

**Gloucester**

**Tiered Focused Monitoring Report**

**Onsite Dates:** **December 14-15, 2022**

**Date of Final Report:** **01/31/2023**



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Commissioner of Elementary and Secondary Education

During the 2022-2023 school year, Gloucester participated in a Tiered Focused Monitoring Review conducted by the Department’s Office of Language Acquisition (OLA). The purpose of the Tiered Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on English Learner Education.

District/charter schools are reviewed every six years through Tiered Focused Monitoring. There are 12 ELE criteria that target implementation of the requirements related to ELE programs under state and federal law and regulations:

ELE 1: Annual English Language Proficiency Assessment

ELE 2: State Accountability Assessment

ELE 3: Initial Identification of ELs and FELs

ELE 5: ELE Program and Services

ELE 6: Program Exit and Readiness

ELE 7: Parent Involvement

ELE 8: Declining Entry to a Program

ELE 10: Parental Notification

ELE 13: Fallow-up Support

ELE 14: Licensure Requirements

ELE 15: Professional Development Requirements

ELE 18: Records of ELs

Tiered Focused Monitoring allows for differentiated monitoring based on a district’s level of need, the Tiers are defined as follows:

Districts in Tiers 1 and 2 have been determined to have no or low risk:

* Tier 1: Data points indicate no concern on compliance and performance outcomes – meets requirements.
* Tier 2: No demonstrated risk in areas with close link to student outcomes – low risk.

Districts in Tiers 3 and 4 have demonstrated greater risk:

* Tier 3: Areas of concern include both compliance and student outcomes – moderate risk.
* Tier 4: Areas of concern have profound effect on student outcomes and ongoing compliance – high risk.

The monitoring process differs depending on the tier assigned to the district as well as the district’s previous tier assignment.

The review process includes the following:

1. Self-Assessment
* District reviews English Learner Education documentation for required elements including document uploads.
* District reviews a sample of English learner (EL) student records selected across grade levels and EL focus areas such as opt-out students, former ELs and students and/or parents who need translation and/or interpretation.
* Upon completion of these two internal reviews, the district’s self-assessment is submitted to the Department for review.
1. Verification
* Review of EL student records: The Department may select a sample of student records and request certain documentation to be uploaded to the WBMS as evidence of implementation of the ELE criteria.
* Review of additional documents for English Learner Education
* Surveys of parents of ELs: Parents of ELs are sent a survey that solicits information regarding their experiences with the district’s implementation of English Learner Education program(s), related services, and procedural requirements.
* Interviews of staff
* Classroom observations as applicable
* Parent and student focus groups as applicable

**Report:**

Within approximately 20 business days of the onsite visit, the onsite chairperson will forward to the superintendent or charter school leader the findings from the Tiered Focused Monitoring Review. Within 10 business days of receipt of the findings, the district reviews and comments on the findings for factual accuracy before they are finalized. After the report is finalized, districts develop a Continuous Improvement and Monitoring Plan (CIMP) for any criteria receiving a rating of "Partially Implemented," "Not Implemented," and “Implementation in Progress.” The CIMP outlines an action plan, identifies the success metric, describes the measurement mechanism and provides a completion timeframe to bring those areas into compliance with the controlling statute or regulation. District and charter schools are expected to incorporate the CIMP actions into their district and school improvement plans, including their professional development plans.

# **DEFINITION OF COMPLIANCE RATINGS**

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| **Implemented** | The requirement is substantially met in all important aspects. |
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| **Implementation in Progress** | This rating is used for criteria containing new or updated legal requirements and means that the district has implemented any old requirements contained in the criterion and is training staff or beginning to implement the new requirements in such a way that the onsite team anticipates that the new requirements will be implemented by the end of the school year. |
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| **Partially Implemented** | The requirement, in one or several important aspects, is not entirely met. |
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| **Not Implemented** | The requirement is totally or substantially not met. |
| **Not Applicable**  | The requirement does not apply to the school district or charter school. |

For more information on the Tiered Focused Monitoring approach, please visit the Department’s [website](https://www.doe.mass.edu/ele/cpr/default.html).

