



Illinois
State Board of
Education

English Learner Program Desktop Monitoring Manual

Illinois State Board of Education

MULTILINGUAL/ LANGUAGE DEVELOPMENT DEPARTMENT

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INTRODUCTION

This document is a resource guide that supports monitoring of Local Education Agency (LEA) programs for English learners (ELs) by the Illinois State Board of Education (ISBE) Multilingual/Language Development Department (MD).

LEA EL program monitoring focuses on compliance with state and federal requirements for programming that is available to ELs. ISBE, together with the U.S. Department of Education and the Office for Civil Rights, is responsible for enforcing Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the grounds of race, color, or national origin by recipients of federal financial assistance. The Title VI regulatory requirements have been interpreted to prohibit denial of equal access to education because of a language minority student's proficiency in English. *Lau v. Nichols*, a U.S. Supreme Court case, requires LEAs to take steps to help ELs overcome language barriers and to ensure that they can participate meaningfully in educational programs. *Plyler v. Doe* is a landmark decision holding that states and/or LEAs cannot constitutionally deny students a free public education on account of their immigration status. Additionally, *Castañeda v. Pickard* mandates that programs for ELs must be (1) based on a sound educational theory, (2) implemented effectively with sufficient resources and personnel, and (3) evaluated to determine whether they are effective in helping students overcome a language barrier.

Furthermore, ISBE is charged with the responsibility of ensuring Illinois School Code ILSC 14C 1-13 and 23 Illinois Administrative Code Part 228 Transitional Bilingual Education requirements are being fulfilled by LEAs. The Every Student Succeeds Act of 2015 mandates that a State Education Agency monitor the implementation of Title III program requirements. Monitoring of Title III program requirements at the local level ensures compliance with regulations and assures the quality of the program and instructional delivery for ELs.

This document describes the selection criteria, the procedures LEAs must follow, evidence they must submit, and activities they must complete. The protocol includes timelines and provides tools to support the desktop review preparation process. Also, an LEA is expected to collaborate with the ISBE Multilingual/Language Development Department compliance monitor (MD monitor). Please refer to the initial monitoring email sent from ISBE for the name and contact information for your LEA's assigned MD monitor(s).

SELECTION CRITERIA

The Multilingual/Language Development Department selects LEAs for monitoring review using one or all the following criteria:

- **High Risk**
 - ✓ Sizeable EL population, but no EL Progress to Proficiency indicator score.
 - ✓ EL Progress to Proficiency indicator score lower than 40.
 - ✓ Disproportionality of dually identified students (special education and EL) difference of 10%-plus.
 - ✓ Review of Bilingual Service Plan shows an LEA demonstrated high risk for lack of compliance with regulations and procedures for ISBE review.
 - ✓ Parent refusals are disproportionately high.
 - ✓ EL-Evidence-Based Funding (EBF) dollars in excess of 300-plus percent are carried over from fiscal year 2021-22 to the most recent fiscal year (FY 2022-23)
- **Medium Risk**
 - ✓ EL Progress to Proficiency indicator score between 40 and 70.
 - ✓ Disproportionality of dually identified students (special education and EL) difference of 5 – 10%.
 - ✓ Review of Bilingual Service Plan shows an LEA is at medium risk for compliance to regulations.
 - ✓ EL-EBF funds between 100-299% are carried over from FY 2021-22 to the most recent fiscal year (2022-23).
- **Low Risk**
 - ✓ EL Progress to Proficiency indicator score 70-plus.
 - ✓ Disproportionality of dually identified students (special education and EL) difference of 5% and below.
 - ✓ Review of Bilingual Service Plan shows an LEA is at low risk for compliance to regulations.
 - ✓ EL-EBF funds less than 99% are carried over from FY 2021-22 to the most recent fiscal year (FY 2022-23).

Please note that Illinois districts with the largest numbers of ELs will or may be monitored more frequently; thus, the selection criteria will not necessarily apply.

Note: ISBE plans to monitor every district with EL students in the coming years, regardless of the risk criteria.

