the English learners' home languages.

- Compliance Specialist for the Office of Language and Cultural Education (OLCE), Hanan Matari, and Saira Riaz, Data Analyst, in conjunction with Debra Price, Manager from the Department of Information & Technology Services (ITS) will create a webinar for K-12 on HLS for District clerks during the enrollment/registration process by the end of August 2015
- 2. OLCE Data Analyst, Saira Riaz, will create a tutorial to ensure school clerk accountability for content of webinar
- 3. School clerks will scan a copy of the original HLS into the student profile upon enrollment/registration and place the original HLS into cumulative folder
- 4. Christopher Rosean and Pat Fassos of the Office of Early Childhood Education (OECE) will create a webinar on HLS for district PE/PK teachers and school clerks in multiple languages during the enrollment/registration process by the end of August 2015
- 5. OLCE Specialists will provide school clerks and EL Program Teachers (ELPTs) with list of all 41 languages in which the HLS is available on the ISBE website and provide it to clerks and ELPTs

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. OLCE Compliance Specialist Hanan Matari and Data Analyst Saira Riaz will provide meeting agenda with Debra Price, Manager from ITS by end of August 2015
- 2. OLCE Data Analyst, Saira Riaz, will provide the links to the webinars that are created for clerks and teachers by Christopher Rosean and Pat Fassos from OECE by end of August 2015

#### Description of Internal Procedures for continued implementation after the ISBE visit

- OLCE Compliance Specialist Hanan Matari and Data Analyst Saira Riaz will meet with Debra Price from ITS to create webinar and revision of the Registration, Enrollment, and Student Demographics User Guide
- 2. OLCE Early Childhood EL Instructional Specialist Jennifer Ramirez will co-present with Christopher Rosean and Pat Fassos on webinar and updates for enrollment/registration procedure for the HLS during OLCE's Principal PD on July 7, 8, 9 and 14
- 3. OLCE Data Analyst, Saira Riaz will create course code on CPS Learning Hub for school clerk tutorial and attach link to exit survey
- OLCE Specialists will create questions for exit survey to ensure completion and accuracy of answers
- 5. OLCE Data Analyst, Saira Riaz will compile data on survey completion and provide it to OLCE EL Network Specialists to follow up during school visits on an on-going basis
- 6. OLCE EL Network Specialists provide technical assistance to school clerks based on the data from exit survey as necessary

# ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard
1.5	Prescribed Screening Procedures for Preschool 23 III. Adm. Code 228.10 "Prescribed Screening Procedures" means the procedures that a school district determines to be appropriate to assess a preschool student's level of English language proficiency, (minimally in the domains of speaking and listening), in order to determine whether the student is eligible to receive bilingual education services. The procedures may include, without limitation, established screening instruments or other procedures, provided that they are research-based. Further, screening procedures shall at least: Be age and developmentally appropriate; Be culturally and linguistically appropriate for the children being screened; Include one or more observations using culturally and linguistically appropriate tools; Use multiple measures and methods (e.g., home language assessments; verbal and nonverbal procedures; various activities, settings, and personal interactions); Involve family by seeking information and insight to help guide the screening process without involving them in the formal assessment or interpretation of results; and Involve staff who are knowledgeable about preschool education, child development, and first and second language acquisition.

Rating: Partially Implemented

**District Response Required:** Yes

#### Finding:

Based on interviews with staff and the review of student files and other documentation from the district:

Not all the attendance centers use preschool screening procedures that meet the minimum requirements set forth in 23 III. Adm. Code 228.10.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

 Representatives from the Office of Language and Cultural Education (OLCE) and the Office of Early Childhood Education (OECE) will co-present at the annual principals' training seminar this summer to inform principals of the preschool screening procedures and the screening requirements set forth in 23 Illinois Administrative Code 228.10.

- 2. OLCE and OECE will hold training sessions in the fall of 2015 for preschool teachers, preschool managers, and school administrators in regards to the laws and codes that govern the education of English Learners.
- 3. OECE will provide a webinar for preschool teachers, which outlines the registration process (including completion of the HLS and screening procedures) for preschool students, which will be distributed to all preschool teachers through the weekly Preschool Email Blast. The webinar provides links to the Illinois State Board of Education Department of English Language Learning Forms and Notifications section where preschool teachers can obtain the HLS and other required forms in a variety of languages.
- 4. For the 2015-16 school year, data on preschool students to be screened will be pulled by OECE 30 days after the first day of school and then at the end of November 2015, January 2016, and March 2016, and once again in mid-May 2016. This information will be sorted by Network and forwarded to preschool managers and Network personnel.
- 5. OLCE Specialists will support Networks and preschool managers in assuring that all preschool students who require screening are screened in a timely manner through school visit forms and data collection.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Webinar created by OECE to be shared with preschool teachers
- 2. Planning meeting agenda for the upcoming Principals' Training OECE/OLCE session
- 3. OLCE organizational chart for SY16
- 4. OLCE School Visit Form (Compliance Visit)

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE is restructuring and will have an EL Compliance Specialist and an EL Instructional Specialist assigned to early childhood. This individual will work closely with the Office of Early Childhood Education (OECE) on the intake, screening, placement, and transition process as well as professional development around working with English Learners.
- 2. With the restructuring, there will be 10 EL Network Specialists and 2 EL Compliance Specialists who will work with the Office of Network Supports (ONS) and the Networks themselves to ensure that Networks include ELs in their PD plans, that preschool classrooms are staffed with an appropriately-endorsed preschool teacher, and that intake, screening, placement, and transition protocols are followed in all CPS preschool programs.

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### Status of Corrective Action:

□Accepted □ Partially Accepted □ Not Accepted

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

Additional evidences needed.

#### **Required Elements of Corrective Action and Progress Report:**

Provide evidences of the following:

- Agenda for the Principals' Training and sign-in sheet; and,
- Agenda for the training sessions on the bilingual education's rules and regulation were offered to
  preschool teachers, school managers and school administrators. Please attach copies of sign-in
  sheets training agenda and any applicable training materials.

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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 CPS Office of Early Childhood Education (ECE), in collaboration with OLCE, have presented to

teachers, principals, and directors on the identification, screening, and placement process for English Learners enrolling in Pre K. OLCE has 1 ECE Instructional Specialist who collaborates with ECE and 10 EL Network Specialists that monitor Pre K programs across the district.

ECE, in collaboration with OLCE, presented in April, September, and December 2015 to teachers, principal, and directors of Pre K programs regarding the identification, screening and placement of ELs.

#### List and Attach Evidence of Implementation of the Corrective Action:

- Agenda and presentations from April, September, and December 2015 meetings.
- ECE Pre School Handbook 2015-16.
- OLCE Organizational Chart.
- A copy of an Assessment update from the Week of 9-7-15.
- EL Program monitoring forms utilized by EL Network Specialists to monitor schools.

#### May 2, 2016 Update:

OLCE Organizational Chart.

### ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: ⊠Accepted □ Partially Accepted □Not Accepted

Component Number	Legal Standard	
1.6	Screening for Program Eligibility for Grades preK to 12 23 III. Adm. Code 228.15 (e) The district shall screen the English language proficiency of each student identified through the home language survey as having a language background other than English by using the prescribed screening instrument applicable to the student's grade level (i.e., kindergarten or any of grades 1 through 12) as set forth in Section 228.10, or the prescribed screening procedures identified by the preschool program. This screening shall take place within 30 days either after the student's enrollment in the district or, for preschool programs, after the student commences participation in the program, for the purpose of determining the student's eligibility for bilingual education services and, if eligible, the appropriate placement for the student. For kindergarten, all students identified through the home language survey, including students previously screened when enrolled in preschool, must be screened using the prescribed screening instrument for kindergarten.	

Rating: Partially Implemented

District Response Required: Yes

#### Findings:

Based on interviews with staff and the review of student files and other documentation from the district:

- The District's procedures for screening the English language proficiency of every student in preschool, kindergarten, or any of grades 1 through 12, who was identified through the home language survey (HLS) as having a language background other than English are not consistently followed by each attendance center.
- Students who score below the state defined minimum for English language proficiency on the prescribed assessment and are eligible for services are not consistently placed into a TBE/TPI program to receive language support services across all the attendance centers in the district.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

The District's procedures for identifying students in preschool through 12<sup>th</sup> grade will be consistently followed by each attendance center and placed into TBE/TPI programs to receive language support services across all the district's attendance centers and implemented accordingly:

- OLCE Compliance Specialist Hanan Matari and Data Analyst, Saira Riaz, will provide all OLCE EL Network Specialists with data on students that need screener within the 30 days after enrollment beginning SY 2015-16
- 2. OLCE EL Network Specialists will collaborate with Network Instructional Support Leaders (ISLs) and English Learner Program Teachers (ELPTs) to notify them and ensure that students that need to be screened are screened within the 30 days and 14 days for enrollment thereafter
- OLCE EL Network Specialists will collaborate with Network ISLs to visit schools to monitor screening
- 4. OLCE EL Network Specialists will visit schools to ensure proper placement of ELs
- 5. OLCE Compliance Specialists and EL Network Specialists will report monitoring data on students to be screened and placed appropriately into TBE/TPI programs to Network Chiefs on an ongoing basis

List of Attached Evidence of Completion of the Corrective Action (if applicable)

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE Compliance Specialist Hanan Matari and Data Analyst, Saira Riaz, will continue to provide data to OLCE EL Network Specialists on students that need to be screened
- 2. OLCE EL Network Specialists will conduct school visits to monitor screening and provide technical assistance to new ELPTs with screening
- OLCE EL Network Specialists will monitor appropriate placement of students by conducting school visits
- 4. OLCE EL Network Specialists will continue to collaborate with ELPTs and Network ISLs to ensure screening of students

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### **Status of Corrective Action:**

□ Accepted □ Partially Accepted □ Not Accepted

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

An update is necessary.

#### **Required Elements of Corrective Action and Progress Report:**

Provide the following updates:

- Samples of letters or memorandum that were sent to OLCE EL Network Specialists informing which students need to be screened in 2015-16 school year.
- List of school visited at the beginning of the 2015-16 school year to ensure proper screening and placement of ELs.

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

Office of Assessment sends weekly updates to all schools: one of the items they send reminders about are deadlines related to screening students for English language proficiency.

OLCE's Data Analyst provides periodic updates to OLCE Network Specialists about their assigned

networks and schools that have students who need to be screened for English language proficiency. OLCE Network Specialists then share follow-up communication with their assigned networks (chiefs, groups of principals, or principals).

Compliance reviews at schools focus on screening of students as one of the components of the audits.

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

- A copy of an Assessment update from the Week of 9-7-15
- EL Program monitoring forms utilized by EL Network Specialists to monitor schools
- See attached copies of emails (1-10) for samples of emails about screening students.
- See the attached copy of the Compliance Review (relevant sections highlighted)
- A list of schools visits through early January 2016.
- See a sample of completed Compliance Reviews from various schools.

#### May 2, 2016 Update:

A list of schools visited in the 2015-2016 school year.

### ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: ⊠Accepted □ Partially Accepted □Not Accepted

Component Number	Legal Standard
2.1	Annual English Language Proficiency Assessment 23 III. Adm. Code 228.25 (b)(1) 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.

Rating: Partially Implemented

District Response Required: Yes

#### Finding:

Based on the review of reports from the Illinois Student Information System (SIS):

• 1143 out of 58,188 ELs did not take the annual assessment for English language proficiency in 2014.

#### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

Annual Assessment for Language Proficiency will be computer- based (administered electronically) in 2016. OLCE will collaborate with Linda Abdul, Department of Student Assessment (DoSA) to:

- 1. Informal all principals of the upcoming changes to ACCESS July 7-14- Principal Institute
- 2. Ensure that schools assess all eligible ELs, by providing lists of students to be tested- DoSA and OLCE
- 3. Create ACCESS 2.0 webinars and in-services, by Oct. pending information provided by WIDA
- 4. Provide training for administering the annual assessment etc. webinars.
- 5. Discuss with vendor the availability of the New Assessment Reporting as a monitoring tool.
- 6. Create a Google survey for schools to report weekly on testing progress by Oct. 2015.
- 7. Create procedures to monitor schools annual assessment implementation during ACCESS Window

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Assessment Calendar Assessment weekly updates. Will be available internally through Knowledge Center.
- 2. Webinars, training materials: in-service sign in and PowerPoint, will be provided by Nov.
- 3. Procedures for testing administration presentation, reports provided to schools with eligible ELs with participation requirements.
- 4. Reports of ACCESS-K MODEL certified teachers will be shared with schools.

#### Description of Internal Procedures for continued implementation after the ISBE visit

In collaboration with Linda Abdul of DoSA, OLCE will-

- 1. Develop district wide communication plan by 8/2015.
- 2. Provide ACCESS 2.0 training for teachers and eligible participants by Dec. 2015
- 3. OLCE Network Specialists will monitor number of ELs tested during the testing window through the survey.
- 4. OLCE Network Specialists will conduct school visits to ensure the security and accuracy of implantation. Jan. 15 Feb. 16, 2015.

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### Status of Corrective Action:

□Accepted □Not Accepted □Not Accepted

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

Report on SIS of the 2015 annual assessment of the EL students English language proficiency indicates that a much higher rate of EL students were not administered the ACCESS for ELLs in 2015. The rate increases from 1.9% to 3.6%.

#### Required Elements of Corrective Action and Progress Report:

Please provide the following updates:

- Annual assessment of ELs' English language proficiency plan scheduled to be completed on August, 2015.
- Process or procedures that district will put in place to ensure that all ELs are annually administered Access for ELLs.

#### DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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 Department of Student Assessment collaborates biweekly with OLCE to plan administration and communication to schools regarding Access testing for English Learners. OLCE and Student Assessment present to EL Program Teachers in all schools and networks in the Fall of each year.

Department of Student Assessment and OLCE monitor the number of teachers certified to administer the assessment at each school and communicate with principals when additional staff needs to become certified. OLCE and Student Assessment prepare reports of students to be tested and they are distributed to schools via IMPACT SIM (CPS student information system)

The Department of Student Assessment publishes a weekly memo with updates on all assessments administered in the district, including ACCESS.

OLCE conducted overview sessions about planning and training for the administration of ACCESS 2.0 across various networks in the district. Those sessions included information about which students need to be screened (i.e. even students whose parents refused services, etc.)

Information about ACCESS administration, teacher certification, planning, etc. is addressed by OLCE Network Specialists when they conduct audit visits at schools.

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

- A Sample memo sent to all schools from the Office of Student Assessment with planning updates about ACCESS
- A copy of the presentation created by the Office of Student Assessment about ACCESS planning, preparation and training (12 sessions presented district-wide).
- A sample of communication from the OLCE Network Specialists about the district-wide ACCESS presentation (see above) as well as repeat sessions presented by OLCE at each network
- A copy of the Compliance Review (relevant sections highlighted) form used for school audits.
- See the attached sample of completed Compliance Reviews from various schools.

ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016				
Status of Corrective Action:				
⊠Accepted	□ Partially Accepted	□Not Accepted		

Legal Standard
Individualized Educational Plan (IEP) Teams for EL students 23 III. Adm. Code 226.210 (e) 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.

Rating: Partially Implemented

**District Response Required**: Yes

#### Findings:

Based on interviews with staff and the review of student files:

- A qualified bilingual specialist does not consistently participate on the Individual Education Plan (IEP) teams of English learners being evaluated for special education services in order to assist the other participants in understanding the student's language or cultural factors as they relate to the student's instructional needs in all the attendance centers across the district.
- Individuals serving as the bilingual specialist do not consistently indicate their role on the IEP team sign-in sheet.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

In collaboration with Office of Diverse Learning Support and Services (ODLSS).

