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January 17, 2017

Dr. John Thein – Superintendent
360 Colborne St.
St. Paul, MN 55102-3299

Dear Interim Superintendent Thein:

Title III services are governed by the Elementary and Secondary Education Act (ESEA) of 1965 as amended under the No Child Left Behind Act of 2001 (NCLB), Public Law 107-110. As a state grantee, Minnesota Department of Education (MDE) is required to monitor funded activities to assure compliance with federal requirements and progress toward achieving the goals of the authorizing statute. Each local educational agency (LEA) receiving ESEA and state funds is under the general supervision of the MDE. In order to evaluate these programs, MDE's staff has the authority to review all relevant information necessary to enable it to carry out oversight responsibility.

On October 31 - November 10, 2016, a team from the Minnesota Department of Education's (MDE) Division of Student Support reviewed Saint Paul Public School District's (SPPS's) language instructional educational program (LIEP) for English Learners (ELs). Enclosed is a report based upon that review.

MDE is committed to working closely with LEAs to provide the best educational programs possible. The MDE EL team, part of the Division of Student Support, uses a review process that encompasses state EL program requirements and is aligned to the requirements set forth in Title III of the No Child Left Behind (NCLB) Act of 2001. Prior to and during the onsite review, the MDE EL team conducted a number of activities to verify compliance with critical elements. Such activities included meeting with administrative staff, interviewing teachers, students and parents, as well as observing classrooms.

The enclosed report contains a description of the scope of the review as well as recommendations and findings. The report is based on the EL Program Review Critical Elements. Saint Paul Public School District is required to develop and implement a Corrective Action Plan (CAP) to address each finding of non-compliance in the report and achieve compliance. The CAP should include the following items:

- a cover letter stating the purpose of the communication and introducing which critical elements have been addressed in the CAP,
- clearly labeled critical elements (that were findings in the report) and numbers,
- a list of action steps necessary to correct the compliance (written as SMART Goals),
- an appendix of documentation specifically requested to address the critical element described under "Corrective Action Required", and
- the projected date when the corrective action will be completed and compliance achieved (not to exceed one year from the date of the report) and person(s) responsible.

The content of the CAP is to be submitted in a table format with the following header row:

Critical Element	Corrective Action Required	Corrective Action to be taken	Date of Action Completion	Person(s) Responsible
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Please mail the CAP to Julie Chi at the address in the header of this letter, or it may be emailed to julie.chi@state.mn.us within 45 business days of the receipt of this letter.

The MDE EL team would like to commend the staff at Saint Paul Public School District for the hard work prior to and during the visit in gathering materials, setting up a schedule, and providing access to information in a timely manner.

The monitoring process emphasizes a partnership between the LEA and MDE to identify areas in need of training, technical assistance, and corrective action. MDE is committed to supporting LEAs in their efforts to educate ELs and meet state and federal laws. MDE will provide technical assistance as needed and may conduct a follow-up site visit to confirm compliance.

We look forward to working further with staff members in any follow up activities and in assisting them to improve the delivery of the language instructional education program for ELs. Questions may be directed to Julie at julie.chi@state.mn.us or 651-582-8444.

Sincerely,



Leigh Schleicher, Supervisor
Division of Student Support

Enclosures



Elementary and Secondary Education Act (ESEA)

Title III Monitoring Review

Compliance Report

Title III: Language Instruction for English Learner and Immigrant Students

Date Issued: January 17, 2017

Local Education Agency Reviewed: Saint Paul Public School District

Dates of Review: October 31 - November 10, 2016

Report Prepared By:

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Summary of English Learner (EL) Program Review

Saint Paul Public School District

October 31 - November 10, 2016

Scope of the Review:

This report contains findings of the on-site monitoring review of the Title III English learner (EL) education program in Saint Paul Public School District. A team from the Division of Student Support at the Minnesota Department of Education (MDE) conducted the review on October 31 - November 10, 2016. This was a comprehensive review of the district's administration and implementation of the EL program including Title III of the No Child Left Behind (NCLB), Part A.