LEA - EL PROGRAM MONITORING COORDINATOR

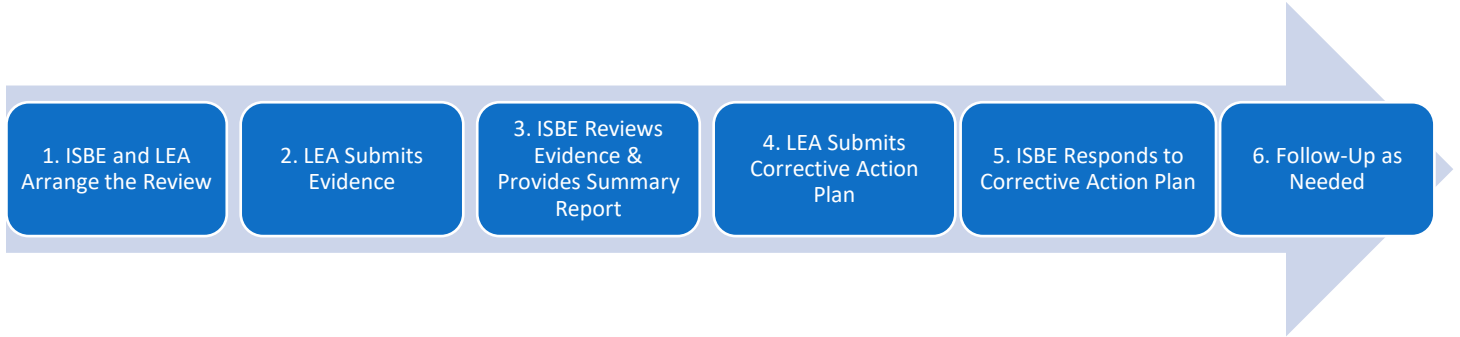
Typically, an LEA's EL program monitoring coordinator is the EL program director, bilingual coordinator, assistant superintendent, etc. Districts should assign an LEA-EL program monitoring coordinator for the ISBE Multilingual/Language Development Department monitoring desktop review. The program monitoring coordinator has the following responsibilities during the program monitoring:

- Participate in at least one virtual meeting with the MD monitor(s) that is arranged by ISBE to discuss the monitoring process and answer any questions.
- Compile and organize evidence for the desktop review detailed in the *LEA Self-Assessment Monitoring Report*.
- Assure that all evidence documents are properly labeled with the components that align with the *LEA Self-Assessment Monitoring Report*.

- Assemble and submit required documentation before or on the due date.
- Be available for questions and fully cooperate with the MD monitor.
- Respond to requests for follow-up information after the review.
- Coordinate development and submission of a Corrective Action Plan, if applicable.
- Coordinate and fully comply with any follow-up desktop review or onsite monitoring visit by ISBE.

FORMAT OF EL PROGRAM MONITORING

English learner program monitoring consists of six main steps:



Details of each step are provided on the following pages.

TIMELINE

Step	Actions	Time Period	Comments/questions
Arrange the Review	1) MD monitor sends notification letter to the LEA being monitored. 2) LEA – EL program coordinator is identified and then communicates with MD monitor.		
Submit Evidence	1) Compile and submit requested evidence through Microsoft Teams, including: <ul style="list-style-type: none"> i) LEA Self-Assessment Monitoring Report ii) ISBE Monitoring Template iii) Requested student documents iv) Other requested evidence 	40 calendar days from date of receipt of notification letter to evidence submission.	Contact MD monitor via email with any questions.
ISBE Reviews Evidence	1) ISBE receives evidence data from Microsoft Teams and questionnaires and starts desktop monitoring. 2) ISBE completes and sends the LEA a Summary Report.	40 calendar days from the date all evidence is submitted to send the Summary Report to LEA.	ISBE may request additional documentation or ask for clarification in relation to evidence the LEA has submitted.
LEA Submits Corrective Action Plan (CAP)	1) After receiving the LEA Summary Report, the LEA should submit a CAP to ISBE.	40 calendar days from date of receipt of Summary Report to submission of the CAP.	The LEA will be required to propose corrective action(s) for any components that were found to be not fully implemented in the Summary Report.
ISBE Responds to CAP	1) ISBE responds to the CAP that was submitted.	40 calendar days from receipt of CAP to submission of response.	The CAP will be reviewed and accepted by ISBE in accordance to statutes and regulations. Further

			information will be provided on areas that still need to be addressed.
Follow-up	1) ISBE will follow up with the LEA to assure implementation of the CAP.	LEA has one calendar year from ISBE's response to implement the CAP.	LEA can contact MD monitor throughout the process for any questions or concerns regarding the CAP.

STEP 1 – ISBE ARRANGES THE MONITORING DESKTOP REVIEW

An MD monitor will notify an LEA of an upcoming monitoring review by doing the following:

1. Send a notification letter pertaining to the upcoming EL program monitoring desktop review to the superintendent and the EL program director.