- 1. Officers of ODLSS and OLCE will meet quarterly to discuss the progress and on this goal.
- Related Service Providers (Network special ed. Specialist) will review all IEPs for evidence of participation of Bilingual/ESL Specialist in IEP meetings. For all IEPs of EL students where a Bilingual/ESL Specialist did not participate, these IEPs will be revised to include the Bilingual/ESL Specialist and their feedback on all sections of the IEP that pertains to the EL (completed by Dec. 2015).
- 3. A memorandum communicating the need to include a Bilingual specialist in every IEP meeting for ELs, as well as the role of the bilingual specialist in the IEP meetings will be sent to all building administrators, case managers, related service providers, bilingual/ESL and LBS-I teachers. (Bilingual Special Education manager, completed by 06/05/15)- See attached.
- 4. Regular monitoring of IEP meetings for ELs by ODLSS will be ongoing, in order to provide targeted support to IEP teams not following mandate. (Bilingual Special Education Manager, completed 06/2016)
- 5. Training on IEPs for ELs with disabilities, will be provided to case managers, English Learner Program teachers, related service providers, Bilingual/ESL and LBS I teachers starting summer 2015 and continue throughout the year. (Bilingual Special Education team, completed by 6/2016)
- 6. ODLSS ----- in collaboration with OLCE ---- will explore solutions within the existing eIEP system to more thoroughly accommodate participation of the bilingual specialist based on an EL indicator from Student Information Management (SIM). Such feature will prevent IEPs from being finalized without the participation of the Bilingual specialist. (Bilingual Special Education and Bilingual Specialists and IMPACT team, completed by 12/2015)

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Bilingual Special ed. manual & memos.
- 2. Monthly counts of IEP meetings held without a Bilingual Specialist Data of IEPs without a Bilingual Specialist present at the IEP meeting.
- Copies of Emails addressing this concern and school action plans to address this need.
- 4. PDs provided & sign in sheets of trainings
- 5. Meeting agendas actual launching of updated eIEP in SSM (Data System where eIEP is found).

#### Description of Internal Procedures for continued implementation after the ISBE visit

- Monitoring after implementation:
   OLCE will collaborate with the Bilingual Special Ed Manager to monitor the corrective actions.
- 2. ODLSS Bilingual Special Ed. Manager will conduct quarterly audits of IEPs for ELs to monitor and send follow up communications/directives. ODLSS Data analyst will provide monthly reports to Bilingual Special Education manager.
- 3. Bilingual Special Ed manager and team with OLCE will provide quarterly professional development to targeted stakeholders, based on data analysis.
- 4. ODLSS- Bilingual Special Ed. Manager, will train all case managers on the eIEP updates and features pertaining to ELs by 9/2015.
- 5. OLCE specialists will visit schools to review ELs with IEPs records and check on bilingual specialist participation.

ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015			
Status of Correcti	ve Action:		
⊠Accepted	☐ Partially Accepted	□Not Accepted	

Component Number	Legal Standard
2.3	Student Assessment for Program Exit 23 III. Adm. Code 228.25 (2)The State Superintendent shall determine and post on the State Board's website no later than September 1, 2010 the composite score and the literacy score that will be used to determine whether a student is identified as "proficient". Should the minimum scores be modified, the State Superintendent shall inform school districts no later than July 1 of the scores to be used and modify the State Board's website accordingly. (A) Each student whose score on the English language proficiency assessment is identified as "proficient" shall exit the program of bilingual education services, subject to the provisions of Section 14C-3 of the School Code [105 ILCS 5/14C-3]. B) Each student whose score is identified as "proficient" in accordance with subsection (b)(2)(A) of this Section shall no longer be identified as an English learner.

Rating: Partially Implemented

District Response Required: Yes

#### Finding:

Based on interviews with staff and the review of student files:

• In some cases, students are exited from the TBE/TPI program services prior to achieving English language proficiency.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. Office of Network Support and OLCE-Reinforce the CPS policy -inform Networks and schools of the current processes and procedures SY 2015-2016.
- 2. OLCE Chief will send a communication memorandum informing schools' administrators and network chiefs of State Administrative Rules and CPS Bilingual Education Policy regarding exiting EL students from TBE/TPI programs before meeting the exit proficiency criteria prescribed by the state (July 2015).
- 3. Data analyst, Saira Riaz and Compliance Specialist, Hanan Matari will provide weekly reports to EL Network Specialists to monitor schools who exit students from program without meeting criteria. These cases will be referred to Network Chiefs for remediation,
- 4. Evaluate the implementation of required TBE/TPI programs at all schools and identify which schools are exiting students prior to achieving language proficiency. Schools will be engaged by Network and OLCE to remediate early exit of students (August 2015)
- 5. Utilize student data systems to identify students and schools July 2015.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Memos to school Principals and Network Chiefs about CPS bilingual education policy.
- 2. Principals training power points and attendance sheets
- 3. Re-enrollment records.
- 4. Re-evaluation of program implementation.
- 5. Monitoring tools filled out by EL Program Teachers in each building

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. Office of Network Support and OLCE will train Network Chiefs in CPS Policy regarding ELs
- 2. Under the supervision of the OLCE Compliance Manager, OLCE Specialists will collaborate with network ISLs to monitor targeted schools for program implementation by Oct. 2015
- 3. OLCE specialist will visit schools and conduct program implementations reviews using the

program implementation tool created by OLCE. By December 20, each OLCE Specialist will complete visiting 90% of their Network's schools that are exiting students before meeting the requirements to ensure that students are receiving services. Copies of the site visit reports will be provided to Network Chiefs and the Legal Department.

4. In collaboration with Office of Teaching and Learning and Office of Network Supports, OLCE will reinforce the policy and report the schools that are exiting students without meeting the requirements to network chiefs by the end of first semester.

# ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015 Status of Corrective Action: □Accepted □ Partially Accepted □ Not Accepted Basis for Partial Acceptance or Non Acceptance: Evidences needed

#### **Required Elements of Corrective Action and Progress Report:**

Please provide the following evidence:

- Memos to school Principals and Network Chiefs about CPS bilingual education policy;
- Principals training power points and attendance sheets;
- Re-enrollment records;
- Re-evaluation of program implementation; and,
- Samples of monitoring tools filled out by EL Program Teachers at the building level.

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

OLCE Chief Officer and EL Network Specialists presented to CPS Principals and Administrators at the EL Principal Institute July 7-9.

OLCE provided sessions at the institute that specifically reviewed the state and federal requirements for the transition of English Learners, including ACCESS criteria for transition.

OLCE has a draft revision to current CPS Bilingual Education Policy, which includes information regarding serving students until they meet English proficiency according to state criteria.

During school audits in 2015-2016, OLCE Network Specialists review lists of all students eligible for services, regardless of year in the program. The audit includes an analysis of whether all those students are properly placed and if they are receiving appropriate services.

#### May 2, 2016 Update:

The Chicago Board of Education passed the Bilingual Education Policy on March 23, 2016.

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

- PowerPoints, Handouts, Program Booklet, and Sign-In Sheets for the OLCE EL Principal Institute titled Quality Instruction for English Learners held July 7-9, 2015
- See a copy of the Compliance Review form with relevant sections highlighted (due to the update
  to this process the re-enrollment records and re-evaluation mentioned in the previous response
  are no longer relevant)
- See the attached sample of completed Compliance Reviews from various schools.
- Draft of policy revision to be presented at the March 2016 Chicago Board of Education Meeting May 2, 2016 Update:
  - Copy of the new Bilingual Education Policy

ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016			
Status of Corrective Action:			
⊠Accepted	□ Partially Accepted	□Not Accepted	

Component Number	Legal Standard	
2.5	Monitoring Performance after Exit 20 USC 6841 (a) IN GENERAL - Each eligible entity that receives a subgrant from a State educational agency under subpart 1 shall provide such agency, at the conclusion of every second fiscal year during which the subgrant is received, with an evaluation, in a form prescribed by the agency, that includes—(4) a description of the progress made by children in meeting challenging State academic content and student academic achievement standards for each of the 2 years after such children are no longer receiving services under this part.	
Rating: Partially Implemented		
District Respon	nse Required: No	

#### Finding:

Based on interviews with staff and the review of student files and other documentation from the district:

 There are inconsistent procedures across attendance centers regarding monitoring progress of students who have exited the TBE/TPI program for two years after they transition into the general education program.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

In order to institute consistent procedures across attendance centers regarding the progress monitoring of Transitioned ELs (T1/T2), the district (OLCE)

- 1. Office of Network Supports and OLCE will inform Network Chiefs in July of procedures.
- 2. OLCE Specialists created progress monitoring tool and guidance for use
- 3. OLCE Chief and Deputy will distribute progress monitoring tool with guidance for use to Principal's in July's training
- OLCE Specialist will post the progress monitoring tool and guidance for use on the CPS Knowledge Center – Language and Culture site
- 5. OLCE Specialist will distribute with guidance for use to English Learner Program Teachers (ELPTs) via email attachment prior to first week of new school year 15-16
- 6. All school ELPTs or principal designated staff will implement the new process beginning with school year 15-16

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Progress monitoring tool
- 2. Guidance for use

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE Network Specialists provide technical assistance as needed to ensure a robust process.
- 2. OLCE Network Specialists will monitor implementation of process during school visits.

	·	•			
ISB	BE'S RESPONSE TO CORF	RECTIVE ACTION	PLAN-O	ctober 8, 201	5
Status of Correct	ive Action:				
⊠Accepted	□ Partially Accepted	□Not Accepted			

Component Number	Legal Standard
3.1	TBE Program Establishment (Preschool) 23 III. Adm. Code 228.25 (a)(3) When a preschool program of the school district has an enrollment of 20 or more English learners of any single language classification other than English in an attendance center or a non-school based facility, the school district shall establish a TBE program for each language classification represented by the students. If the preschool program of an attendance center or non-school-based facility has 19 or fewer English learners of any single language classification other than English, then the school district shall meet the requirements of subsection (a)(2) of this Section when determining placement and the program to be provided.

Rating: Partially Implemented

**District Response Required**: Yes

#### Finding:

Based on interviews with staff and the review of other documentation from the district:

• A Transitional Bilingual Education (TBE) program is not established for each language classification that has an enrollment of 20 or more students in preschool at all the attendance centers that are required to have a TBE preschool program.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

#### Immediate Steps:

- 1. The Office of Language and Cultural Education (OLCE) sent a letter in June 2015 to each school with ELs that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year.
- 2. OLCE will work with the Office of Network Support (ONS), Network Chiefs, and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter.
- 3. OLCE is working with Budget to allocate positions to schools with ELs in the following manner:
  - a. 0.5 supplemental position will be awarded using TBE/TPI funds to schools with 20-249 FLs
  - b. 1.0 supplemental position will be awarded using a combination of TBE/TPI and Title III funds to schools with 250+ ELs to be used as a 0.5 instructional and a 0.5 coaching/professional development position.
- OLCE will collaborate with ONS to ensure that all schools with ELs include ELs in their PD plan, and to ensure that administrators understand the rules and requirements around preschool TBE Programs.

#### Long-Term Steps:

- 1. OLCE and the Office of Early Childhood Education (OECE), in partnership with Gateways, are providing scholarship cohorts to assist current preschool teachers with obtaining their ESL and/or Bilingual endorsements. During SY13, 139 preschool teachers (both school-based and Community Partner Programs) were awarded the scholarship and just recently completed their endorsement courses. 31 additional preschool teachers began the scholarship cohort process in the 2014-15 school year with completion projected in June 2016.
- 2. CPS and OECE conducted job fairs, college fairs, and recruitment efforts in January 2014, December 2014, February-March 2015, and will conduct another in June-August 2015 to recruit new preschool teachers with endorsements.
- 3. OLCE and OECE will offer cohorts for bilingual paraprofessionals to earn their Early Childhood Education teaching licenses and become teachers in our TBE or TPI Programs.

- 4. The District has plans to recruit current CPS students who are candidates for the State Seal of Biliteracy to Career and Technical Education Early Childhood Programs that would offer a pipeline from being a bilingual student in CPS to becoming a teacher in TBE or TPI preschool programs.
- 5. The District has plans to explore opportunities for bilingual candidates with a Bachelor's degree to earn Alternative Licensure for Early Childhood Education with a bilingual endorsement and to then serve in TBE or TPI preschool programs.
- 6. OLCE, OECE, and ONS, through the P-2 ISL meetings, professional development, and collaboration, will provide support to schools with preschool ELs on best practice, instructional strategies, and teaching methods for working with preschool ELs

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Sample letter from OLCE regarding the number of ESL- and/or Bilingual-Endorsed Teachers they require
- 2. Sample letter/guidance regarding the allocation of positions to schools with 20 or more ELs
- 3. Spreadsheet of teachers accepted into the OECE/OLCE endorsement cohort in SY13
- 4. OLCE organizational chart for SY16 showing the new Early Childhood EL Instructional Specialist and new EL Network Specialist roles

#### Description of Internal Procedures for continued implementation after the ISBE visit

OLCE is restructuring and will have an EL Compliance Specialist and EL Instructional Specialist assigned to early childhood. This individual will work closely with the Office of Early Childhood Education (OECE) on the intake, screening, placement, and transition process as well as professional development around working with English Learners.

With the restructuring, there will be 10 EL Network Specialists and 2 Compliance Specialists who will work with the Office of Network Supports (ONS) and the Networks themselves to ensure that Networks include ELs in their PD plans, that preschool classrooms are staffed with an appropriately-endorsed preschool teacher, and that intake, screening, placement, and transition protocols are followed in all CPS preschool programs.

OLCE, OECE, and ONS, through the P-2 Instructional Support Leader (ISL) meetings that take place every 6 weeks, professional development, and collaboration, will provide support to schools with preschool ELs on best practice, instructional strategies, and teaching methods for working with preschool ELs.

ISE	BE'S RESPONSE TO COR	RECTIVE ACTION PLAN—October 8, 2015
Status of Corrective Action:		
□Accepted	☑ Partially Accepted	□Not Accepted
Basis for Partial Acceptance or Non Acceptance: An update is necessary.		

#### Required Elements of Corrective Action and Progress Report:

Please provide the following updates:

- 1) Outcome of the short term steps listed above;
- 2) Update on the long term steps listed above;
- 3) Update on the hiring of the new staff;
- 4) Collaboration protocol for OLCE and OECE; and,
- 5) Evidence that all necessary TBE programs have been established at the preschool level (such as class list with assigned teacher(s) and endorsement information).

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

#### OLCE and ECE has completed all of the following immediate steps:

- 1. The Office of Language and Cultural Education (OLCE) sent a letter in June 2015 to each school with ELs that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year.
- 2. OLCE will work with the Office of Network Support (ONS), Network Chiefs, and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter.
- 3. OLCE is working with Budget to allocate positions to schools with ELs in the following manner:
  - a. 0.5 supplemental position will be awarded using TBE/TPI funds to schools with 20-249 ELs
  - b. 1.0 supplemental position will be awarded using a combination of TBE/TPI and Title III funds to schools with 250+ ELs to be used as a 0.5 instructional and a 0.5 coaching/professional development position.
- 4. OLCE will collaborate with ONS to ensure that all schools with ELs include ELs in their PD plan, and to ensure that administrators understand the rules and requirements around preschool TBE Programs

#### OLCE has started the following long term steps:

- 1. OLCE, OECE, and ONS, through the P-2 ISL meetings, professional development, and collaboration, will provide support to schools with preschool ELs on best practice, instructional strategies, and teaching methods for working with preschool ELs
- 2. OLCE and the Office of Early Childhood Education (OECE), in partnership with Gateways, are providing scholarship cohorts to assist current preschool teachers with obtaining their ESL and/or Bilingual endorsements. During SY13, 139 preschool teachers (both school-based and Community Partner Programs) were awarded the scholarship and just recently completed their endorsement courses. 31 additional preschool teachers began the scholarship cohort process in the 2014-15 school year with completion projected in June 2016.
- CPS and OECE conducted job fairs, college fairs, and recruitment efforts in 2015, and will conduct additional job fairs this Spring 2016 to recruit new preschool teachers with endorsements.
- 4. OLCE and OECE will offer cohorts for bilingual paraprofessionals to earn their Early Childhood Education teaching licenses and become teachers in our TBE or TPI Programs.
- 5. The District has plans to recruit current CPS students who are candidates for the State Seal of Biliteracy to Career and Technical Education Early Childhood Programs that would offer a pipeline from being a bilingual student in CPS to becoming a teacher in TBE or TPI preschool programs.
- 6. The District has plans to explore opportunities for bilingual candidates with a Bachelor's degree to earn Alternative Licensure for Early Childhood Education with a bilingual endorsement and to then serve in TBE or TPI preschool programs.