In conducting this review, the MDE EL team carried out a number of activities. The MDE EL team analyzed evidence of implementation and effectiveness of the language instruction educational program (LIEP) and professional development processes established by the district. Furthermore, the MDE EL team evaluated compliance with fiscal and administrative oversight activities required of the local education agency (LEA), St. Paul Public School District. During the onsite visit, the MDE EL team observed instruction in classrooms; interviewed staff, students, and parents; and met with administrative, support, and instructional staff as follows:

Activity		Number Completed
Interviews	Administrative Staff	22 at schools; 15 at district office
	Instructional Staff	98
	Non-instructional Staff (Liaisons, Counselors, Specialists, etc.)	24
	Parents	13 parents/groups of parents
	Students	40 students/groups of students
Observations	Classrooms	87
	Site Tours and Walkthroughs	22 schools

MDE recognizes the LEA's efforts to improve the language instruction educational program for ELs and its commitment to a high quality management process. MDE is committed to working further with the district on follow-up activities to improve the language instructional education program for ELs.

Review of Critical Elements:

As part of MDE's commitment to supporting school districts in improving academic achievement, the following report, aligned with the *English Learner (EL) Onsite Program Review Critical Elements*, found in entirety on MDE's website at <http://education.state.mn.us/MDE/SchSup/EngLearnSup/index.html>, include findings and recommendations that may further improve the effectiveness of Saint Paul Public School District's LIEP. Items labeled "No finding" require no further action, based on the current situation of the district at the time of the visit. An item labeled "Finding" requires a corrective action. Findings labeled "Recurring" were identified during MDE's review in 2010. While MDE closed the 2010 findings based on Saint Paul Public School District's actions, these same issues were identified again in 2016.

Minnesota Department of Education (MDE)

Title III Review Report

Read and respond to any “Finding/Corrective Action Required” within 45 business days.

Critical Element 1 Student Identification and Reclassification, Program Placement and Exit: LEAs must identify and place ELs in appropriate programs.

Element 1.1 The LEA documents uniform determination of home language.

MDE Response: *No findings at this time – MDE recognizes improvements made to the home language survey since the 2010 review.*

Recommendation: Evidence provided included both a Home Language Survey and an intake form, both asking for home language. MDE recommends that the district not request this information in duplication.

Element 1.2 The LEA uses a valid English language development (ELD) assessment and developmentally appropriate measures to identify and place English learners in a program.

MDE Response: *No findings at this time*

Recommendation: Placement testing will soon be moving from the WIDA W-APT to the WIDA Screener. It is recommended that the district make concrete plans for moving forward. With the new version being online, there may be greater flexibility and we recommend revisiting procedures and timelines.

Element 1.3 The LEA uses English language proficiency assessment scores, including oral academic language and teacher judgment, to exit and reclassify English learners.

MDE Response: *Findings - See explanation and required corrective action below*

Recurring Finding 1.3.1: Evidence was provided that exit and reclassification procedures are not fully understood by stakeholders across the district and that the term “monitoring” is being used inconsistently throughout the district. According to the US Department of Education, and taken from feedback provided by MDE during the Plan of Service Review, *monitoring* refers to the federal requirement that states track English Learners for two years following reclassification in order to ensure that students are making progress. During this time, students no longer take the WIDA ACCESS test (as they have been reclassified as non-EL) however, their scores on MCA content tests continue to impact the EL subgroup. The Office for Civil Rights often refers to *tracking* as what a district might do to watch student progress after exiting a student but prior to reclassification. While communication goes out to some stakeholders, evidence was provided that relatively few stakeholders receive the information in a timely and accessible manner.

Corrective Action Required: The LEA must submit written procedures for effectively communicating exit and reclassification information to all stakeholders (including staff members, family and community members) in a timely and accessible manner. The LEA must clarify with all staff that tracking of student progress happens *after* a student is exited from EL programming.

Element 1.4 The LEA identifies English learners with limited or interrupted formal education (SLIFE).

MDE Response: *No findings at this time*

Recommendation: Continue to refine the SLIFE identification process.

Element 1.5 The LEA communicates with parents regarding their children's participation in the language instruction education program in an understandable and uniform format and in a primary language of the pupils.

MDE Response: *No findings at this time*

Recommendation: MDE recommends continuing to find means to communicate information to parents regarding programming and second language acquisition using multiple modes including expanding language options and accessibility. Additionally, ensure that staff are informed of these processes.

Element 1.6 The LEA parent notice includes [all required elements (See subpoints "a" through "h")].

MDE Response: *Findings - See explanation and required corrective action below*

Finding 1.6.1: Subpoint "a" ("The reasons why the child has been placed in the program") is unclear as the letter simply states "based on a combination of the Home Language Survey (HLS), and your student's most recent test scores" and does not specify what about the HLS identified the student as an English Learner.