Gloucester

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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|  | **English Learner Education Requirements** |
| **IMPLEMENTED** | ELE 1, ELE 2, ELE 6, ELE 8, ELE 10, ELE 13, ELE 15 |
| **PARTIALLY****IMPLEMENTED** | ELE 3, ELE 5, ELE 7, ELE 14, ELE 18 |

| **Improvement Area** **1** |
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| **Criterion:** ELE 3 - Initial Identification of ELs and FELs |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Documentation indicates that the district does not screen Pre-kindergarten students to determine if they are English learners. The Department concludes that the district does not properly identify students who need English language support and the current initial identification procedures and practices are not in compliance with 603 CMR 14.02(1) that requires districts and charter schools to establish procedures in accordance with the Department guidelines. |

| **Improvement Area 2** |
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| **Criterion:** ELE 5 - Program Placement and Structure |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** The Department conducted an on-site visit to the school district to evaluate the effectiveness of programs serving English learners as required by G.L. c. 71A, § 7A. A review of data as a part of the evaluation of the district's ELE program indicated that English learners do not demonstrate sufficient growth in English language acquisition and the ELE program needs improvement to promote and support the rapid acquisition of English language proficiency by ELs. The compliance issues identified by the Department are as follows:The district has procedures in place to identify ELs who do not meet English proficiency benchmarks and a process to identify the areas in which identified ELs need improvement and establish personalized goals for attaining English proficiency; however, interviews indicated that teachers who work with students who have not met their English language proficiency benchmarks do not plan their lessons to support students' personalized goals and there is not a process to get parental input during the process or to track and assess the progress of ELs in the identified areas in need of improvement or to review resources and services available to identified English learners that may assist said learners in the identified areas of improvement as it is required by M.G.L 71 A §11Observations and interviews also indicated that content instruction was mostly delivered by multilingual paraprofessionals who provide direct translation of the content instruction at middle and high schools instead of sheltering the content to make it accessible for English learners. As a result, SEI strategies are not always used to make content comprehensible for English learners at low proficiency levels, SEI teachers rely on the direct translation provided in SEI classes and students focus on the translator rather than the teacher and other instructional activities in the classroom. While leveraging native language and supporting translanguaging in moderation are important strategies, relying on direct translation too much at the expense of incorporating sheltering strategies does not promote the rapid learning of English nor grade level understanding of the content areas in SEI classes.Interviews with ESL staff indicated that the district does not have an ESL curriculum implemented with fidelity that is integral to an effective ELE program in which ELs of all grades and proficiency levels become English proficient at a rapid pace. While the district has the flexibility to choose the appropriate setting and method of ESL instruction as part of their SEI program, the ESL instructional focus must include at a minimum unit plans of ESL curriculum that integrate the WIDA standards. Academic tutoring of content subjects or sheltering the content for ELs in a regular education classroom as a part of a push-in model is not a substitute for the ESL component of SEI programs.A review of the district's data submitted to the Department's Student Information Management System (SIMS) indicated that while most English learners are enrolled in an ELE program, some English learners show as not enrolled in an English language education program. |

| **Improvement Area 3** |
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| **Criterion:** ELE 7 - Parent Involvement |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** ? A review of documentation submitted by the district indicates that translations are not always provided for parents who have requested documents in languages other than English. Furthermore, when language assistance is provided, there are not clear policies and procedures in place to ensure that competent, appropriately trained staff or outside resources provide translation and interpretation. Appropriate and competent translators or interpreters have proficiency in target languages; ease of written and oral expression; knowledge of specialized terms or concepts; expertise in the content being interpreted; as well as be trained on their role, the ethics of interpreting and translating, and the need for confidentiality. The district needs to ensure that its interpreters are qualified to provide services that meet its legal obligations. Therefore, the Department has determined that the district does not always provide effective language assistance to parents whose preferred language is not English and therefore, does not always meet the obligation to communicate effectively with parents to include them in matters pertaining to their children's education.? Interviews and documentation indicated that the district does not have an English Learner Parent Advisory Council as required in M.G.L. c. 71A, § 6A. |

| **Improvement Area 4** |
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| **Criterion:** ELE 14 - Licensure Requirements |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of the relevant SEI Endorsement data indicated that most core academic and career vocational technical teachers assigned to provide sheltered English instruction to English learners hold the SEI Teacher Endorsement, but some do not. |

| **Improvement Area 5** |
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| **Criterion:** ELE 18 - Records of ELs |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of the documents requested from the district indicated that the district does not consistently keep all the required documents in students' EL records. |