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

- Evidence of Office of Language and Cultural Education (OLCE) and Office of Early Childhood Education (OECE) Collaboration - 3 PowerPoint presentations (2 from an OLCE Professional Development (PD) and 1 from an OECE PD in which OLCE and OECE collaborated to create the presentations and present them to teachers
- Agendas from the P-2 Instructional Support Leader (ISL) meetings held by OECE at which OLCE sends a representative (Jennifer Ramirez) to participate in the dialogue and collaboration around English Learner (EL) matters
- Agendas and the Early Literacy Action Plan Document from the P-2 Cross-Departmental Collaboration Meetings that bring OECE, OLCE, Office of Diverse Learner Supports and Services (ODLSS- Special Ed), Health and Wellness, Social-Emotional Learning, and all Content areas (Math, Science, Literacy, Social Science, Arts, PE) together to collaborate on P-2 instruction, PD, and guidance

- Spreadsheets with current teacher staffing for Pre K schools
- See a sample of completed Compliance Reviews from various schools. Sample includes elementary schools (including preK programs) and high schools, charters, schools from different geographic areas in the district, as well as schools that serve English learners from various language backgrounds
- OLCE Organizational Chart

#### May 2, 2016 Update:

OLCE Organizational Chart

ISBE'	S RESPONSE TO UPDATE	ED CORRECTIVE ACTION PLAN – 5/27/2016
Status of Corrective Action:		
⊠Accepted	□ Partially Accepted	□Not Accepted

Component Number	Legal Standard
3.2	TBE Program Establishment (K-12) 23 III. Adm. Code 228.25 (a)(1) When an attendance center has an enrollment of 20 or more English learners of the same language classification the school district must establish a transitional bilingual education (TBE) program for each language classification represented by those students. (Section 14C-3 of the School Code; see Section 228.30(c) of this Part) A further assessment of those students to determine their specific programmatic needs or for placement in either a full-time or a part-time program may be conducted. This subsection (a)(1) applies only to students enrolled in kindergarten or any of grades 1 through 12 in an attendance center.

Rating: Partially Implemented

**District Response Required**: Yes

#### Finding:

Based on interviews with staff and the review of other documentation from the district:

 A Transitional Bilingual Education (TBE) program is not consistently established for each language classification that has an enrollment of 20 or more students at all the attendance centers that are required to have a TBE program.

#### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

#### Immediate Steps:

- 1. The Office of Language and Cultural Education (OLCE) sent a letter in June 2015 to each school with ELs that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year.
- 2. OLCE will work with the Office of Network Support (ONS), Network Chiefs, and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter.
- 3. OLCE is working with Budget to allocate positions to schools with ELs in the following manner:
  - a. 0.5 supplemental position will be awarded using TBE/TPI funds to schools with 20-249
  - b. 1.0 supplemental position will be awarded using a combination of TBE/TPI and Title III funds to schools with 250+ ELs to be used as a 0.5 instructional and a 0.5 coaching/professional development position.
- 4. OLCE will collaborate with ONS to ensure that all schools with ELs include ELs in their PD plan,

and to ensure that administrators understand the rules and requirements around TBE Programs.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- Sample letter from OLCE regarding the number of ESL- and/or Bilingual-Endorsed Teachers they
  require
- 2. Sample letter/guidance regarding the allocation of positions to schools with 20 or more ELs
- 3. Spreadsheet of teachers accepted into the OLCE endorsement cohort in SY15
- 4. OLCE organizational chart for SY16 showing the new EL Instructional Specialist and new EL Network Specialist roles

#### Description of Internal Procedures for continued implementation after the ISBE visit

OLCE is restructuring and will have EL Compliance Specialists, EL Instructional Specialists, EL Network Specialists assigned to schools across the district. These individuals will work closely with the Office of Network Supports (ONS) and schools on the intake, screening, placement, and transition process as well as professional development around working with English Learners.

With the restructuring, there will be 10 EL Network Specialists and 2 Compliance Specialists who will work with the Office of Network Supports (ONS) and the Networks themselves to ensure that Networks include ELs in their PD plans, that preschool classrooms are staffed with an appropriately-endorsed preschool teacher, and that intake, screening, placement, and transition protocols are followed in all CPS preschool programs.

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### **Status of Corrective Action:**

□Accepted ☑ Partially Accepted □Not Accepted

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

#### **Required Elements of Corrective Action and Progress Report:**

Please provide the following updates:

- 1) Outcome of the immediate steps listed above;
- 2) Update on the hiring of the new staff;
- 3) Collaboration protocol for OLCE and ONS;
- 4) 2015-2016 Professional Development plan referenced above; and,
- 5) Evidence that all necessary TBE programs have been established at the K-12 level (such as class list with assigned teacher(s) and endorsement information).

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

OLCE shared information with the CEO and with Network Chiefs in September related to the Instructional Integrity Plan and the school audits conducted as part of this initiative (please see the EL Instructional Audit document)

OLCE provided a webinar In September, 2015 to Network Chiefs and staff to present an overview of the Instructional Integrity Initiative, including nominating ELPTs for schools that serve ELs, the self-assessment tool (Quality Analysis Guide for School Bilingual Programs) to be completed by October 15, 2015, school visit planning, and next steps (please see the EL Instructional Integrity Webinar presentation).

OLCE Network Specialists started school audits in September 2015 as part of the district efforts to ensure consistency of program offerings across the district. They will be conducting follow-ups to the visits in the Spring to see whether schools implemented relevant corrective actions to address their audit findings.

OLCE shared a memo with the Chief Officer of Strategy and Planning, Network Chiefs and other administrators, delineating the ways in which the Network Chiefs can review outcomes of visits in their networks, plan and set goals for next steps. The memo also included information for ways in which the Network Chiefs could include goals for program improvement when discussing and evaluating school principals (see OLCE Memo document).

#### May 2, 2016 Update:

In March, the Office of Network Supports, sent a memo to the Network Chiefs with an explanation of the school visit follow up procedures (see EL School Visits March 16 2016 memo). Following that communication, OLCE Network Specialists sent communication to principals of each school that had received a monitoring visit and a monitoring report: the communication included a copy of a letter from the CPS Chief Education Officer, Dr. Janice Jackson, explaining the follow up procedures, as well as a copy of the EL school visits Corrective Action Response Form (see the EL Principal Letters and EL School Visits Corrective Action Response Form). On April 4, 2016, the OLCE Chief Officer, Jorge, Macias, conducted a webinar for principals and ELPTs about the follow up procedures (see attached copy of the presentation). The Corrective Action Plans are due on May 13<sup>th</sup> and will be reviewed by OLCE before final ratings are completed for the 2015-2016 school year.

For charter schools, the initial letter from the Office of Network Supports (Office of Innovation and Incubation) was sent in April and was sent directly to each Charter Network (See final Corrective Action Final Notification). The charter schools also received a copy of the letter from the CEdO and Corrective Action Response Forms, which are due at OLCE on May 20<sup>th</sup>.

#### OLCE and ECE has completed all of the following immediate steps (see Component 3.1)

- 1. The Office of Language and Cultural Education (OLCE) sent a letter in June 2015 to each school with ELS that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year.
- 2. OLCE will work with the Office of Network Support (ONS), Network Chiefs, and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter.
- 3. OLCE is working with Budget to allocate positions to schools with ELs in the following manner:
  - a. 0.5 supplemental position will be awarded using TBE/TPI funds to schools with 20-249 ELs
  - b. 1.0 supplemental position will be awarded using a combination of TBE/TPI and Title III funds to schools with 250+ ELs to be used as a 0.5 instructional and a 0.5 coaching/professional development position.
- 4. OLCE will collaborate with ONS to ensure that all schools with ELs include ELs in their PD plan, and to ensure that administrators understand the rules and requirements around preschool TBE Programs

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

- See evidence for Component 3.1
- EL Instructional Integrity Audit Memo
- EL Instructional Integrity Webinar
- List of schools audited as of early January 2016
- OLCE Memo Document
- See a sample of completed Compliance Reviews from various schools. Sample includes elementary schools (including preK programs) and high schools, charters, schools from different geographic areas in the district, as well as schools that serve English learners from various language backgrounds

#### May 2, 2016 Update:

- List of visited schools
- EL School Visits March 16 2016 memo
- EL Principal Letters
- EL School Visits Corrective Action Response Form
- EL Program Follow Up presentation.
- Final Corrective Action Final Notification

### ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: □ Partially Accepted □ Not Accepted

### Component Number Legal Standard

#### 3.3 Part-time TBE Program Eligibility and Placement

23 III. Adm. Code 228.30 (c)(3) Beginning September 1, 2013, students may be placed into a part-time program, or students previously placed in a full-time program may be placed in a part-time program in accordance with the requirements of this subsection (c)(3) and only when the placement is instructionally beneficial for the student. (A) If an assessment of the student's English language skills has been performed in accordance with the provisions of either Section 228.15(e) or Section 228.25(b) and the assessment results indicate that the student has sufficient proficiency in English to benefit from a part-time program. (i) Evidence of sufficient proficiency shall be achievement of the minimum score to be used for this purpose set by the State Superintendent either on the prescribed screening instrument required in Section 228.15(e) or the English language proficiency assessment required in Section 228.25(b). The State Superintendent shall inform districts of the minimum score to be used for the prescribed screening instrument or the English language proficiency assessment, and post the minimum score on the State Board's website. Should the minimum score be modified, the State Superintendent shall inform school districts no later than July 1 of the scores to be used and modify the State Board's website accordingly. (ii) Preschool programs shall use as evidence of sufficient proficiency either a minimum score for an established screening instrument or a minimum level of performance documented through established screening procedures. B) If the student's score either on the prescribed screening instrument required in Section 228.15(e) or the English language proficiency assessment required in Section 228.25(b) is below the minimum identified pursuant to subsection (c)(3)(A), the student may be placed in a part-time program only if one of the following conditions is met and the placement is instructionally beneficial for the student. (i) Native Language Proficiency. A native language proficiency test documents that the student has minimal or no proficiency in the home language and a parent provides written confirmation that English is the primary language spoken in the home (ii) Academic Performance in Subjects Taught in English. Any student whose student grades, teacher recommendations and State or local assessment results in the previous school year indicate that the student has performed at or above grade level in one or more core subject areas (i.e., reading, English language arts, mathematics, physical sciences, social sciences) that were taught exclusively in English (iii) Academic Performance. Any student in a departmentalized setting whose student grades, teacher recommendations and State or local assessment results in the previous school year indicate that the student has performed at or above grade level in at least two core subject areas that were taught in a U.S. school in the student's native language or via sheltered instruction in English. (iv) Students with Disabilities. Any student with a disability whose Individualized Education Program developed in accordance with 23 III. Adm. Code 226. Subpart C identifies a part-time transitional bilingual education program as the least restrictive environment for the student. (v) Limited Native Language Instruction. The use of native language instruction is permissible for a student whose native language has no written component or one for which written instructional materials are not available and cannot be developed may be limited to those components that exist in the language or to those components for which materials are available. Oral native language instruction or support should be provided based on the student's needs. School districts shall maintain evidence of their attempts to secure written instructional materials, as applicable, and present that evidence to the State Board staff upon request.(C) A part-time program shall consist of components of a full-time program that are selected for a particular student based upon an assessment of the student's educational needs. Each student's part-time program shall provide daily instruction in English and in the student's home language as determined by the student's needs.

Rating: Partially Implemented

District Response Required: Yes

#### Finding:

Based on interviews with staff and the review of student files and other documentation from the district:

• In some of the attendance centers in the district, students are placed into part-time TBE programs before their English language proficiency assessment results and other characteristics indicate that they have sufficient proficiency in English to benefit from a part-time program.

#### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. The Chief of The Office of Language of Cultural Education (OLCE) will provide communication regarding part-time eligibility of EL students enrolled in TBE Programs.
- 2. OLCE Compliance and Instructional Specialists will revise the TBE Part-Time guidance document.

3. The ACCESS and NWEA MAP assessments will be considered before Part-Time placement.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. "Rationale for Part-Time Placement" will be used for documentation of evidence that will be placed in the bilingual folder for each student.
- 2. The above form must be completed upon placing ELs in a Part-Time TBE Program.
- 3. The form will contain the student's English proficiency level and Academic performance

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE Specialists will train English Language Program Teachers (ELPTS) on proper placement of ELs in a part-time TBE program and the accurate use of the form (Rational for Part-Time TBE Placement).
- 2. OLCE Specialists will create a webinar that will be shared with principals, teachers, and Network Instructional Support Leaders.
- OLCE Specialists will conduct school visits to monitor that appropriate placement of ELs in a
  part-time TBE program and review bilingual folders to ensure the completion of the form
  described.

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### **Status of Corrective Action:**

□Accepted □ Partially Accepted

■ Not Accepted
 ■ Not Accepted
 ■ Not Accepted
 ■ Not Accepted
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#### **Basis for Partial Acceptance or Non Acceptance:**

District's response does not sufficiently address this finding.

#### Required Elements of Corrective Action and Progress Report:

The "Rationale for Part-Time Placement" form submitted does not contain all the state-established Part-Time eligibility criteria. District may find said criteria using this link: <a href="http://isbe.net/bilingual/pdfs/pt-tbe-plcmnt-criteria-228-30c3.pdf">http://isbe.net/bilingual/pdfs/pt-tbe-plcmnt-criteria-228-30c3.pdf</a>

Please submit the following evidence:

- 1) The procedure ELPTs will use to ascertain appropriate PT TBE Placement;
- 2) Updated and corrected "Rationale for Part-Time Placement" form;
- 3) Evidence of training of ELPTs regarding the use of this form;
- 4) Updated webinar referenced above; and,
- 5) Results of the school visits referenced above.

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

CPS is using ISBE's criteria for part-time placement decisions. An updated Part-time Placement Rationale form has been available to schools on the Knowledge Center since the beginning of the school year.

OLCE Network Specialists have received training on part-time placement and the form at the beginning of the school year. Subsequently, they included this information in the training for ELPTs in their assigned networks.

OLCE is in the process of finalizing updates to the Bilingual Handbook (to be used instead of the separate EL Program Teacher Resource Guide and the Principal's Guide) to provide more clear guidance on the program models used to satisfy TBE and TPI requirements and the criteria schools have to use when deciding on part-time TBE placement for individual TBE students based on their needs. The

Bilingual Handbook revisions are taking into consideration the recent release (December 9, 2015) of the excerpts from the upcoming Framing Services for English Learners in Illinois by ISBE DELL. The inclusion of Instructional Designs shared by ISBE in the Bilingual Handbook will further clarify the types of services that are appropriate for TBE students who may be eligible to receive Part-time TBE services. Expectations for required TBE/TPI services do not change for schools based on their types (i.e. IB, charter, magnet, selective enrollment, etc.). Part time eligibility is to be determined based on individual student's needs. The Bilingual Handbook, using the ISBE Framework as a resource, will have examples for ways in which Instructional Designs can look in elementary schools or middle/high schools that are departmentalized.

OLCE Network Specialists received additional training on Part-time TBE on January 15, 2016. Following the release of the Bilingual Handbook, Network Specialists will be including training on various sections of the Bilingual Handbook in their network trainings for ELPTs during Summer of 2016 and the 2016-2017 school year.

#### May 2, 2016 Update:

OLCE Network Specialists received additional training on Full-time and Part-time TBE on April 7, 2016 as a preparation for reviewing Corrective Action Plans to be submitted to OLCE from schools. Following the completion of the Bilingual Education Handbook, OLCE Network Specialists with the EL Compliance Manager will be creating presentations aligned to various sections of the Bilingual Education Handbook to be consistently used in various upcoming ELPT trainings and other OLCE presentations.

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

- A copy of a presentation to train OLCE Network Specialists in September
- A sample ELPT training presentation from 2015-2016
- A copy of the updated Part-time Placement form
- Copy of the agenda for a follow-up meeting to review ISBE's guidance on part-time placement (<a href="http://www.isbe.net/bilingual/ppt/tbe-tpi-ft-pt-components-pres010816.pdf">http://www.isbe.net/bilingual/ppt/tbe-tpi-ft-pt-components-pres010816.pdf</a>) with the OLCE Network Specialist
- See a sample of completed Compliance Reviews from various schools.