Finding 1.6.2: Subpoint "b" ("The child's level of English proficiency, how the level was assessed and the child's current level of academic achievement") is incomplete. There is no explanation of when the test was taken, the student's domain levels are not listed nor is the student's current level of academic achievement provided.

Corrective Action Required: The district must submit a revised parent letter to MDE. The revision must include the pieces missing as specified in findings 1.6.1 and 1.6.2. Once the revised parent letter is confirmed to contain the missing subpoints, the district should begin its use it immediately.

Critical Element 2 Appropriate Programs: LEAs must implement high-quality language instruction educational programs for English learners and evaluate their effectiveness.

Element 2.1 Programs for English learners address English language development (ELD) standards and [comply with items "a" and "b"].

MDE Response: *Finding – See explanation and required corrective action below*

Finding 2.1.1: The LEA provided evidence that effective implementation of ELD standards is inconsistent across the district. While evidence provided demonstrates some training on the ELD standards, other evidence reveals that few people received such training. Secondary-level syllabi provided in the evidence binder do not demonstrate understanding of ELD standards implementation.

Corrective Action Required: The LEA must submit to MDE evidence that Minnesota's ELD standards are reflected in the curriculum scope and sequence and the professional development plans for all staff working with English Learners.

Element 2.2 The LEA has in place a written plan of service that [complies with “a” through “c”].

MDE Response: *No findings at this time*

Recommendation: MDE recommends broader inclusion of stakeholders in future revisions of the plan of service. The plan's intent is to serve as a basis for communication with district stakeholders regarding service for English Learners.

Element 2.3 The programs and activities are evaluated to determine effectiveness [compliant with items “a” through “c”].

MDE Response: *Finding – See explanation and required corrective action below*

Finding 2.3.1: No evidence was provided that evaluation of the EL program has been done.

Corrective Action Required: The district must submit to MDE an evaluation plan and timeline for evaluation implementation to include Title III and EL programs and activities as part of the district's overall evaluation plan. In addition, the LEA must submit to MDE the Title III program evaluation for 2016-2017 on or before September 15th, 2017.

Element 2.4 English language programs are coordinated with other relevant programs and services for maximal use of resources.

MDE Response: *No findings at this time*

Recommendation: No recommendations at this time

Element 2.5 Students receive all services for which they are eligible and have access to programming in which all other children are eligible to participate.

MDE Response: *Finding – See explanation and required corrective action below*

Recurring Finding 2.5.1: Evidence was provided that students assessed at WIDA levels 3-5 are not served at all sites.

Corrective Action Required: The LEA must submit to MDE written procedures to ensure ELD service that increases students' English language proficiency is provided to all students identified as English Learners in the district.

Comment: The LEA provided evidence that while related policies exist at the district level, knowledge at the building level of practices around identification of special education for students identified as English Learners is inconsistent. It is believed by staff that a special education identification wait time exists ranging from 2 interventions of 6-8 weeks to 2-3 years of wait time. Delaying special education services may contribute to delayed progress in all academic areas, including English language development.

Recommendation: It is recommended that the LEA disseminate information about processes for identification of special education for English Learners to ensure consistent practice and implementation across the district.

Element 2.6 If applicable, the LEA has implemented specific programs for immigrant children and youth.

MDE Response: *Not applicable at this time*

Recommendation: The district did not receive immigrant funds in 2016-2017. MDE recommends a thorough review of procedures to identify immigrant students in order to ensure quality of data and inclusion in the Title III immigrant program.

Critical Element 3 Appropriate Staff and Professional Development:
LEAs must utilize appropriate staff to serve ELs.

Element 3.1 The LEA assures that ELs have access to teachers who are licensed and highly qualified in their teaching assignment.

MDE Response: *Finding – See explanation and required corrective action below*

Finding 3.1.1: Evidence was provided that some teachers of Sheltered Content courses are not appropriately licensed.

Corrective Action Required: The district must submit evidence of a plan to review its sites' staffing for English Learners and a plan to provide appropriate staffing for English Learners at sites that are out of compliance. Additionally, the plan must include analysis by site of staff who are working to obtain appropriate licensure as well as completion timelines.

Recommendation: Evidence was provided that EL staffing allocations are not transparent. MDE recommends developing written policies around allocation of EL staff and clearly disseminating it to district stakeholders.

Element 3.2 The LEA assures that all teachers in any language instruction education program for English learners are fluent in English and in any other language used for instruction, including having written and oral communication skills.

