Compliance Monitoring for English Learner (EL) Programming

Annual Statewide Meeting for Administrators Supporting English Learners

September 2026

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Agenda

- Introduction
- Federal & State Requirements
- Monitoring Components
- Useful SIS Reports for Monitoring
- Q&A

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Meet the Monitoring Team



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Meet the Monitoring Team (Continued)



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Vacant

Vacant

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Federal and State Requirements

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Federal Requirements

- **Title VI, Civil Rights Act of 1964**
  - Prohibits denial of equal access to education because of language minority students' limited proficiency in English
- **Equal Educational Opportunities Act of 1974**
  - Defines denial of equal educational opportunity as "failure by an educational agency to take appropriate action to overcome language barriers that impede equal participation by students in an instructional program"
- **Individuals with Disabilities Education Act (IDEA) of 1975**
  - Provides for free appropriate public education to eligible children with disabilities throughout the nation
  - Ensures special education and related services to those children
- **Title III of the ESEA of 1968 as amended by ESSA**
  - Establishes federal funding for supplemental services and programming to serve English learners
  - English learners (ELs) must be able to participate effectively in all programs and content areas.

Landmark Cases

- Lau v. Nichols, 414 U.S. 563 (U.S. Supreme Court, 1974)
  - Districts must take affirmative steps to overcome educational barriers faced by the non-English speaking students in the district

- Castañeda v. Pickard (648 F.2d 989, U.S. Court of Appeals, 5th Circuit, 1981)
  - Program for ELs should be:
    - Theory: Based on "a sound educational theory";
    - Practice: "Reasonably calculated to implement effectively the educational theory adopted by the school," with adequate resources and personnel; and
    - Results: Evaluated as effective in overcoming language barriers after a trial period.

- Plyler v. Doe, 457 U.S. 202, 102 S. Ct. 2382, 72 L. Ed. 2d 786 (1982)
  - The U.S. Supreme Court ruled that undocumented children have the same right as U.S. citizens and permanent residents to receive a free public education.

Illinois Codes

- Illinois School Code
  - Article 14C, Transitional Bilingual Education
  - Article 14D, Dual Language Education
  - Section 22-105, Safe Schools for All Act (Guidance on the Safe Schools for All Act)
- Illinois Administrative Code (Title 23)
  - Part 228: Transitional Bilingual Education
  - Part 680: State Seal of Biliteracy

Introduction

- ISBE is responsible for ensuring that Illinois Code requirements are met by Local Education Agencies (LEAs).
  - Illinois School Code Article 14C
  - 23 Illinois Administrative Code Part 228 Transitional Bilingual Education
- Monitoring helps ensure compliance with Title VI with regards to ELs.
- Monitoring of program requirements at the local level ensures compliance with regulations and assures the quality of the program and instructional delivery for English learners (ELs).

The Monitoring Process Overview

What to Expect

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The EL Monitoring Process Cycle – Initial Monitoring

ISBE Notifies District

- ISBE notifies the LEA via email with notification letter and monitoring documents.
- ISBE & the LEA schedule a virtual meeting to review the process.
- ISBE provides access to OneDrive for uploading evidence.
- LEA has **40 days** to compile evidence.

ISBE Desktop Review

- The Multilingual Department has **40 days** to review evidence submitted by the LEA.
- No evidence, unless requested by the Multilingual Department, will be accepted after the deadline.
- If the monitoring team has questions, they will reach out to the LEA for additional clarification or evidence.

ISBE On-site Visit(s)

- On-site agendas are to be submitted **two weeks** prior to visit(s).
- During the visit ISBE will:
  - Observe EL classrooms
  - Observe native language instruction (as applicable)
  - Conduct confidential 1:1 interviews
  - Check Title III materials/inventory (as applicable)

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The EL Monitoring Process Cycle – Initial Monitoring (Continued)

ISBE Issues Summary Report

- ISBE Multilingual Department provides the LEA with an EL Summary Report.
- Components are either fully implemented and compliant or not fully compliant.
- Components that are not fully compliant need to be addressed by the LEA.

LEA Develops Corrective Action Plan (CAP)

- ISBE encourages the LEA to schedule a virtual meeting to assist with CAP.
- LEA must develop corrective actions and write a narrative within Summary Report under "LEA's Response."
- LEA has 40 days to develop CAP.

ISBE Response to CAP

- Within 40 days, ISBE will respond to CAP.
- Each component will be fully accepted or not fully accepted.
- Items that are not fully accepted receive a narrative.
- ISBE will follow up on any items that were not fully implemented in the future.

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Follow-Up & Next Steps

- The LEA has the rest of the school year and the next full school year to implement corrective actions.
- ISBE will follow up with any item that received a rating of “not fully compliant” or “not fully implemented.”
  - If a CAP component is “accepted,” ISBE will still verify these components during the official follow-up to ensure the LEA is compliant and implementing the plan.
- There are a maximum of **two official follow-ups** before an LEA is eligible for a full initial EL monitoring cycle again.