#### May 2, 2016 Update:

- Copy of the OLCE Network Specialist training from April 7, 2016
- See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)

ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN – 5/27/2016		
Status of Corrective Action:		
⊠Accepted	□ Partially Accepted	□Not Accepted

Component Number	Legal Standard
3.4	Part-time Program Components 23 III. Adm. Code 228.30 (c)(C) A part-time program shall consist of components of a full-time program that are selected for a particular student based upon an assessment of the student's educational needs. Each student's part-time program shall provide daily instruction in English and in the student's native language as determined by the student's needs.

Rating: Partially Implemented

District Response Required: Yes

#### Finding:

Based on interviews with staff and the review of student files and other documentation from the district:

• In some of the attendance centers that offer part-time TBE program services, no services are available for students in certain grade levels.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. OLCE in collaboration with the Office of Teaching and Learning will communicate that all ELs who qualify to be placed in a part-time Program continue to receive Native Language Instruction in Language Arts and Math in 3rd grade and above.
- 2. This will enable ELs to participate in the PARCC testing offered in Spanish for Math and ultimately determines Summer School placement.
- 3. OLCE Instructional Specialists and Network Instructional Support Leaders will recommend the implementation of Sheltered Instruction in Science and Social Studies in the upper grades.

List of Attached Evidence of Completion of the Corrective Action (if applicable)

#### Description of Internal Procedures for continued implementation after the ISBE visit

- OLCE Specialist will provide needed training to ELPTS and Network ISLs on identifying the appropriate Instructional Context and correctly complete the ELL Profile in IMPACT SIM (Student Data System).
- 2. OLCE Specialists will visit schools to review lesson plans and monitor the use of Native Language Support and Sheltered Instruction Strategies during instruction.
- 3. The ELL Profile will reflect the services provided to ELs placed in a Part-Time TBE Program.
- 4. The ELPTs will select the Instructional Contexts for the use of sheltered instruction. OLCE Specialist will review lesson plans and observe classrooms for sheltering strategies and Native Language Support during instruction.

IS	BE'S RESPONSE TO COR	RECTIVE ACTION PLAN—October 8, 2015
Status of Corrective Action:		
□Accepted	□ Partially Accepted	■Not Accepted
	Acceptance or Non Accept sufficiently address this fi	

#### Required Elements of Corrective Action and Progress Report:

ISBE Clarification: Use of sheltered instruction strategies does not meet the legal requirements of providing Part-Time TBE services.

Please submit a detailed plan about how Part-Time TBE services will be provided at all grade levels. Include the following information:

- 1) How a needs' assessment will be conducted for each PT TBE English learner district-wide to ascertain the level of native language instruction and/or support necessary;
- 2) How these Part-Time needs will be met at the primary, intermediate, and high school grade levels across varying types of schools (for example: IB, charter, magnet, selective enrollment, etc.); and,
- 3) The necessary training that must be provided to ELPTs and other appropriate personnel regarding these new procedures.

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

CPS is using ISBE's criteria for part-time placement decisions. Please see response to Component 3.3

OLCE is in the process of finalizing updates to the Bilingual Handbook (to be used instead of the separate EL Program Teacher Resource Guide and the Principal's Guide) to provide more clear guidance on the program models used to satisfy TBE and TPI requirements and the criteria schools have to use when deciding on part-time TBE placement for individual TBE students based on their needs. The Bilingual Handbook revisions are taking into consideration the recent release (December 9, 2015) of the excerpts from the upcoming Framing Services for English Learners in Illinois by ISBE DELL. The inclusion of Instructional Designs shared by ISBE in the Bilingual Handbook will further clarify the types of services that are appropriate for TBE students who may be eligible to receive Part-time TBE services. Expectations for required TBE/TPI services do not change for schools based on their types (i.e. IB, charter, magnet, selective enrollment, etc.). Part time eligibility is to be determined based on individual student's needs. The Bilingual Handbook, using the ISBE Framework as a resource, will have examples for ways in which Instructional Designs can look in elementary schools or middle/high schools that are departmentalized.

OLCE Network Specialists are receiving additional training on Part-time TBE on January 15, 2016. Following the release of the Bilingual Handbook, Network Specialists will be including training on various sections of the Bilingual Handbook in their network trainings for ELPTs during Summer of 2016 and the 2016-2017 school year.

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

- Draft section from the Bilingual Handbook
- Copy of the agenda for the meeting with OLCE Network Specialists.

#### May 2, 2016 Update:

- Copy of the OLCE Network Specialist training from April 7, 2016
- See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)

ISBE'	S RESPONSE TO UPDATE	ED CORRECTIVE ACTION PLAN – 5/27/2016
Status of Corrective Action:		
⊠Accepted	☐ Partially Accepted	□Not Accepted

Component Number	Legal Standard
3.5	Full-time Program Components 23 III. Adm. Code 228.30 (c) Specific Requirements for Transitional Bilingual Education (TBE) Programs (1) Each full-time TBE program shall consist of at least the following components (Section 14C-2 of the School Code): (A) Instruction in subjects which are either required by law (see 23 III. Adm. Code 1) or by the student's school district, to be given in the student's home language and in English; core subjects such as math, science and social studies must be offered in the student's home language, except as otherwise provided in subsection (c)(3); (B) Instruction in the language arts in the student's home language; (C) Instruction in English as a second language, which must align to the applicable English language development standards set forth in Section 228.10; and (D) Instruction in the history and culture of the country, territory, or geographic area which is the native land of the students or of their parents and in the history and culture of the United States.

Rating: Partially Implemented

**District Response Required**: Yes

#### Finding:

Based on interviews with staff and the review of student files and other documentation from the district, not all the programs in various attendance centers identified by the district as full-time TBE incorporate all of the required components listed below:

- Instruction in English and the home language of the student for all core subjects;
- Language Arts in the student's home language (teaching the student how to read and write in his/her home language);
- Instruction in English as a second language (ESL), which must be aligned to the Illinois English Language Proficiency Standards; and,
- Instruction in the history and culture of the native land of the student or their parents and of the United States.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. OLCE, in collaboration, with the Office of Teaching and Learning and the Office of Network Supports will continue to build capacity with the academic leadership team, Network Chiefs, principals and teachers on the TBE program structure and its required components.
- July 2015 Professional Development for school principals will address components of TBE Programs. Principals will be expected to implement TBE Programs that align to State requirements. All schools with TBE programs will be provided professional development that includes instruction for EL students in TBE Programs throughout the year during school visits if needed.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. As evidence of implementation, lesson plans will reflect Native Language Instruction and ESL that are aligned to the WIDA standards.
- 2. The Program Description documents submitted by principals who are required to implement a TBE program include the components.
- 3. Monitoring forms used by OLCE Specialists document the implementation of each component will be provided as evidence.

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE Specialist will provide professional development and training sessions to principals and ELPTs with the focus on program components and implementation.
- 2. These PDs will consist of school scenarios that will assist school principals and experts on how to structure a TBE program in their school.

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### Status of Corrective Action:

□ Accepted □ Partially Accepted ☑ Not Accepted

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

District did not submit all the aforelisted evidence documentation.

Further action is also required in order to fully address this finding.

#### **Required Elements of Corrective Action and Progress Report:**

Please submit the documentation referenced above:

- 1) A sample of the lessons plans; and,
- 2) A sample of the completed Program Description forms (only a template was submitted).

Please also submit an update regarding the continued implementation referenced above:

- 1) The PD provided to Principals and ELPTs; and,
- 2) Evidence of Principals and ELPTs attending said PD sessions.

Further action is also necessary to fully address this finding. Please submit a detailed plan about how Full-Time TBE services will be provided at all grade levels. Include the following information:

- 1) How Full-Time program will be implemented at the primary, intermediate, and high school grade levels across varying types of schools (for example: IB, charter, magnet, selective enrollment, etc.); and,
- 2) The necessary training that must be provided to ELPTs and other appropriate personnel regarding these new procedures.

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

OLCE is in the process of finalizing updates to the Bilingual Handbook (to be used instead of the separate EL Program Teacher Resource Guide and the Principal's Guide) to provide more clear guidance on the program models used to satisfy TBE and TPI requirements and the criteria schools have to use when deciding on part-time TBE placement for individual TBE students based on their needs. The Bilingual Handbook revisions are taking into consideration the recent release (December 9, 2015) of the excerpts from the upcoming Framing Services for English Learners in Illinois by ISBE DELL. The inclusion of Instructional Designs shared by ISBE in the Bilingual Handbook will further clarify the types of services that are appropriate for full-time TBE students. Expectations for required TBE/TPI services do not change for schools based on their types (i.e. IB, charter, magnet, selective enrollment, etc.). The Bilingual Handbook, using the ISBE Framework as a resource, will have examples for ways in which Instructional Designs can look in elementary schools or middle/high schools that are departmentalized. Training for ELPTs and school administrators occur throughout the year as necessary around these new procedures.

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

- Sample Unit Plan
- PD Description and Attendance
- Draft section from the Bilingual Handbook
- See samples of completed Quality Analysis Guide (used instead of the Program Description

forms mentioned in the previous response)

#### May 2, 2016 Update:

See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)

# ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: ⊠Accepted □ Partially Accepted □Not Accepted

Component Number	Legal Standard
3.6	TPI Program Establishment (Preschool) 23 III. Adm. Code 228.25 (a)(3)If the preschool program of an attendance center or non-school-based facility has 19 or fewer English learners of any single language classification other than English, the school district shall meet the requirements of subsection (a)(2) of this Section when determining placement and the program to be provided.

Rating: Partially Implemented

District Response Required: Yes

#### Finding:

Based on interviews with staff and the review of other documentation from the district:

 A Transitional Program of Instruction (TPI) is not established for language classifications with an enrollment of 19 or fewer students in preschool at all the attendance centers that are required to have at least a TPI preschool program.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

#### Immediate Steps:

- 1. The Office of Language and Cultural Education (OLCE) sent a letter in April 2015 to each school with ELs that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year.
- 2. OLCE will work with the Office of Network Support (ONS), Network Chiefs, and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter, at a minimum.
- 3. OLCE is working with Budget to allocate positions to schools with ELs in the following manner:
  - a. 0.5 supplemental position will be awarded using TBE/TPI funds to schools with 20-249 ELs
  - b. 1.0 supplemental position will be awarded using a combination of TBE/TPI and Title III funds to schools with 250+ ELs to be used as a 0.5 instructional and a 0.5 coaching/professional development position.
- 4. OLCE will collaborate with ONS to ensure that all schools with ELs include ELs in their PD plan, and to ensure that administrators understand the rules and requirements around preschool TPI Programs.

#### Long-Term Steps:

OLCE and the Office of Early Childhood Education (OECE), in partnership with Gateways, are
providing scholarship cohorts to assist current preschool teachers with obtaining their ESL and/or
Bilingual endorsements. During SY13, 139 preschool teachers (both school-based and

- Community Partner Programs) were awarded the scholarship and just recently completed their endorsement courses. 31 additional preschool teachers began the scholarship cohort process in the 2014-15 school year with completion projected in June 2016.
- 6. CPS and OECE conducted job fairs, college fairs, and recruitment efforts in January 2014, December 2014, February-March 2015, and will conduct another in June-August 2015 to recruit new preschool teachers with endorsements.
- 7. OLCE and OECE will offer cohorts for bilingual paraprofessionals to earn their Early Childhood Education teaching licenses and become teachers in our TBE or TPI Programs.
- 8. The District has plans to recruit current CPS students who are candidates for the State Seal of Biliteracy to Career and Technical Education Early Childhood Programs that would offer a pipeline from being a bilingual student in CPS to becoming a teacher in TBE or TPI preschool programs.
- The District has plans to explore opportunities for bilingual candidates with a Bachelor's degree
  to earn Alternative Licensure for Early Childhood Education with a bilingual endorsement and to
  then serve in TBE or TPI preschool programs.
- 10. OLCE, OECE, and ONS, through the P-2 ISL meetings, professional development, and collaboration, will provide support to schools with preschool ELs on best practice, instructional strategies, and teaching methods for working with preschool ELs.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Sample letter from OLCE regarding the number of ESL- and/or Bilingual-Endorsed Teachers they require
- 2. Sample letter/guidance regarding the allocation of positions to schools with 5 or more ELs
- 3. Spreadsheet of teachers accepted into the OECE/OLCE endorsement cohort in SY13
- 4. OLCE organizational chart for SY16 showing the new Early Childhood EL Instructional Specialist and new EL Network Specialist roles

#### Description of Internal Procedures for continued implementation after the ISBE visit

OLCE is restructuring and will have an EL Instructional Specialist assigned to early childhood. This individual will work closely with the Office of Early Childhood Education (OECE) on the intake, screening, placement, and transition process as well as professional development around working with English Learners.

With the restructuring, there will be 10 EL Network Specialists who will work with the Office of Network Supports (ONS) and the Networks themselves to ensure that Networks include ELs in their PD plans, that preschool classrooms are staffed with an appropriately-endorsed preschool teacher, and that intake, screening, placement, and transition protocols are followed in all CPS preschool programs.

OLCE, OECE, and ONS, through the P-2 Instructional Support Leader (ISL) meetings that take place every 6 weeks, professional development, and collaboration, will provide support to schools with preschool ELs on best practice, instructional strategies, and teaching methods for working with preschool ELs.

	SBE'S RESPONSE TO COP	RRECTIVE ACTION PLAN—October 8, 2015
Status of Corre	ective Action:	
□Accepted	☐ Partially Accepted	⊠ Not Accepted
Basis for Partial Acceptance or Non Acceptance: The District did not sufficiently address this finding.		
ISBE Clarification		Ind Progress Report:  d for all attendance centers, even with only one identified cation coming from OLCE to the Networks and schools

reflect this legal requirement. The submitted Preschool Handbook does not specify this information.

#### Please provide the following updates:

- 1) Outcome of the immediate steps listed above, with particular emphasis to how TPI programs will be fiscally supported as Step #3 only addresses TBE program funding allocations;
- 2) Update on the long term steps listed above;
- 3) Evidence that all necessary TPI programs have been established at the preschool level (such as class list with assigned teacher(s) and endorsement information).

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

#### OLCE and ECE has completed all of the following immediate steps for TPI PK programs:

- 1. The Office of Language and Cultural Education (OLCE) sent a letter in June 2015 to each school with ELs that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year. See sample letter in evidence.
- 2. OLCE will work with the Office of Network Support (ONS), Network Chiefs, and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter.
- 3. OLCE did allocate positions to schools with ELs in the following manner:
  - a. 0.5 supplemental position was awarded to district schools with 19 or less students at District. Charter Schools received funding per pupil based on EL enrollment.
- 4. OLCE will collaborate with ONS to ensure that all schools with ELs include ELs in their PD plan, and to ensure that administrators understand the rules and requirements around preschool TPI Programs

#### **OLCE** has started the following long term steps:

- 1. OLCE, OECE, and ONS, through the P-2 ISL meetings, professional development, and collaboration, will provide support to schools with preschool ELs on best practice, instructional strategies, and teaching methods for working with preschool ELs. See evidence of presentations
- 2. OLCE and the Office of Early Childhood Education (OECE), in partnership with Gateways, are providing scholarship cohorts to assist current preschool teachers with obtaining their ESL and/or Bilingual endorsements. During SY13, 139 preschool teachers (both school-based and Community Partner Programs) were awarded the scholarship and just recently completed their endorsement courses. 31 additional preschool teachers began the scholarship cohort process in the 2014-15 school year with completion projected in June 2016.
- CPS and OECE conducted job fairs, college fairs, and recruitment efforts in 2015, and will
  conduct additional job fairs this Spring 2016 to recruit new preschool teachers with
  endorsements.
- 4. OLCE and OECE will offer cohorts for bilingual paraprofessionals to earn their Early Childhood Education teaching licenses and become teachers in our TBE or TPI Programs.
- 5. The District has plans to recruit current CPS students who are candidates for the State Seal of Biliteracy to Career and Technical Education Early Childhood Programs that would offer a pipeline from being a bilingual student in CPS to becoming a teacher in TBE or TPI preschool programs.
- 6. The District has plans to explore opportunities for bilingual candidates with a Bachelor's degree to earn Alternative Licensure for Early Childhood Education with a bilingual endorsement and to then serve in TPI preschool programs.