MDE Response: *No findings at this time*

Recommendation: No recommendations at this time

Element 3.3 The LEA assures that instructional paraprofessionals work under the supervision of a certified or licensed teacher including individuals employed in the language instruction education program.

MDE Response: *No findings at this time*

Recommendation: No recommendations at this time

Element 3.4 Professional development (PD) related to EL education is [based on factors “a” through “j”].

MDE Response: *Findings – See explanation and required corrective action below*

Finding 3.4.1: Insufficient evidence was provided to support subpoint “a” (that professional development is based on a comprehensive needs assessment...).

Recurring Finding 3.4.2: Little evidence was provided to support that core content teachers and administrators receive EL training (see Subpoint “c”). It is unclear who was provided professional development opportunities found in the evidence binder.

Finding 3.4.3: The LEA provided evidence that training around EL education does not include professional development directly relevant to culturally responsive pedagogy that enables students to master content, develop skills to access content, and build relationships (See subpoint “h”).

Finding 3.4.4: The LEA provided evidence that it does not provide PD of sufficient intensity, frequency and duration to have a lasting impact on teacher performance (See subpoint "i").

Corrective Action Required: The LEA must submit to MDE evidence that the district's overall professional development plan includes PD on EL and culturally responsive pedagogy – based on a comprehensive needs assessment – provided for all staff and of sufficient frequency and duration to have a lasting impact on teacher performance.

Critical Element 4 Family and Community Engagement: LEAs must involve family and community members in the planning, development and implementation of the language instruction education program.

Element 4.1 The LEA has implemented an effective means of outreach to parents of English learners, [informing them how they can do items "a" through "c"].

MDE Response: *No findings at this time - MDE recognizes efforts made to provide more opportunities for family and community engagement since the 2010 review.*

Recurring Recommendation: The MDE recommends that the LEA review its history of parental involvement and consider ways it could reach out to a broader range of parents.

Element 4.2 The LEA sends parents of English Learners notices of such meetings in a language and format accessible to them.

MDE Response: *Finding – See explanation and required corrective action below*

Finding 4.2.1: Evidence was provided that translated notices and interpretation is not happening consistently across the district.

Corrective Action Required: The LEA must submit to MDE a copy of its language access policy and copies of event notifications/flyers in multiple languages. If it does not have such a policy, the LEA must submit a timeline in which it is able to provide the policy.

Element 4.3 The LEA provides training to enable teachers and principals to involve parents in their child's education, especially parents of English learners and immigrant children.

MDE Response: *No findings at this time*

Recommendation: It is recommendation that such trainings be made more accessible and accommodating to principals' and teachers' schedules.

Element 4.4 The LEA involves family and community in the planning, development and implementation of programs for English Learners and the pursuit of community support to accelerate the academic and native literacy and achievement of ELs with varied needs, from young children to adults.

MDE Response: *No findings at this time*

Comment: The district provided some evidence of Parent Advisory Committees receiving feedback from parents on EL identification (the Home Language Survey) and Parent Academies' work to solicit parent feedback on the development and implementation of programs for ELs with regard to native language literacy.

Recommendation: It is recommended that the LEA utilize methods to increase parent participation in the committees and academies while focusing on the planning, development and implementation of programs for English Learners, including those with regard to native literacy development, from a diverse range of EL parents at multiple sites in the district

Element 4.5 World's Best Workforce planning addresses the needs of English learners and their families as outlined in Minnesota state statutes.

MDE Response: *No findings at this time*

Recommendation: No recommendations at this time

Critical Element 5 Accountability Requirements: LEAs must adhere to state and federal accountability requirements.

Element 5.1 The LEA ensures that all English Learners are annually assessed for their English language and native language development, if the native language is used for instruction, and assessment is in accordance with state and federal requirements.

MDE Response: *Finding – See explanation and required corrective action below*

Finding 5.1.1: While evidence was provided that the LEA annually assesses ELs for English language development, the LEA provided no evidence of an assessment or assessment data collected for native language (i.e. target language) development in programs where the native language is used for instruction.

Corrective Action Required: The LEA must develop and submit a plan to acquire/create, use and maintain results of, reliable language development assessments for all languages of instruction at its sites. See the following link for suggestions on available assessments: <http://education.state.mn.us/MDE/EdExc/StanCurri/K-12AcademicStandards/WorldLang/>

Element 5.2 The LEA, which has not met AMAO for the preceding four or more years, has a Modification Plan on site and is implementing the modification plan accordingly.