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The Monitoring Process

Step by Step

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Step 1: Virtual Meeting

- The LEA and the ISBE Multilingual Department meet to go over the monitoring process and expectations.
  - Step by step review of the monitoring process
  - Explain the tools
    - LEA Self-Assessment Checklist, Excel Monitoring Template, Microsoft OneDrive
  - Respond to questions

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Step 2: Compiling and Submitting Evidence

- The LEA EL Program Monitoring Coordinator compiles and submits evidence to ISBE.
  - Evidence should be submitted by the due date.
  - Evidence required is outlined on LEA Self-Assessment.
  - Component 5.1 and 6 are recorded on the Excel Monitoring Template.
  - When in doubt, ask questions.
- All data and evidence should be from the **2025-26 school year.**
  - Staffing (Component 6) should be based on current school year.

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Step 3: ISBE Multilingual Desktop Review of Evidence

- After the deadline, ISBE conducts a preliminary review of evidence.
- All evidence must be submitted to OneDrive formatted correctly.
  - Word Documents or PDFs
  - No Google documents
- Unless specifically requested by the Multilingual Department, additional or late evidence will not be reviewed or accepted.

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Step 4: On-Site Visit(s)

- ISBE conducts an on-site visit.
- On-site visit(s) clarify the evidence and illustrate EL programming.
- While on site, ISBE will:
  - Conduct 1:1 confidential interviews with administrators, program directors, ESL/bilingual teachers, and parents of EL students
  - Briefly visit EL classrooms where students receive instruction or services (not an evaluation of instruction)
  - Check Title III materials (if applicable)
- **ISBE will not review evidence or files during the on-site visit(s).**

Step 5: ISBE Sends Summary Report

- Summary report issued to the program director and superintendent.
- Report will identify areas that are “fully implemented” or “not fully implemented.”
- Items that are not fully in place require corrective actions by the LEA.

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Step 6: LEA Develops a Corrective Action Plan

- ISBE encourages a virtual meeting to go over findings and clarify the Summary Report.
- The LEA develops corrective actions for any components that are not fully implemented.
- **The LEA's plan must be submitted via the Summary Report issued by ISBE.**
  - Plan is written under the sections "LEA's Response"
  - Relevant evidence submitted to OneDrive

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Step 7: ISBE Response to LEA CAP

- ISBE will “fully accept” or “not fully accept” the LEA’s plan of corrective actions.
  - **Fully accepted**: Corrective actions are acceptable and approved for implementation.
  - **Not fully accepted**: The corrective actions for that component do not fully address the necessary steps and/or actions to achieve compliance. The district may contact the ISBE Multilingual Department for guidance.
- The LEA does not need to resubmit items that are not fully accepted.
- During subsequent monitoring, the district will be responsible for ensuring necessary steps and/or actions have been taken to achieve compliance.

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Step 8: Follow-Ups

- ISBE will conduct up to two follow-ups.
  - The LEA has this school year and the 2027-28 school year to implement corrective actions before eligibility for a first follow-up.
- Follow-ups ensure components that were noncompliant are corrected and compliant.
- Progress and growth are important.

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Monitoring Resources for Districts

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Resources for Compliance Monitoring

- Resources for EL compliance monitoring can be found on the Multilingual/Language Development Department website:
  - Compliance Monitoring Manual for Districts
  - ISBE Monitoring Excel Template
  - Desktop/On-Site LEA Self-Assessment Tool
  - EL Cumulative Folder Cover Sheet

Monitoring Manuals

- The Monitoring Manuals give detailed step-by-step information about the monitoring process including:
  - The monitoring timeline
  - District responsibilities
  - On-site visit details
  - What to expect after initial monitoring