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

 Evidence of Office of Language and Cultural Education (OLCE) and Office of Early Childhood Education (OECE) Collaboration - 3 PowerPoint presentations (2 from an OLCE Professional Development (PD) and 1 from an OECE PD in which OLCE and OECE collaborated to create the presentations and present them to teachers

- Agendas from the P-2 Instructional Support Leader (ISL) meetings held by OECE at which OLCE sends a representative (Jennifer Ramirez) to participate in the dialogue and collaboration around English Learner (EL) matters
- Agendas and the Early Literacy Action Plan Document from the P-2 Cross-Departmental Collaboration Meetings that bring OECE, OLCE, Office of Diverse Learner Supports and Services (ODLSS- Special Ed), Health and Wellness, Social-Emotional Learning, and all Content areas (Math, Science, Literacy, Social Science, Arts, PE) together to collaborate on P-2 instruction, PD, and guidance
- Sample school allocation letter for TPI program
- Copy of District Pre K Plan
- Flyers of CPS Job Fairs
- Spreadsheets with current teacher staffing for Pre K schools
- See a sample of completed Compliance Reviews from various schools. Sample includes elementary schools (including preK programs) and high schools, charters, schools from different geographic areas in the district, as well as schools that serve English learners from various language backgrounds

### ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard
3.7	TPI Program Establishment (K-12) 23 III. Adm. Code 228.25 (a)(2) When an attendance center has an enrollment of 19 or fewer English learners of any single language classification other than English, the school district shall conduct an individual student language assessment to determine each student's need for home language instruction and may provide a transitional bilingual program in the languages other than English common to these students. If the district elects not to provide a transitional bilingual program, the district shall provide a locally determined transitional program of instruction (TPI) for those students. (Section 14C-3 of the School Code; see Section 228.30(d) of this Part.) This subsection (a)(2) applies only to students enrolled in kindergarten or any of grades 1 through 12 in an attendance center.

Rating: Partially Implemented

**District Response Required: Yes** 

#### Finding:

Based on interviews with staff and the review of other documentation from the district:

• A Transitional Program of Instruction (TPI) is not established for language classifications with an enrollment of 19 or fewer students in kindergarten through grade 12 at some of the attendance centers that are required to have at least a TPI program.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

OLCE is sending a letter in April 2015 to each school with ELs that specifies the number of ESL and/or Bilingual-endorsed teachers that they are required to staff for the 2015-16 school year. OLCE will work with Network Chiefs and Budget to ensure that no school budgets are approved unless they contain at least the number of ESL/Bilingual-endorsed teachers specified in the school letter. OLCE is working with Budget to allocate positions to schools with ELs in the following manner:

- 0.5 supplemental position will be awarded using TBE/TPI funds to schools with 20-249 ELs to be used as an instructional position
- 1.0 supplemental position will be awarded using a combination of TBE/TPI and Title III funds to schools with 250+ ELs to be used as a 0.5 instructional and 0.5 coaching/professional development position

OLCE will collaborate with the Office of Network Supports to ensure that all schools with ELs include ELs in their PD plan

OLCE will provide guidance to schools on how to incorporate ESL into standards-based instruction and ensure that core content is differentiated using WIDA ELD standards for ELs.

OLCE will post guidance and ESL frameworks on the Knowledge Center in addition to providing training to ELPTs, Network ISLs, and teachers of ELs.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

OLCE has completed, disseminated, and posted on the Knowledge Center the ESL High School Framework. This document provides guidance to high school teachers of ESL 1,2,3 using CCSS and WIDA ELD standards and providing sample instructional activities for each course by quarter and by level.

OLCE is in the process of creating a similar document for elementary schools. OLCE is participating in the ISBE initiative to explore ESL instruction.

OLCE specialists assigned to networks will review lesson plans to ensure CCSS and ELD standards are evident in instruction and assessments.

#### Description of Internal Procedures for continued implementation after the ISBE visit

By July 1, 2015 OLCE will have an EL specialist assigned to each network. Part of their responsibilities will be to ensure that all OLCE initiatives are implemented with fidelity and coherence.

#### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015

#### **Status of Corrective Action:**

□ Accepted □ Partially Accepted □ Not Accepted

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

An update is necessary.

#### Required Elements of Corrective Action and Progress Report:

Please submit the following evidence:

- 1) An update regarding the development of the ESL Elementary Framework, including anticipated release date and procedures regarding dissemination of this information to attendance centers and networks;
- 2) Evidence of all schools with ELs have PD related to ELs in their PD plans;
- 3) Guidance referenced above regarding how to incorporate ESL into standards-based instruction and ensure that core content is differentiated using WIDA ELD standards for ELs;
- 4) A sample of the lesson plans referenced above; and,
- 5) Evidence that all necessary TPI programs have been established for grades K through 12 (such as class list with assigned teacher(s) and endorsement information).

#### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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 K-5 ESL Framework Project Plan outlines the timeline with release date and the persons responsible for executing the project plan. A March 19th PD event with hundreds of EL-endorsed and non-EL teachers with other email communications to Networks in March will disseminate the information required for attendance centers to know about this release and its corresponding procedures. School audits conducted by OLCE Network Specialists include a review of evidence of PD provided to TBE/TPI staff.

OLCE shared information with the CEO and with Network Chiefs in September related to the Instructional Integrity Plan and the school audits conducted as part of this initiative (please see the EL Instructional Audit document)

OLCE provided a webinar In September, 2015 to Network Chiefs and staff to present an overview of the Instructional Integrity Initiative, including nominating ELPTs for schools that serve ELs, the self-assessment tool (Quality Analysis Guide for School Bilingual Programs) to be completed by October 15, 2015, school visit planning, and next steps (please see the EL Instructional Integrity Webinar presentation).

OLCE Network Specialists started school audits in September 2015 as part of the district efforts to ensure consistency of program offerings across the district.

OLCE shared a memo with the Chief Officer of Strategy and Planning, Network Chiefs and other administrators, delineating the ways in which the Network Chiefs can review outcomes of visits in their networks, plan and set goals for next steps. The memo also included information for ways in which the Network Chiefs could include goals for program improvement when discussing and evaluating school principals (see OLCE Memo document).

#### May 2, 2016 Update:

In March, the Office of Network Supports, sent a memo to the Network Chiefs with an explanation of the school visit follow up procedures (see EL School Visits March 16 2016 memo). Following that communication, OLCE Network Specialists sent communication to principals of each school that had received a monitoring visit and a monitoring report: the communication included a copy of a letter from the CPS Chief Education Officer, Dr. Janice Jackson, explaining the follow up procedures, as well as a copy of the EL school visits Corrective Action Response Form (see the EL Principal Letters and EL School Visits Corrective Action Response Form). On April 4, 2016, the OLCE Chief Officer, Jorge, Macias, conducted a webinar for principals and ELPTs about the follow up procedures (see attached copy of the presentation). The Corrective Action Plans are due on May 13<sup>th</sup> and will be reviewed by OLCE before final ratings are completed for the 2015-2016 school year.

For charter schools, the initial letter from the Office of Network Supports (Office of Innovation and Incubation) was sent in April and was sent directly to each Charter Network (See final Corrective Action Final Notification). The charter schools also received a copy of the letter from the CEdO and Corrective Action Response Forms, which are due at OLCE on May 20<sup>th</sup>.

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

- See K-5 ESL Framework Project Plan
- See Sample Framework: MPIs and Sample Framework: CCSS & WIDA Skills Progression
- See Sample Unit Plan
- A copy of the Compliance Review form (with relevant sections highlighted).
- EL Instructional Integrity Audit Memo
- EL Instructional Integrity Webinar
- List of schools audited as of early January 2016
- OLCE Memo Document
- See a sample of completed Compliance Reviews from various schools. Sample includes elementary schools (including preK programs) and high schools, charters, schools from different geographic areas in the district, as well as schools that serve English learners from various language backgrounds

#### May 2, 2016 Update:

- Additional samples and info about the K-5 ESL Frameworks
- List of visited schools

- EL School Visits March 16 2016 memo
- EL Principal Letters
- EL School Visits Corrective Action Response Form
- EL Program Follow Up presentation.
- Final Corrective Action Final Notification

### ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: ⊠Accepted □ Partially Accepted □ Not Accepted

Component Number	Legal Standard
3.8	TPI Program Components 23 III. Adm. Code 228.30 (d)(2) Program Components – A transitional program of instruction must include instruction or native language support in the student's home language to the extent necessary, as determined by the district on the basis of the prescribed screening instrument or procedures, as applicable, required in Section 228.15(e) or the English language proficiency assessment required in Section 228.25(b), to enable the student to keep pace with his/her age or grade peers in achievement in the core academic content areas. A transitional program of instruction shall include instruction in ESL, which must align to the applicable English language development standards set forth in Section 228.10. A transitional program of instruction also may include, but is not limited to; (A) language arts in the students' home language; and (B) instruction in the history and culture of the country, territory, or geographic area that is the native land of the students or of their parents and in the history and culture of the United States.

Rating: Partially Implemented

District Response Required: Yes

#### Finding:

Based on interviews with staff and the review of other documentation from the district:

• Some of the attendance centers in the district do not provide instruction in ESL and other language support services to the ELs eligible for a transitional program of instruction.

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

OLCE will work with schools to ensure Transitional Programs of Instruction includes teaching staff with appropriate ISBE licensure and ESL and/or Bilingual endorsements. EL Specialists will be specifically assigned to work in network throughout the District specifically focusing on compliance and instructional support as outlined in federal, state, and district mandates.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

OLCE has completed, disseminated, and posted on the Knowledge Center the ESL High School Framework. This document provides guidance to high school teachers of ESL 1,2,3 using CCSS and WIDA ELD standards and providing sample instructional activities for each course by quarter and by level.

OLCE is in the process of creating a similar document for elementary schools. OLCE is participating in the ISBE initiative to explore ESL instruction.

Description of Internal Procedures for continued implementation after the ISBE visit		
ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015		
Status of Corrective Action:		
□Accepted □ Partially Accepted ⊠Not Accepted		
Basis for Partial Acceptance or Non Acceptance: The District did not sufficiently address this finding.		
Required Elements of Corrective Action and Progress Report:		
Please provide an updated response to this finding that accordingly addresses how instruction in ESL and other language support services will be provided to ELs in TPI programs.		
DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016		
Description of Corrective Action (For each Corrective 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		
OLCE is in the process of finalizing updates to the Bilingual Handbook (to be used instead of the separate EL Program Teacher Resource Guide and the Principal's Guide) to provide more clear guidance on the program models used to satisfy TBE and TPI requirements and the criteria schools have to use when deciding on part-time TBE placement for individual TBE students based on their needs. The Bilingual Handbook revisions are taking into consideration the recent release (December 9, 2015) of the excerpts from the upcoming Framing Services for English Learners in Illinois by ISBE DELL. The inclusion of Instructional Designs shared by ISBE in the Bilingual Handbook will further clarify the types of services that are appropriate for TPI students. Expectations for required TBE/TPI services do not change for schools based on their types (i.e. IB, charter, magnet, selective enrollment, etc.). The Bilingual Handbook, using the ISBE Framework as a resource, will have examples for ways in which Instructional Designs can look in elementary schools or middle/high schools that are departmentalized.		
List and Attach Evidence of Implementation of the Corrective Action		
Draft section from the Bilingual Handbook		
May 2, 2016 Update:  • See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)		
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN – 5/27/2016		
Status of Corrective Action:		
∇Accepted □ Partially Accepted □Not Accepted		

Component Number	Legal Standard
4.1	Standards Aligned Curriculum  20 USC 6826 (d)(3) 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.
	23 III. Adm. Code 228.30 (b)(4) 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 http://wida.us/standards/sla.aspx. No later amendments to or editions of these standards are incorporated by this Section.

Rating: Partially Implemented

**District Response Required**: Yes

#### Finding:

Based on interviews with staff and the review of documentation from the district:

- Some of the attendance centers (high schools) do not use the High School English as a Second Language Resource Framework developed by the district.
- The district has not developed an Elementary/Middle School English as a Second Language Resource Framework.
- Not all of the attendance centers that are required to provide instruction in Spanish Language Arts have a Spanish Language Arts curriculum aligned to the WIDA Spanish Language Arts Standards (2005).

#### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. Chicago Public Schools does not mandate curriculum, but OLCE will work to develop curricular guidelines for elementary, middle, and high schools regardless of the language of instruction.
- 2. These guidelines will incorporate appropriate grade-level Common Core State Standards (CCSS) as well as WIDA ELD, Spanish Language Arts and other standards that apply to TBE and/or TPI instructional settings.
- 3. Guidelines for language allocation in various TBE settings will also be provided.
- 4. The EL Instructional Manager will ensure completion and publication of these documents by the end of the 2015-2016 school year.

#### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Electronically: posted on the CPS Knowledge Center
- 2. Physical copies: disseminate guides to Network Chiefs, Principals, and ELPTs at the school level

#### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE Instructional Specialists will collaborate with the Office of Teaching and Learning and the Office of Early Childhood Education to develop curricular guidelines for EL students.
- 2. OLCE EL Network Specialists will collaborate with Network ISLs to ensure that the curricular guidelines are being implemented in classrooms where ELs are present

ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015		
Status of Corrective Action:		
□Accepted □Not Accepted		
Basis for Partial Acceptance or Non Acceptance: Additional information is necessary to fully address this finding. Some findings not addressed.		
Required Elements of Corrective Action and Progress Report:  Please provide an update as to the staffing of the EL Instructional Manager position.		
Please provide a detailed plan, including timeline and persons responsible, of the development of the curricular guidelines for elementary, middle, and high schools.		
Given that CPS does not mandate curriculum, please describe how OLCE will ensure that the curricular guidelines will be consistently implemented across attendance centers and by teachers, and all instruction will be aligned to the appropriate Illinois Learning Standards.		
District did not address Spanish Language Arts curriculum finding.		
DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016		
Description of Corrective Action (For each Corrective 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 K-5 ESL Framework Project Plan outlines the timeline with release date and the persons responsible for executing the project plan. A March 19th PD event with hundreds of EL-endorsed and non-EL teachers with other email communications to Networks in March will disseminate the information required for attendance centers to know about this release and its corresponding procedures. The High School Framework has already been produced and disseminated across the District.		
School audits conducted by OLCE Network Specialists include a review of the use of Spanish Language Arts standards by TBE programs. A Spanish Literacy Unit with Bilingual Units is in development (see evidence). To ensure more consistent implementation, trainings will be provided to ELPTs on the use of these curricular materials, associated texts, and why and how to adopt the planning processes.		
List and Attach Evidence of Implementation of the Corrective Action		
<ul> <li>OLCE Organizational Chart</li> <li>Project Plan for K-5 English as a Second Language Framework</li> <li>Project Plan for K-2 Spanish Literacy Bilingual Education Framework</li> <li>A copy of the Compliance Review form (with relevant sections highlighted)</li> <li>See a sample of completed Compliance Reviews from various schools.</li> </ul>		
May 2, 2016 Update:		
OLCE Organizational Chart		
<ul> <li>Additional samples and info about the K-5 ESL and K-2 Spanish Literacy Frameworks</li> </ul>		
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016		
Status of Corrective Action:		

□Not Accepted

□ Partially Accepted

⊠Accepted

Component Number	Legal Standard  Instructional Materials (Title III recipients) 20 USC 6912 (a)(2)(B) Grants awarded under this section may be used for(iv) improving the instruction programs for limited English proficient children by identifying, acquiring, and applying effective curricula instructional materials (including materials provided through technology), and assessments that are all aligned with State and local standards.	
4.2		
Rating: Partially Implemented  District Response Required: Yes		

### Finding:

Based on interviews with staff, classroom observations, and the review of documentation from the district:

• Some attendance centers do not have adequate or sufficient native language and ESL instructional materials to meet the needs of English learners.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

 By June 2016, OLCE Instructional Specialists will research ESL instructional materials and produce an Elementary Framework guidance document. EL Instructional Specialists will review native language materials from national publishers and provide recommended list for schools. The ESL High School Framework will be implemented in 2015-2016 in high schools with EL students.

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

1. Elementary Framework, recommended list of native language materials, School visit forms

### Description of Internal Procedures for continued implementation after the ISBE visit

1. OLCE Network Specialists will visit schools to ensure that they have received ESL and native language instructional materials.

## ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015 Status of Corrective Action: □Accepted □ Partially Accepted ☑Not Accepted

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

District did not submit all the aforelisted evidence documentation.

An update is also required in order to fully address this finding.