MDE Response: *No findings at this time*

Recommendations: *No recommendations at this time*

Element 5.3 Policies and procedures related to individual student data collection, which adhere to state and federal requirements, are in place.

MDE Response: *Finding – See explanation and required corrective action below*

Finding 5.3.1: The LEA provided evidence that it does not have a policy related to individual student data collection.

Corrective Action Required: The LEA must submit to MDE the final draft of the student data collection policy which it reported it is in the process of developing.

Recommendation: MDE recommends providing more guidance around what sites should keep in their students' cum folders so that there is consistency across the district.

Element 5.4 For Title III Immigrant Children and Youth, LEA has a data collection procedure to ensure that the immigrant student count submitted to MDE includes only eligible immigrant students.

MDE Response: *No findings at this time*

Recommendation: As per critical element 2.6, the district did not receive immigrant funds in 2016-2017. MDE recommends a thorough review of procedures to identify immigrant students in order to ensure quality of data and inclusion in the Title III immigrant program.

Critical Element 6 Fiscal Requirements: LEAs must adhere to state and federal fiduciary requirements.

Element 6.1 State and Federal funds are utilized to benefit English learners. Title III funds are not used to provide services that are required to be made available under state or local laws or other federal laws; Title III funds are not used to provide services that were provided in the previous year with state, local or other federal funds.

MDE Response: *Findings – See explanation and required corrective action below*

Finding 6.1.1: Evidence was provided that bilingual paraprofessionals are funded through ELL General funds and Title III funds. However, it is unclear how Title III is supplementing, not supplanting, General funds in this regard.

Corrective Action Required: The LEA must submit evidence that Title III funds are not being used to fund activities that are currently being funded by state or other federal dollars, as related to bilingual paraprofessionals.

Comment: Additionally, evidence was provided that bilingual paraprofessionals are performing duties outside of supporting language acquisition/development and cultural adjustment outside the district policy disallowing “non-instructional duties such as breakfast, lunch, bus, recess in excess of 30 minutes per day”. Moreover, the language of the bilingual paraprofessionals is not always aligned with the needs of the school.

Recommendation: It is recommended that the district review 1) the amount of time bilingual paraprofessionals are spending on duties outside of instruction and adjust to fit the district’s policy to ensure their work focuses on supporting the language and cultural needs of ELs and 2) the language/culture needs at each school and allocate bilingual paraprofessionals based on need

Element 6.2 Fiscal management procedures ensure state and federal requirements are met including appropriate time and effort record keeping, meeting the two percent (2%) administrative cap, and that purchased equipment is properly labeled and inventoried.

MDE Response: *No findings at this time*

Recommendation: No recommendations at this time

Critical Element 7 Nonpublic School Participation in Language Instruction Education Program: The LEA must include nonpublic school participation in the language instruction education program.

Element 7.1 The LEA annually consults with nonpublic schools to determine services for English learners that are located in the geographic area served by the LEA. Consultation includes [See items a – i].

MDE Response: *Findings – See explanation and required corrective action below*

Finding 7.1.1: Evidence was provided that while consultation is happening, meaningful consultation in the areas of critical element 7.1.c) *What services will be offered to meet the language development needs of ELs as well as professional development needs of their teachers and other educational personnel;* and 7.1.d) *The size and scope of the services to be provided to the nonpublic school children and educational personnel* is not happening.

Corrective Action Required: The LEA must submit to MDE a plan to provide meaningful consultation to its non-public schools.

Recommendation: Work with MDE to review guidelines around using Title III funds to support F1 Visa holders. The LEA should review its form as it appears the name of a previous consultant is still listed on a form dated recently.

Element 7.2 The LEA ensures equitable participation in the Title III program [in accordance with a-c].

MDE Response: *Findings – See explanation and required corrective action below*

Finding 7.2.1: Evidence was provided that a process for oversight of the items in this critical element ("a" and "b") does not exist.

Corrective Action Required: The LEA must develop and submit a process for oversight of the following sub elements: a) the LEA assesses, evaluates and addresses the needs and progress of public and nonpublic school students and educational personnel on a comparable basis; and b) the LEA provides an equitable amount of services to students and educational personnel with similar needs.

Element 7.3 The LEA ensures use of Title III funds is in alignment with [items a - c].

MDE Response: *No findings at this time*

Recommendation: It is recommended that St. Paul Public Schools provide more guidance to nonpublics on ways to use the funds to effectively support ELs at the nonpublic while remaining compliant with state and federal laws and regulations.