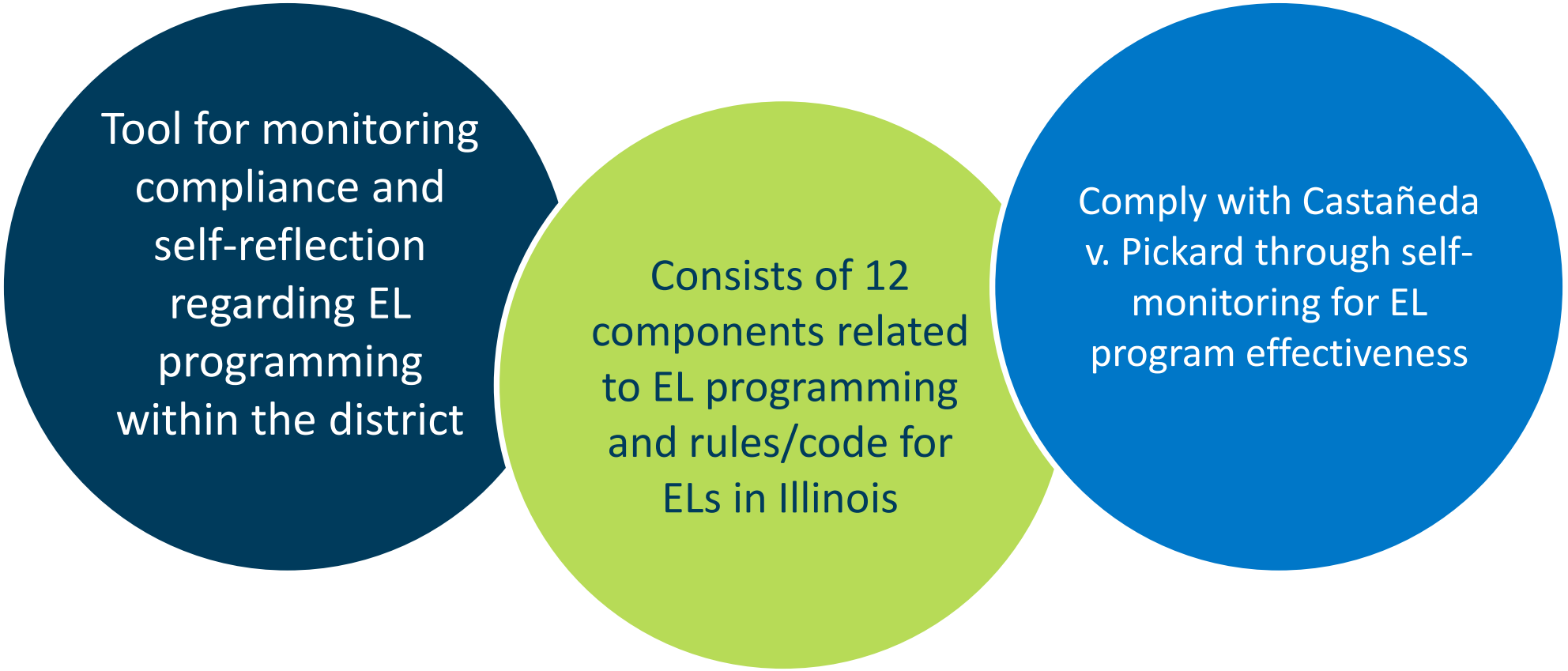
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EL Cumulative Cover Sheet

- The EL Cumulative Cover Sheet is **optional**.
- Covers all the documents required of an LEA for an EL student's cumulative folder
  - An LEA is still required to maintain student temporary files for **five years** even if a student is no longer with the district.
- Links to rules and School Code as well as other important documents in one location.

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The LEA Self-Assessment Tool



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Monitoring Components

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Compliance Monitoring Framework

- ISBE monitors EL programs via a structured system involving 12 key components to ensure:
  - LEA is compliant with state rules and regulations
  - LEA is compliant with federal rules and regulations

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QR Code for the LEA Self-Assessment



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The LEA Self-Assessment Components 1-6

Component 1:
Identification of Eligible Students and Equal Opportunities for All Students

Component 2:
Student Assessment

Component 3:
Providing Services to All Eligible/Placement

Component 4:
Program Components/Curriculum and Instruction

Component 5:
General Program

Component 6:
Staff Certification

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The LEA Self-Assessment Components 7-12

Component 7:
Professional Development

Component 8:
Parent and Community Participation

Component 9:
Communication with Parents/Parents' Rights

Component 10:
Student Records, Report Cards, and Data Management

Component 11:
Dually Identified Students (Special Education & English Learners)

Component 12:
Title III (For Districts with Title III Language Instruction Education Programs and/or Immigrant Student Education Programs)

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Data & Trends

EL Compliance Monitoring

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Monitoring Data from FY 2024 to Present

2023-24

- 50% were initial monitoring cycles, and 50% were follow-up cycles.
- 78% were on-site visits, and 22% were desktop.
- Of the initials:
  - 70% were elementary districts.
  - 30% were high school districts.
- Of the follow-ups:
  - 33% were elementary.
  - 22% were unit.
  - 45% were high school.

2024-25

- 63% were initial monitoring cycles, and 37% were follow-up cycles.
- 96% were on-site visits, and 4% were desktop.
- Of the initials:
  - 65% were elementary districts.
  - 26% were unit districts.
  - 9% were high school districts.
- Of the follow-ups:
  - 24% were elementary.
  - 35% were unit.
  - 41% were high school.

2025-26

- 72% were initial monitoring cycles, and 27% were follow-up cycles.
- 87% were on-site visits, and 13% were desktop.
- Of the initials:
  - 55% were elementary districts.
  - 21% were unit districts.
  - 15% were high school districts.
- Of the follow-ups:
  - 38% were elementary.
  - 15% were unit.
  - 46% were high school.

The Top 5 Most Common Findings in FY 2026

- Component 10.3
  - Maintaining an EL cumulative/temporary file
- Component 10.2
  - Report Cards for EL students
- Component 4.2
  - Full-time TBE programming
- Component 1.3
  - HLS is provided in the home language
- Component 9.2
  - Notice of Enrollment letters

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Questions?

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Multilingual Webpage

Assigned Consultant Listing

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