### Required Elements of Corrective Action and Progress Report:

Please submit the aforelisted attached evidence: elementary framework and recommended list of native language materials.

Please submit the following documentation:

- 1) Results of the June 2016 research conducted by OLCE Instructional Specialists; and,
- 2) Plans to purchase additional materials, including but not limited to, packing lists, purchase orders, and/or anticipate purchase date(s).

### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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 research continues to lead to a variety of text recommendations included in the attached evidence. Plans to purchase additional materials involve a vendor with books placed in classrooms across 204 schools by a target date of 4/1. We have met with this vendor two times in December, and ongoing conversations have occurred in January with the vendor expected to have a list of native language book set titles across grade levels shared with us by 1/15.

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

- Sample Unit Plan (ESL, includes texts)
- Suggested\_Spanish-Lit\_Reading\_BooksK-12-NY School District
- CPS Virtual Library Count of Titles by Home Language (ES, HS, and AS [Middle Grades])
- WIDA PRIME

### May 2, 2016 Update:

Purchase order copy

## ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard	
4.3	Purchased Equipment EDGAR 34 CFR 80.32 (d) (1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of property, who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property. (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years. (3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.	

Rating: Partially Implemented

**District Response Required**: Yes

### Finding:

Based on interviews with staff, classroom observations, and the review of documentation from the district:

• In some attendance centers, equipment purchased with Title III funds is not labeled and inventoried in accordance with EDGAR 34 CFR 80.32.

### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

The Office of Language and Cultural Education (OLCE) will create and distribute communication regarding the labeling and inventory of equipment purchased with Title III funds. The Chicago Public

Schools Grants Office will monitor the labeling and inventory of equipment purchased with Title III in accordance with EDGAR 34 CFR 80.32		
List of Attached Evidence of Completion of the Corrective Action (if applicable)		
Chicago Public Schools publishes internal accounts manual on district website outlining procedures for the inventory and labeling of equipment/materials purchased with grant funds.		
Description of Internal Procedures for continued implementation after the ISBE visit		
The Chicago Public Schools Grants Management annually audits schools to review adherence to grant funded program guidelines including the proper labeling and inventory of materials/equipment purchased with grant funds.		
ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015		
Status of Corrective Action:		
□Accepted □Not Accepted		
Basis for Partial Acceptance or Non Acceptance: An update is requested.		
Required Elements of Corrective Action and Progress Report:  Please provide an update regarding the distribution of communication regarding the labeling and inventory of equipment purchased with Title III funds, including evidence that the appropriate personnel has received this information. Please also provide an update to the annual audit conducted by Chicago Public Schools Grants Management.		
DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016		
Description of Corrective Action (For each Corrective 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		
OLCE collaborated with the Office of Grants Funded programs in the Spring and Summer of 2015 to review school reports related to the allocation of Title III funds, including purchased equipment. Office of Grant Funded Programs will continue to monitor how schools inventory and store equipment purchased with Title III funds during FY 16.		
OLCE collaborated with Office of Grant Funded Programs to Draft communication for monitoring visits and checklists to review fixed assets (purchased equipment) at schools.		
List and Attach Evidence of Implementation of the Corrective Action		
<ul> <li>Copy of CPS Fixed Asset Application Handbook</li> <li>Memo with Sample Report of Findings from Spring 2015</li> <li>Checklist of School Monitoring</li> </ul>		
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016		
Status of Corrective Action:   □ Partially Accepted □ Not Accepted		

Component Number	Legal Standard	
5.2	Acquisition Language Support Services for Students Whose Parents Refused services through the TBE/TPI Program  Section 1703(f) of the Equal Educational Opportunities Act (EEOA) requires state educational agencies (SEAs) and school districts to take action to overcome language barriers that impede English Language Learner (ELL) students from participating equally in school districts' educational programs.  20 USC 1703 (f) the failure by an educational agency to take appropriate action to overcome language barriers that impede equal participation by its students in its instructional programs.	

District Response Required: Yes

### Finding:

Based on interviews with staff and the review of documentation from the district:

 Not all the attendance centers provide program options for parents who refused or waived services of a TBE/TPI program.

### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

In order to ensure all the attendance centers provide program options for parents who refused or waived services of a TBE/TPI program the district will

- OLCE Compliance Specialists will amend Student Reclassification Request (SRR) to include language concerning the items to be discussed during the parent conference: 1. Benefits of Bilingual Education Programs, 2. Consequences for refusing i.e., promotion policy criteria, continuation of ACCESS testing and academic options if refuse, and the offering of other program options available to their child.
- 2. The amended SRR form will be translated in the (6) major languages in the district.
- 3. OLCE will collaborate with CPS Student Information System/IMPACT to add Parent Refusal Notification Letters to be generated annually by schools or in the case of an in-district transfer to the new school for parent of ELs with parental refusals.
- 4. OLCE Compliance Specialists will post amended SRR on the CPS Knowledge Center Language and Culture site
- 5. OLCE Specialists will distribute amended SRR to English Learner Program Teachers (ELPTs) via email attachment during first week of new school year 15-16
- 6. The SRR forms will be provided in the (6) major languages in the district. OLCE will collaborate with CPS Student Information System/IMPACT to add Parent CODE 13 Notification Letters. These letters will be generated annually by schools or in the case of an in-district transfer to the new school for parent of ELs with parental refusals.

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. OLCE updated SRR form.
- 2. Draft of New Parent Notification Letter
- 3. Agenda of meeting with Debra Price, CPS Student Information System/IMPACT

### Description of Internal Procedures for continued implementation after the ISBE visit

 OLCE Network Specialists will review all SRR Code 13, prior to submission for processing by OLCE Data Analyst. OLCE Network Specialists will provide technical assistance to ELPTs who have not implemented this procedure accurately.

ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015		
Status of Corrective Action:		
□Accepted □Not Accepted		
Basis for Partial Acceptance or Non Acceptance:		
Information regarding other program services or options that are available to the students are not sufficiently addressed		
Required Elements of Corrective Action and Progress Report:		
Revise the notice of support services letter to include all available programs offered in the school that are not TBE/TPI services. Example: Before and After School Program, Summer School Program and any other intervention programs.		
DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016		
Description of Corrective Action (For each Corrective 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		
OLCE holds periodic meetings with representatives from the IMPACT team. During the January 2016 meeting, OLCE indicated that some of the parental notification letters, including the Notice of Support Services generated through IMPACT, will need updates for the next school year. Please see the attached draft of changes. The changes will be submitted for IMPACT updates in the Spring 2016 to be deployed before the start of the next school year. Final versions of the updated letter will be submitted to be translated and subsequently uploaded to the Knowledge Center for the use of individual schools for the 2016-2017 school year.		
List and Attach Evidence of Implementation of the Corrective Action		
<ul> <li>Draft of updates to the Notification letter for refusals for the 2016-2017 school year.</li> </ul>		
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN – 5/27/2016		
Status of Corrective Action:		

Component Number	Legal Standard	
5.5	Program Facilities 23 III. Adm. Code 228.30 (a)(1) Program Facilities — Other than for preschool education programs, TBE and TPI programs shall be located in regular public school facilities rather than in separate facilities. (Section 14C-6 of the School Code [105 ILCS 5/14C-6]) If such a location is not feasible, the substitute location shall be comparable to those made available to a majority of the district's students with respect to space and equipment. If housed in a facility other than a public school (including a charter school), the school district shall provide a written explanation in its annual application to the State Superintendent of Education as to why the use of a public school building is not feasible.	

**District Response Required**: Yes

### Finding:

 Some of the attendance centers do not provide facilities for TBE/TPI instruction that are comparable to those made available to a majority of the other students with respect to space and/or equipment.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

The Office of Language and Cultural Education (OLCE) will communicate legal requirement regarding comparable space and/or equipment for TBE/TPI instruction during EL Principal Summer meeting. OLCE will also publish and distribute planning guidance to schools that includes legal requirements for TBE/TPI Instruction. Network Staff will monitor the comparable space and/or equipment in attendance centers. July 2015

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

Agenda for Summer Principal Training

Guidance Documents provided to schools outlining legal requirements for comparable facilities in TBE/TPI instructional classrooms

### Description of Internal Procedures for continued implementation after the ISBE visit

EL Network Specialists will monitor the comparable space and/or equipment in attendance centers

## ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015 Status of Corrective Action: □Accepted □Not Accepted □Not Accepted

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

Additional evidences needed.

### **Required Elements of Corrective Action and Progress Report:**

Please provide evidence for the following:

- Guidance documents provided to schools outlining legal requirements for comparable facilities in TBE/TPI instructional classrooms;
- A monitoring process to ensure that adequate facilities are provided for the TBE/TPI program classrooms; and,
- A monitoring form that includes program facilities that are used for TBE/TPI programs.

### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

As part of the school audits being completed by OLCE, one of the components of the visit focuses on equitable facilities for ELs and classroom observations are conducted.

Updated Bilingual Handbook will include a section on administrative provisions, including requirements for program facilities.

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

- A copy of the Compliance Review form (relevant section highlighted).
- A draft of the section of the handbook that includes information about program facilities.
- See a sample of completed Compliance Reviews from various schools.

### May 2, 2016 Update:

• See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)

## ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard  Extracurricular Activities 23 III. Adm. Code 228.30 (a)(3) Extracurricular Activities - Each district shall ensure that students enrolled in programs shall have the opportunity to participate fully in the extracurricular activities of the public schools in the district. (Section 14C-7 of the School Code [105 ILCS 5/14C-7])	
5.7		

Rating: Partially Implemented

District Response Required: Yes

### Finding:

Based on interviews with staff and the review of documentation from the district:

 Not all of the attendance centers ensure that parents of English learners are provided with information about school events and school activities in their home languages, so that their children have the opportunity to participate fully in extracurricular activities.

### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

The Office of Language and Cultural Education (OLCE) will distribute guidance to all schools regarding legal requirement for communication to the families of English Learners. OLCE will communicate legal requirement for communication to families of English Learners in Principal Summer meeting.

List of Attached Evidence of Completion of the Corrective Action (if applicable)

Guidance Document for TBE/TPI Programs June 2015

Agenda for Summer Principal Training			
Description of Internal Procedures for continued implementation after the ISBE visit			
EL Network Specialists will monitor the communication provided to families of English Learners during school visits.			
ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 8, 2015			
Status of Corrective Action:			
□Accepted ⊠ Partially Accepted □Not Accepted			
Basis for Partial Acceptance or Non Acceptance: Additional evidence needed.			
Required Elements of Corrective Action and Progress Report:			
Please provide the following:			
<ul> <li>Guidance to all schools regarding the legal requirement for communication to the families of English learners regarding extracurricular activities or</li> <li>Guidance document for TBE/TPI programs that includes languages specifically on extracurricular activities.</li> </ul>			
DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016			
Description of Corrective Action (For each Corrective 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			
As part of the school audits being completed by OLCE, some of the components of the visit focuses on equitable access to all educational programs, services, and activities for which TBE and TPI students are eligible			
Updated Bilingual Handbook will include a section on administrative provisions, including requirements for equitable access to extracurricular activities.			
List and Attach Evidence of Implementation of the Corrective Action			
<ul> <li>A copy of the Compliance Review form (relevant section highlighted).</li> <li>A draft of the section of the handbook that includes information about extracurricular activities.</li> <li>Principal Planning Document</li> <li>See a sample of completed Compliance Reviews from various schools.</li> </ul>			
May 2, 2016 Update:  ■ See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)			
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN – 5/27/2016			
Status of Corrective Action:			

Component Number	Legal Standard	
5.9	Summer School 23 III. Adm. Code 228.30 (a)(6) Preschool and Summer School - A school district may establish preschool and summer school programs for English learners, or join with other school districts in establishing such programs. Summer school programs shall not replace programs required during the regular school year. (Section 14C-11 of the School Code [105 ILCS 5/14C-11]) A school district that offers a summer school program or preschool program shall provide transitional bilingual education programs or transitional programs of instruction for English learners in accordance with Article 14C and this Part.	

District Response Required: Yes

### Finding:

Based on interviews with staff and the review of documentation from the district:

 Not all of the attendance centers that offer summer school programs provide TBE/TPI services for ELs.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

Only teachers with required Bilingual and/or ESL endorsements will be staffed and placed in Summer School classrooms with EL students. School Principals and EL Network Specialists will observe classroom instruction during Summer School to monitor that TBE/TPI services are provided to EL students.

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

Job description for Summer School Teachers

In an effort to properly identify ELs that should receive TBE/TPI summer services, the EL Network Specialist will collaborate with EL Network ISLs to gather data on student achievement in benchmark grades and assess the potential retention or promotion of ELs in accordance with the promotion policy. This data will be reported to the Office of Instructional Supports. This will align lists of ELs that are on the eligibility list to the list of ELs that are currently receiving TBE/TPI services.

### Description of Internal Procedures for continued implementation after the ISBE visit

In an effort to properly identify ELs that should receive TBE/TPI summer services, the EL Network Specialist will collaborate with Network ISLs to gather data on student academic progress in benchmark grades and assess the potential retention or promotion of ELs in accordance with the promotion policy. This data will be reported to the Office of Instructional Supports. This will align lists of ELs that are on the eligibility list to the list of ELs that are currently receiving TBE/TPI services.

## ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN— October 16, 2015 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard	
6.2	Teacher Qualification (K-12) 23 III. Adm. Code 228.35 (a) Each individual assigned to provide instruction in a student's home language shall meet the requirements for bilingual education teachers set forth in 23 III Adm. Code 25 (Educator Licensure) and 23 III. Adm. Code 1 (Public Schools Evaluation, Recognition and Supervision), as applicable. (b) Each individual assigned to provide instruction in ESL shall meet the requirements for ESL or English as a New Language teachers set forth in 23 III. Adm. Code 25 and 23 III. Adm. Code 1, as applicable.	

**District Response Required:** Yes

### Finding:

Based on interviews with staff, review of documentation from the district and Educator Licensure Information System (ELIS):

• Some of the teachers in kindergarten or any of grades 1-12 that are assigned to provide home language and/or ESL instruction do not have the required bilingual and/or ESL approval/endorsement for their assignment.

### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

To ensure that all teachers in Kindergarten or any grades 1-12 hold a valid Illinois teaching licensure,

- The Office of Language of Cultural Education compliance manager/compliance specialist will
  continue to collaborate with Talent Office, Office of Early Childhood, and Office of Diverse
  Learners Support Services to continue to create opportunities for teachers in grades Pre-K- 12 to
  become bilingual and ESL endorsed by summer 2016.
- 2. Due to limited low-incidence bilingual certified teachers, the Office of Language and Cultural Education chief/deputy chief will collaborate with Talent Office to provide a waiver for applicants enrolled in alternative programs in pursuit of educator licensure and bilingual/ESL endorsement(s). These opportunities will increase the number of highly qualified and endorsed bilingual/ endorsed teachers who will provide rigorous native language and ESL instruction our ELs.

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

Evidence for the action plan will be provided upon completion of the following milestones:

- 1. The district will provide reports generated by Talent Office of all teachers assigned to provide native language and/or ESL instruction.
- 2. University invoices will be available for review for each cohort established, and school monitoring documents.

### Description of Internal Procedures for continued implementation after the ISBE visit

To continue to increase the number of teachers endorsed in bilingual/ESL:

1. The Office of Language and Cultural Education compliance specialists will continue to collaborate with the Office of Diverse Learners and Support Services, Early Childhood Education,

and university partners to ensure that opportunities are provided to increase teachers endorsed in bilingual/ESL for Pre-K -12 by August 2016.

- 2. Network specialists will provide principals with required licensure information for teachers serving ELs
- Office of Language and Cultural Education network specialists will verify teachers' credentials of teachers servicing ELs and inform principals of any teachers not properly endorsed to ensure that teachers become endorsed.
- Office of Language and Cultural Education compliance specialists will monitor low-incidence language teachers enrolled in alternative program that will lead to licensure and bilingual/ESL endorsement(s),
- Office of Language and Cultural Education compliance manager/compliance specialist will
  continue to collaborate with Talent Office to ensure that vacant position are identified as bilingual
  and/or ESL, and include grade level to ensure that teachers applying for bilingual positions are
  properly endorsed.
- 6. Talent Office will regularly provide updated credentials of teachers servicing ELs to ensure that properly certified teachers are hired.

## ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN— October 16, 2015 Status of Corrective Action: ⊠Accepted □ Partially Accepted □ Not Accepted

Component Number	Legal Standard	
6.3	Highly Qualified Teachers 20 USC 6319 (a) (1) IN GENERAL: Beginning with the first day of the first school year after January 8, 2002, each local educational agency receiving assistance under this part shall ensure that all teachers hired after such day and teaching in a program supported with funds under this part are highly qualified(3) LOCAL PLAN: As part of the plan described in section 6312 of this title, each local educational agency receiving assistance under this part shall develop a plan to ensure that all teachers teaching within the school district served by the local educational agency are highly qualified not later than the end of the 2005-2006 school year.	

Rating: Partially Implemented

**District Response Required**: Yes

### Finding: (see Component 6.2 above)

Based on interviews with staff, review of documentation from the district and ELIS:

Some of the teachers in kindergarten or any of grades 1-12 that are assigned to provide home language and/or ESL instruction do not have the required bilingual and/or ESL approval/endorsement for their assignment.

### DISTRICT'S FIRST RESPONSE—June 30, 2015

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

To ensure that all teachers in Kindergarten or any grades 1-12 hold are bilingual and/or ESL endorsed,

- 1. The Office of Language of Cultural Education compliance manager/compliance specialist will continue to collaborate with Talent Office, Office of Early Childhood, and Office of Diverse Learners Support Services to continue to create opportunities for teachers in grades Pre-K- 12 to become bilingual and ESL endorsed by summer 2016.
- 2. Due to limited low-incidence bilingual certified teachers, the Office of Language and Cultural Education chief/deputy chief will collaborate with Talent Office to provide a waiver for applicants enrolled in alternative programs in pursuit of educator licensure and bilingual/ESL endorsement(s). These opportunities will increase the number of highly qualified and endorsed bilingual/ endorsed teachers who will provide rigorous native language and ESL instruction our ELs.
- OLCE will continue to partner with CPS departments and universities to provide reduced tuition and cohort opportunities for teachers in Pre-K through 12th grade, including charter school teachers to increase the number of bilingual/ESL endorsed teachers by August 2016.(implementation and Expected Date of Completion)

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

Evidence for the action plan will be provided upon completion of the following milestones:

- 1. The district will provide reports generated by Talent Office of all teachers assigned to provide native language and/or ESL instruction.
- University invoices will be available for review for each cohort established, and school monitoring documents.

### Description of Internal Procedures for continued implementation after the ISBE visit

The Office of Language and Cultural Education will continue to collaborate with the Office of Diverse Learners, and Talent Office with university partners to ensure that we continue to increase the number of teachers endorsed in bilingual/ESL for Pre-K - 12 by providing cohort opportunities.

OLCE EL network specialists will provide principals with required licensure information for teachers serving ELs.

OLCE specialists will verify teachers' credentials of teachers servicing ELs and inform principals of any teachers not properly endorsed to ensure that teachers become endorsed. OLCE specialists will monitor low-incidence language teachers enrolled in alternative program that will lead to licensure and bilingual ESL endorsement(s).

OLCE will continue to collaborate with Talent Office to ensure that vacant position are identified as bilingual and/or ESL, and include grade level to ensure that teachers applying for bilingual positions are properly endorsed.

Talent Office will regularly provide OLCE with updated credentials of teachers servicing ELs to ensure that properly endorsed teachers are hired.

ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN— October 16, 2015		
Status of Corrective Action:		
⊠Accepted	□ Partially Accepted	□Not Accepted

# Component Number Legal Standard In-Service Training for Staff 23 III. Adm. Code 228.35 (e) Professional Development for Staff (1) Each school district having a program shall annually plan professional development activities for the licensed and nonlicensed personnel involved in the education of English learners. This plan shall be included in the district's annual application and shall be approved by the State Superintendent of Education if it meets the standards set forth in subsections (e)(2) and (e)(3). (2) Program staff beginning their initial year of service shall be involved in training activities that will develop their knowledge of the requirements for the program established under this Part and the employing district's relevant policies and procedures. (3) Training activities shall be provided to all bilingual program staff at least twice yearly and shall address at least one of the following areas: (A) current research

will develop their knowledge of the requirements for the program established under this Part and the employing district's relevant policies and procedures. (3) Training activities shall be provided to all bilingual program staff at least twice yearly and shall address at least one of the following areas: (A) current research in bilingual education; (B) content-area and language proficiency assessment of English learners; (C) research-based methods and techniques for teaching English learners; (D) research-based methods and techniques for teaching English learners; and (E) the culture and history of the United States and of the country, territory or geographic area that is the native land of the students or of their parents... (5) Each district that operates either a TBE or a TPI program for students of Spanish language background in kindergarten and any of grades 1 through 12 shall provide annually at least one training session related to the implementation of the Spanish language arts standards required under Section 228.30(b)(4) for staff

### District-Wide Professional Development for All Staff (Title III Recipients Only)

members of that program who are providing instruction in the Spanish language arts.

**20 USC 6825** (c)REQUIRED SUBGRANTEE ACTIVITIES – An eligible entity receiving funds under section 6824(a) of this title shall use the funds—...(2) to provide high-quality professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instruction educational programs), principals, administrators, and other school or community-based organizational personnel, that is—(A) designed to improve the instruction and assessment of limited English proficient children;(B) designed to enhance the ability of such teachers to understand and use curricula, assessment measures and instruction strategies for limited English proficient children;(C) based on scientifically based research demonstrating the effectiveness of the professional development in increasing children's English proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers; and (D) of sufficient intensity and duration (which shall not include activities such as one-day or short-term workshops and conferences) to have a positive and lasting impact on the teachers' performance in the classroom, except that this subparagraph shall not apply to an activity that is one component of a long-term, comprehensive professional development plan established by a teacher and the teacher's supervisor based on an assessment of the needs of the teacher, the supervisor, the students of the teacher, and any local educational agency employing the teacher.

### Adequate Training for Qualified Staff

Castaneda v. Pickard, 648 F. 2d 989, 1013. 1981... As in any educational program, qualified teachers are a critical component of the success of a language remediation program. A bilingual education program, however sound in theory, is clearly unlikely to have a significant impact on the language barriers confronting limited English speaking school children, if the teachers charged with day-to-day responsibility for educating these children are termed "qualified" despite the fact that they operate in the classroom under their own unremedied language disability

Rating: Partially Implemented

**District Response Required**: Yes

### Findings:

Based on interviews with staff and the review of documentation from the district:

- Some of the attendance centers do not provide training activities that help develop knowledge of basic TBE/TPI program requirements to program staff beginning their initial year of teaching at the District.
- Some of the attendance centers do not provide training activities that are related to the education
  of ELs at least twice yearly for the certificated and non-certificated personnel involved in the
  education of students of limited English proficiency.
- Training sessions related to the implementation of Spanish language arts standards are not provided at least once a year for teachers in all the attendance centers that are required to provide Spanish language arts.
- High-quality professional development that is designed to improve the instruction and

- assessment of English learners is not consistently provided to classroom teachers, principals, and administrators across all the attendance centers.
- Attendance centers that currently do not have adequate staffing to provide services required by a TBE/TPI program do not provide adequate interim training to teachers already on staff to comply with Title VI of the Civil Rights Act of 1964.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

### Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. OLCE Instructional Specialists will plan and deliver teacher PD according to network/school needs in collaboration with the EL Network Specialist and EL Instructional Support Leaders.
- 2. OLCE will provide principals and administrators PD during July 7, 8, 9 & 14 2015.
- 3. EL Network Specialists will continue to provide PD at monthly principal meetings in collaboration with EL Network ISLs.
- 4. OLCE will provide teachers with training for Spanish Language Arts Standards during Teacher Institute on August 3-5, 2015 and at the upcoming June 29 through July -2, 2015 Common Core and More institute with Consultants from the IRC.
- 5. OLCE will encourage all district -wide teachers of ELs and administrators the opportunity to attend Saturdays with OLCE PD workshops and training during the fall of 2015 and spring 2016.

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

- 1. Agendas and power points for PDs will be submitted July 2015 for sessions
- 2. Interdisciplinary curricular units will be posted and available and link will be provided for viewing.
- 3. Attendance/Sign-In Sheets for PD Sessions
- 4. Evaluations

### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. To provide training around TBE/TPI program requirements to first year program staff, OLCE Instructional Specialists will plan and EL Network Specialists will deliver PD in various formats (webinars, in-person workshops, and tutorials) according to network/school needs in collaboration with the EL Instructional Support Leaders. OLCE will gather feedback and evaluations on the effectiveness of these sessions and on the number of program staff served. OLCE Specialists will communicate attendance to Network Instructional Support Leaders, Network Chiefs, and Office of Network Supports.
- 2. To provide training around EL Education twice yearly for certificated and non-certificated staff involved in the education of ELs, OLCE EL Network Specialists will continue to provide PD around best practices and EL education at monthly principal and teacher meetings/school designated PD in collaboration with EL Network Instructional Support Leaders. OLCE Specialists will communicate attendance to Network Instructional Support Leaders, Network Chiefs, and Office of Network Supports. OLCE will gather feedback and evaluations on the effectiveness of these sessions and on the number of program staff served.
- To provide a yearly session around Spanish Language Arts standards for teachers required to teach Spanish Language Arts, OLCE will provide bilingual teachers with training on interdisciplinary curricular design aligned to the Spanish Language Arts and WIDA ELD English

Language Development Standards during its August 2015 Teacher Institute and a Common Core and More Conference scheduled from June 29 to July 2. OLCE will monitor and inform Network personnel on attendance. OLCE will gather feedback and evaluations on the effectiveness of these sessions and on the number of program staff served.

4. To provide high quality professional development on how to improve the instruction and assessments of ELs to all teachers, administrators, and principals across the district, OLCE EL Instructional Specialists in collaboration with Office of Early Childhood, Office of Diverse Learners, Department of Assessment, and various consultants will plan and deliver workshops at least twice yearly (in Winter and Spring). OLCE Specialists will promote and communicate attendance to Network Instructional Support Leaders, Network Chiefs, and Office of Network Supports.

ISBE	'S RESPONSE TO CORR	ECTIVE ACTION PLAN— October 16, 2015
Status of Corrective Action:		
⊠Accepted	☐ Partially Accepted	□Not Accepted

Component Number	Legal Standard
7.1	Notice of Enrollment; Content; Rights of Parents  105 ILCS 5/14C-4) (from Ch. 122, par. 14C-4) No later than 30 days after the beginning of the school year or 14 days after the enrollment of any child in a program in transitional bilingual education during the middle of a school year, the school district in which the child resides shall notify by mail the parents or legal guardia of the child of the fact that their child has been enrolled in a transitional bilingual education program or transitional program of instruction. The notice shall be in English and in the home language of the studer and contain all of the following information in simple, nontechnical language: (1) The reasons why the chil has been placed in and needs the services of the program. (2) The child's level of English proficiency, ho this level was assessed, and the child's current level of academic achievement. (3) The method of instruction used in the program and in other available offerings of the district, including how the program differs from those other offerings in content, instructional goals, and the use of English and native language instruction (4) How the program will meet the educational strengths and needs of the child. (5) How the program we specifically help the child to learn English and to meet academic achievement standards for grade promotic and graduation. (6) The specific exit requirements for the program, the expected rate of transition from the program into the regular curriculum, and the expected graduation rate for children in the program if the program is offered at the secondary level. (7) How the program meets the objectives of the child's individual educational program (IEP), if applicable. (8) The right of the parents to decline to enroll the child in the program or to choose another program or method of instruction, if available. (9) The right of the parents to vis transitional bilingual education classes in which their child is enrolled and to come to the school for conference to explain the nature of transit

Rating: Partially Implemented

District Response Required: Yes

### Findings:

Based on interviews with staff, review of student files, and the review of documentation from the district:

- Not all of the attendance centers in the district consistently send written notice to the parents of English learners to inform them that their child was enrolled in a TBE/TPI program.
- When the written notice is sent, some of the attendance centers do not send them within the statutory timeframe.
- When the attendance center sends the notifications, they are not consistently sent to parents of

English learners in English and in all the English learners' home languages, where feasible. **DISTRICT'S FIRST RESPONSE—June 30, 2015** Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion) In order to ensure mandated Parent Notification Letters are distributed to all parents in a timely manner in the home language 1. OLCE Chief will collaborate with the Chief Officer of Network Support to generate a statement letter concerning this mandate. 2. OLCE Deputy and Specialist in collaboration with Debra Price of the Student Information System/IMPACT will ensure updated parent notification letters 3. Notification letters will be available for printing 21 days after the beginning of the school year to be distributed to parents no later than 30 days after the beginning of the school year. 4. OLCE in collaboration with Language Lines will create PDF versions of the parent letters in their home language and English. 5. Parent Notification Letter templates will be posted on the knowledge center by August 30th, 2015 for ELPTs to provide to parents of eligible ELs by the 30th day. 6. ELPTS will ensure Parents with eligible students who have enrolled during the middle of the school year will receive parent notification letters 14 days from enrollment. 7. ELPTS will receive guidance concerning new letters end of August, 2015 List of Attached Evidence of Completion of the Corrective Action (if applicable) 1. Agenda for collaboration meeting and minutes. 2. Drafts of revised Parent Notification Letters Description of Internal Procedures for continued implementation after the ISBE visit 1. OLCE Specialist will monitor student records verifying notification has been distributed during school visit records check. ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 16, 2015 Status of Corrective Action: □Accepted □ Partially Accepted □Not Accepted Basis for Partial Acceptance or Non Acceptance: An update is requested. Required Elements of Corrective Action and Progress Report: Please provide an update regarding the student records monitored by the OLCE Specialist. DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016 Description of Corrective Action (For each Corrective 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 School audits conducted by OLCE Network Specialists include a review of EL Student Records.

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

- A copy of the Compliance Review form (with relevant sections highlighted)
- See a sample of completed Compliance Reviews from various schools.

ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016
(1 8 4)

Status of Corrective Action:		
⊠Accepted	☐ Partially Accepted	□Not Accepted

Component Number	Legal Standard
7.2	Progress Reports 23 III. Adm. Code 228.40 (c)(1) Maintenance of Records and Reporting Procedures (1) Report Cards - 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.

**District Response Required**: Yes

### Findings:

Based on interviews with staff, review of student files, and the review of documentation from the district:

- In some of the attendance centers, progress reports are written in English but not in all the English learners' home languages and written agreements from ELs' parents to waive this requirement are not obtained.
- Some of the progress reports used by attendance centers in the district do not indicate progress in the TBE/TPI program.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. Progress reports are written will be available in all the English learners' home languages and written agreements from ELs' parents to waive this requirement; and progress reports will indicate progress in the TBE/TPI program by:
- 2. OLCE Chief, Karen Garibay-Mulattieri will draft a memorandum to all principals, Network Chiefs, EL Network Instructional Support Leaders (ISLs) and English Language Program Teachers (ELPTs) by August 30, 2015

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

1. OLCE will provide copy of parent waivers, which are provided in seven languages

### Description of Internal Procedures for continued implementation after the ISBE visit

- OLCE Chief will send memorandum as a reminder that all progress reporting must be in the home language unless a parent signs waiver and importance of reporting EL progress in TBE/TPI
- 2. OLCE Specialists will collaborate with Network ISLs to monitor dissemination of report card waivers by all network schools by September 30th of every school year, beginning SY 2015
- 3. OLCE EL Network Specialists will check EL folders to check for waiver during school visits on a quarterly basis
- OLCE EL Network Specialists will discuss progress reporting during quarterly trainings with ELPTs

# ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN— October 16, 2015 Status of Corrective Action: □ Accepted □ Partially Accepted ☑ Not Accepted Basis for Partial Acceptance or Non Acceptance: Further action is required to fully address this finding.

### **Required Elements of Corrective Action and Progress Report:**

District's response appears to be incomplete (specifically, #1 in the Description of Corrective Action section). Please update and clarify.

Please submit the following evidence:

- 1) Memorandum sent by OLCE Chief and evidence that all relevant staff have been informed of this requirement;
- 2) Update of collaboration of OLCE Specialists with Network ISLs ensuring the report card waiver dissemination;
- 3) Update on EL folders check conducted by OLCE EL Network Specialists; and,
- 4) Quarterly training materials with ELPTs.