Once LEAs have been selected and notified of the monitoring desktop review, the MD monitor works with the LEA to arrange the review. The lead MD monitor and the LEA collaborate on the following activities:

1. The LEA and the MD monitoring team set up and participate in one virtual meeting. This is a courtesy to the LEA to discuss what is required to be submitted:
 - a. LEA Self-Assessment Monitoring Report.
 - b. ISBE Monitoring Template with required data.
 - c. All evidence and attachments that are properly labeled with the corresponding component submitted in One Drive (An invitation to One Drive will be shared with the LEA EL program coordinator by the MD monitor.)

The Self-Assessment Monitoring Report provides an opportunity for an LEA to evaluate its system's compliance with the requirements regarding this review. The self-assessment process provides an LEA with the necessary guidance to maintain high standards for compliance and program delivery. The LEA's EL program monitoring coordinator receives a fillable version of the Self-Assessment Monitoring Report, also available on the Multilingual/Language Development Department [website](#), in consultation with appropriate personnel, to the MD monitor via One Drive before or on the scheduled due date **(40 calendar days from receipt of notification of EL program monitoring)**.

STEP 2 – LEA SUBMITS EVIDENCE

The LEA compiles and organizes evidence based on the component elements in the Self-Assessment Monitoring Report and the ISBE Monitoring Template. **The ISBE Multilingual/Language Development Department team will review evidence that is submitted, provided it is submitted in the correct format.** Clear organization of materials will allow proper display of the LEA's Monitoring Report. It is crucial that all evidence must align and be labeled with the component elements that it corresponds to in the Monitoring Report (e.g., Component Element 1.1, 1.2, 1.3, and so on). **If there is evidence that is not labeled to which component element it belongs to, the MD monitor will reject all the files until the evidence is properly labeled.**

Listed below are a few suggestions for how to organize the materials:

- Upload evidence onto One Drive and rename the files with the component element (**e.g., 1.1 HLS**).
- Scan a print copy and upload it to One Drive as a PDF.
- A webinar for using One Drive for the EL program monitoring process can be found [here](#).

The LEA has 40 calendar days from receipt of the notification letter to compile evidence and submit evidence.

STEP 3 – ISBE REVIEWS EVIDENCE AND PROVIDES SUMMARY REPORT

The MD monitor will begin to review evidence after the deadline and after all required documents have been received. The desktop review timeframe will depend on the size of the LEA, the scope of the EL program, evidence provided and any findings under investigation. The MD monitor will draft a Summary Report and send it to the LEA. The initial review will not exceed 40 calendar days.

STEP 4 – LEA SUBMITS CORRECTIVE ACTION PLAN

After the desktop review, the MD monitor sends a Summary Report to the LEA’s EL program monitoring coordinator and superintendent. **The LEA must respond to any findings marked as not fully implemented with a Corrective Action Plan (CAP) within 40 calendar days of receipt of the Summary Report.** The CAP outlines the LEA’s corrective actions to be implemented and may provide evidence of corrective actions already completed (to be submitted via One Drive).

STEP 5 – ISBE RESPONDS TO CORRECTIVE ACTION PLAN

The MD monitor will review the CAP to determine if appropriate corrective actions have been developed and will inform the LEA of the status of its compliance in a response letter. In the letter, the MD monitor either fully accepts or does not fully accept the LEA’s CAP. The LEA status may be designated on the CAP elements as follows:

Fully Accepted -- Corrective actions approved for implementation.

Not Fully Accepted -- Corrective actions are not approved for implementation.

MD monitors are available upon request to work with each LEA to recommend corrective actions. Some findings may require more than 40 days to bring into compliance. The LEA and the MD monitors will discuss appropriate deadlines for completion.

STEP 6 – FOLLOW-UP AS NEEDED

ISBE will respond to the Corrective Action Plan within 40 calendar days and will give the LEA one calendar year before following up to assure implementation of the Corrective Action Plan.

APPENDIX A CHECKLIST TO PREPARE FOR THE REVIEW

This checklist is meant to support the LEA in the completion of each step of the review process. It also provides an overview of activities to be completed in preparation for, during, and after the review to ensure a successful review process. This should not be submitted to the ISBE Multilingual/Language Development Department.

Step 1 – Compiling Evidence

- Compile evidence for each Component Number in the *LEA Self-Assessment Report* in consultation with appropriate personnel.
- Organize evidence:
 - Organize your evidence by component.
 - Use the *LEA Self-Assessment Monitoring Report* checkboxes to see what documents/evidence are appropriate.
 - Be prepared to make additional copies of evidence, if requested.

Step 2 – Follow Up

- Provide further documentation to the Multilingual/Language Development Department upon request.
- Respond to report findings and participate in the development of the Corrective Action Plan.

Please contact MD monitor(s) that have been assigned to your LEA if you have any questions about the Summary Report.