Furthermore, the Mandarin translation of the report card waiver is not accurate; in particular, the Mandarin waiver states that unless parents indicate, progress reports will be sent in English. Please correct and resubmit the Mandarin waiver, and detail OLCE procedures to ensure the accuracy of the translation in other languages.

### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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 description above should read: "Progress reports will be available in all the English learners' home languages where feasible, and written agreements from ELs' parents to waive this requirement will be collected from parents who choose to waive their rights for the translation"

Information about the use of the report card waiver is included in the currently used EL Program Teacher Resource Guide and the ELL Principal Handbook. This information will be updated in the new Bilingual Handbook currently under revision.

Information about the use of the report card waiver was included in the ELPT training conducted by OLCE Network Specialists across networks during the first quarter.

School audits conducted by OLCE Network Specialists include a review of EL Student Records, including the report card waiver.

OLCE is in the process of updating the report card waiver for the next school year (please see the attached draft). Translations of the final version of the waiver will be updated using a CPS approved vendor for translation services.

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

- EL Program teacher Resource Guide
- ELL Principal Handbook
- New EL Program Teacher training presentation
- A copy of the Compliance Review form (with relevant sections highlighted)
- See a sample of completed Compliance Reviews from various schools.
- A draft of proposed updates to the report card waiver for the next school year.

## May 2, 2016 Update: ■ See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3) ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN – 5/27/2016 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard
7.3	Withdrawal by Parents 23 III. Adm. Code 228.40 (a)(2) Withdrawal by Parents – 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).

Rating: Partially Implemented

District Response Required: No

### Findings:

Based on interviews with staff, review of student files, and the review of documentation from the district:

- The procedure for obtain and filing written notice from parents who requested to withdraw their children from the TBE/TPI program is not consistently implemented across the attendance centers; in many cases, files contained the change of status form, but not a written notice from parents.
- Parents of students who refused or withdrew their children from TBE/TPI services no longer receive notifications about eligibility or the exit notification.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

OLCE will review and revise the Student Reclassification Recommendation (SRR) Form to ensure it is specific and clearly outlines procedures and Exit Code Reasons. OLCE will explore the possibility of this form being completed electronically to ensure its accuracy before it is printed and signed by the parents, ELPT, Counselor/Case Manager, and principal.

OLCE will clearly articulate procedures for withdrawing ELs from TBE/TPI programs via ELPT trainings, principal and network meetings, published OLCE handbooks, as well as post procedures on the Knowledge Center. For example, OLCE will articulate that the district requirement is a handwritten note from parents when withdrawing ELs from TBE/TPI Programs.

List of Attached Evidence of Completion of the Corrective Action (if applicable)

Evidence will be collected via the revised SRR form, ELPT Training agendas, information posted on the Knowledge Center, Data for refusal of EL services.

Description of Internal Procedures for continued implementation after the ISBE visit

As of July 1st, OLCE EL Specialists will be assigned to Networks. They will ensure procedures are articulated and followed. They will also receive ELL Extract data to monitor parent refusals.

ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 16, 2015
Status of Corrective Action:
□Accepted □Not Accepted
Basis for Partial Acceptance or Non Acceptance:
An update is requested.
Required Elements of Corrective Action and Progress Report:
Please provide an update regarding the assignment of OLCE EL Specialists to Networks and how they
ensured procedures are articulated and followed.
DISTRICT'S SECOND RESPONSE – January 15, 2016 & May 2, 2016
Description of Corrective Action (For each Corrective 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
Information about the procedures for parental refusals/withdrawals is included in the handbook for EL program teachers. Training related to these procedures is provided in each network during the first
quarterly training for EL Program teachers by OLCE Network Specialists.
Procedures for parental refusals are one of the components examined during OLCE's school audits.
May 2, 2016 Update:
The Chicago Board of Education passed the Bilingual Education Policy on March 23, 2016.
List and Attach Evidence of Implementation of the Corrective Action
A copy of the ELPT Handbook (see page 65-66)
A sample of a first quarter ELPT training presentation
A copy of the Compliance Review form (relevant sections highlighted).
<ul> <li>See a sample of completed Compliance Reviews from various schools.</li> </ul>
May 2, 2016 Update:
Copy of the new Bilingual Education Policy
<ul> <li>See a copy of the current draft of the Bilingual Education Handbook (in folder 0.3)</li> </ul>
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016
Status of Corrective Action:
⊠Accepted □ Partially Accepted □Not Accepted

Component Number	Legal Standard
7.4	Notice and Consent for Continued Placement or Early Exit  105 ILCS 5/14C-3 A child of limited English-speaking ability enrolled in a program in transitional bilingual education may, in the discretion of the school district and subject to the approval of the child's parent or legal guardian, continue in that program for a period longer than 3 years No school district shall transfer a child of limited English-speaking ability out of the program in transitional bilingual education prior to his third year of enrollment therein unless the parents of the child approve the transfer in writing, and unless he child has received a score on said examination which, in the determination of the State Board, reflects a level of English language skills appropriate to his or her grade level.

District Response Required: No

### Findings:

Based on interviews with staff, review of student files, and the review of documentation from the district:

- Not all the attendance centers consistently obtained written consent from parents to enroll an EL in the TBE/TPI program for a period longer than three (3) years.
- The District does not use a notification letter for parents of English learners who have met the exit criteria but may be still eligible for services to inform the parents of the recommended placement and parental right to accept or reject that placement.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

Update Parent Notification Letters to include ISBE administrative rules for notice and consent for continued placement or early exit. ELPTs will distribute letters in English with a copy of the letter in the student's home language 30 days from beginning of school year and for those eligible ELs who enroll thereafter.

List of Attached Evidence of Completion of the Corrective Action (if applicable)

Parent Notification Letters will be available for review electronically.

Description of Internal Procedures for continued implementation after the ISBE visit

OLCE Specialist will monitor student records verifying notification has been distributed during school visit records check

IS	BE'S RESPONSE TO COR	RRECTIVE ACTION PLAN—October 16, 2015
Status of Corrective Action:		
□Accepted	⊠ Partially Accepted	□Not Accepted
Basis for Partial Acceptance or Non Acceptance:		
An update is necessary.		
Required Elements of Corrective Action and Progress Report:		

Please provide an update regarding monitoring of student records conducted by OLCE Specialist.

### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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

School audits conducted by OLCE's Network Specialists include components that focus on the review of student records.

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

- A copy of the Compliance Review form with relevant sections highlighted.
- Copy of a letter for students who meet proficiency criteria prior to 3 years.
- Samples of translated versions of the letter.
- See a sample of completed Compliance Reviews from various schools.

### ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN – 5/27/2016 Status of Corrective Action: □ Partially Accepted □ Not Accepted

Component Number	Legal Standard
7.6	Parental Participation (Title III Recipients Only) 20 USC 7012 (e) PARENTAL PARTICIPATION: (1) IN GENERAL- Each eligible entity using funds provided under this title to provide a language instruction educational program shall implement an effective means of outreach to parents of limited English proficient children to inform such parents of how they can - (A) be involved in the education of their children; and (B) be active participants in assisting their children - (i) to learn English; (ii) to achieve at high levels in core academic subjects; and (iii) to meet the same challenging State academic content and student academic achievement standards as all children are expected to meet. (2) RECEIPT OF RECOMMENDATIONS The outreach described in paragraph (1) shall include holding, and sending notice of opportunities for, regular meetings for the purpose of formulating and responding to recommendations from parents described in such paragraph.

Rating: Partially Implemented

District Response Required: No

### Findings:

Based on interviews with staff and the review of documentation from the district:

- Some of the attendance centers in the district do not implement an effective means of outreach to parents of English learners to inform them how they can be involved in the education of their children and be active participants in assisting their children to learn English and to achieve at high levels.
- Not all of the attendance centers who enroll English learners hold regular meetings for the purpose of formulating and responding to recommendations from parents of English learners.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

The Office of Language and Cultural Education (OLCE) will update and distribute a guide to all schools regarding legal requirement for Chicago School Reform act requiring all schools with English Learners to maintain a standing committee of the Local School Council to address EL concerns, in addition the requirement of a stand-alone Bilingual Parent Advisory Committee of English Learners. OLCE will

communicate these legal requirements for families of English Learners in the Principal Summer institute to be held July, 2015. Strategies for Schools when communicating with parents of ELs in English and home language (as available) concerning how they can: be involved in the education of their children; be active participants in assisting their children to learn English; (ii) to achieve at high levels in core academic subjects; and (iii) to meet the same challenging State academic content and student academic achievement standards as all children are expected to meet. In order to document these communications schools will be required to maintain a binder/files ""Bilingual/ESL Parent Engagement and Communication" as stated in the guide. This binder/file will include information shared in various settings and forms as documented by schools, such as: Open House, Report Card Pick-Up, BAC Meetings, mailings, posted on website, or bulletin boards, parent-teacher communications. Schools will provide various opportunities for parents to share recommendations in different settings. These meetings and/or conversations will be documented and responses kept in School Bilingual/ESL Binder. OLCE will share OLCE Guide to Schools concerning Bilingual/ESL Parent Outreach expectations requesting schools to sending notice of opportunities for, regular meetings for the purpose of formulating and responding to recommendations from parents described in such paragraph. Committees: No Child Left Behind (PAC), Bilingual Advisory Committee (BAC), Local School Council (LSC), Parent-Teacher Organization/Association (PTO/PTA).

Other: Parent Mentors, Parent Coordinators, Principal/AP/ELPT, Classroom teacher

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

The Office of Language and Cultural Education (OLCE) Community Relation Representatives will distribute Bilingual/ESL Parent Guide during July Principal Institute. Principals will distribute and maintain copies for their local LSC and BAC. OLCE Community Relation Representatives will distribute copies to the local BAC during their organizational (election) meeting. OLCE Community Relation Representatives will distribute to English Learner Program Teachers during open of the new school year.

### Description of Internal Procedures for continued implementation after the ISBE visit

OLCE Specialist and CRR's will review School Bilingual/ESL Binder 2.OLCE Specialist and CRR's will review School Bilingual/ESL Binder and provide technical assistance in responding to parent's recommendations. Community Relations Representatives will continue working with Networks Staff to monitor the service provided to the parents of English Learners.

### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 16, 2015

### **Status of Corrective Action:**

□ Accepted □ Partially Accepted □ Not Accepted

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

An update is required.

### **Required Elements of Corrective Action and Progress Report:**

Please submit the following evidence:

- 1) Evidence of training at July Principal Institute, including but not limited to, participant sign-in sheets:
- 2) Evidence that Principals distributed and maintained copies of the Bilingual/ESL Parent Guide;
- 3) A sample of evidence that LSCs has standing committees to address EL concerns and BPACs have been established; and,
- 4) A sample of planned outreach activities (including necessary translation of forms and interpretation provided at scheduled events, etc.) and scheduled meetings at a variety of attendance centers.

### DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016

Description of Corrective Action (For each Corrective 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 Chief of OLCE presented to principals and administrators on the rights of English Learners, including legally required parental engagement through the Bilingual Advisory Councils and Chicago Multilingual Parent Committee. The 4 OLCE Community Relations presented sessions for principals at the OLCE Principal Institute, the Teacher Institute (August), and in all networks in the district.

The BAC Guide was also distributed to schools and published on the knowledge center (CPS Internal webpage for teachers, principals, and administrators)

Schools are also being monitored by 10 OLCE Specialists and 4 OLCE Community Relations Representative to ensure schools form Bilingual Advisory Councils, with elected members, and conduct a minimum of quarterly meetings.

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

- PowerPoints, Handouts, Program Booklet, and Sign-In Sheets for the OLCE EL Principal Institute titled Quality Instruction for English Learners held July 7-9, 2015
- A copy of the Compliance Review form with relevant sections highlighted.
- See a sample of completed Compliance Reviews from various schools.
- Parent Conference 5/2/15 Flyers
- Samples of presentations for parents from local BACs available in English, Spanish, and Polish that were presented in four areas of the district in November, 2015.

## ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016 Status of Corrective Action: ⊠Accepted □ Partially Accepted □Not Accepted

Component Number	Legal Standard
8.4	Maintenance of Records 23 III. Adm. Code 228.15 (d)The completed home language survey form shall be placed into the student's temporary record as defined in 23 III. Adm. Code 375(Student Records).  III. Adm. Code 228.40 (c)(3) Records - School districts shall maintain records of each student enrolled in programs in the manner prescribed in 23 III. 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 III. Adm. Code 375.

Rating: Partially Implemented

District Response Required: No

### Findings:

Based on interviews with staff and the review of student files, some of the attendance centers do not maintain the records of each student enrolled in a TBE/TPI program in the prescribed manner. The following items are missing or inconsistently filed:

- A completed HLS;
- Program entry/exit information, including annual continuation letters, parental consent for exit before three years of services or continuation beyond three years of services, and written

notification of a parent's desire to withdraw their child from the program;

- Dates of the initial English language proficiency screener and scores;
- Scores of annual English language proficiency assessments;
- Documentation of conferences and written communication to parents of ELs;
- The rationale for a student's placement in a part-time TBE program (if applicable); and
- Parents' report card waiver.

### **DISTRICT'S FIRST RESPONSE—June 30, 2015**

Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)

- 1. OLCE Chief will collaborate with technology team to explore development of electronic file portfolio to house original documents which will include the HLS, and the state prescribed screener.
- 2. OLCE specialist will continue to communicate with principals and LOTS of the requirements of bilingual folders to include the forms and documents mentioned.

### List of Attached Evidence of Completion of the Corrective Action (if applicable)

1. Bilingual folders will be available for review at the school site.

### Description of Internal Procedures for continued implementation after the ISBE visit

- 1. OLCE Specialist will review bilingual folders during school site visit to ensure that all required documents are available.
- 2. Any missing documents can be generated off of IMPACT-SIM.
- OLCE will also collaborate and communicate with counselors to ensure that bilingual folders are included in the cumulative folders as student transfer to other schools.

### ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 16, 2015 Status of Corrective Action: □ Partially Accepted **⊠**Accepted □Not Accepted

Component Number	Legal Standard
8.5	Immigrant Student Count NCLB Title III, 20 USC 7011 (6) IMMIGRANT CHILDREN AND YOUTH - The term 'immigrant children and youth' means individuals who— (A) are aged 3 through 21; (B) were not born in any State; and (C) have not been attending one or more schools in any one or more States for more than 3 full academic years.
Rating: Not Implemented	
District Respon	nse Required: Yes
	trict's data collection system does not ensure that only eligible immigrant students are

DISTRICT'S FIRST RESPONSE—June 30, 2015
Description of Corrective Action (For each Corrective Action Activity, please list Title/Role of Person(s) Responsible for Implementation and Expected Date of Completion)
The district data system will be updated in August 2015 to ensure only eligible immigrant students are included in the immigrant student count in data submitted to ISBE. Data Analyst and CPS Tech Team.
List of Attached Evidence of Completion of the Corrective Action (if applicable)
Review SIS Data in Fall 2015 to ensure data accurately captures only eligible immigrant students.
Description of Internal Procedures for continued implementation after the ISBE visit
OLCE Compliance Specialists, Data Analyst, and CPS Tech Team will upgrade student information system and monitor monthly that data for eligible immigrants is reported to ISBE accurately.
ISBE'S RESPONSE TO CORRECTIVE ACTION PLAN—October 16, 2015
Status of Corrective Action:  □Accepted □Not Accepted □Not Accepted
Basis for Partial Acceptance or Non Acceptance: An update is required
Required Elements of Corrective Action and Progress Report:
Please provide the most up to date listing of eligible immigrant ed. students identified in 2015-16 school year.
DISTRICT'S SECOND RESPONSE - January 15, 2016 & May 2, 2016
Description of Corrective Action (For each Corrective 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
OLCE in collaboration with the Office of Information Technology Services reviewed all registration records, for students currently enrolled in CPS, from 2014 prior. OLCE with ITS reviewed and updated records in the Student Information System.
OLCE will collaborate with ITS annually to update registration records for students. This process will enable CPS to accurately identify eligible immigrant education students.
List and Attach Evidence of Implementation of the Corrective Action
ISBE immigrant report printed from SIS Dec 2015
ISBE'S RESPONSE TO UPDATED CORRECTIVE ACTION PLAN - 5/27/2016
Status of Corrective Action: