

**Lowell**

**Targeted and Focused Monitoring Report**

**Onsite Dates:** **March 18, 2024 - May 5, 2024**

**Date of Final Report:** **05/14/2024**



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Commissioner of Elementary and Secondary Education

During the 2023-2024 school year, Lowell participated in a Targeted and Focused Monitoring Review conducted by the Department’s Office of Language Acquisition (OLA). The purpose of the Targeted and Focused Monitoring Review is to monitor compliance with regulatory requirements focusing on English Learner Education.

District/charter schools are reviewed every six years through Targeted and 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

The monitoring process differs depending on the thorough data analysis the Department conducts.

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 Targeted and 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 Targeted and Focused Monitoring approach, please visit the Department’s [website](https://www.doe.mass.edu/ele/cpr/default.html).

Lowell

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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

| **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:** The Department conducted a review of the district’s initial identification procedures to evaluate its compliance with state and federal laws and regulations and identified the following issues based on the parent and staff interviews and a review of documentation and student records:   * The district does not have a Home Language Survey (HLS) that includes questions provided by the Department. * The district has an online registration system and the online initial identification process does not include support to parents for them to complete their children’s enrollment in an efficient way and understand their parental rights to give informed decisions regarding the education of their children. * The district’s high school has different enrollment procedures as compared to the procedures for enrollment at other schools in the district. The enrollment and placement process for high school students may take more time than necessary due to the insufficient staffing assigned to the initial enrollment and screening for English language proficiency and for academics. As a result, high school students are scheduled for their courses late and they miss valuable learning time. * Students with Limited or Interrupted Formal Education (SLIFE) are not consistently identified and coded as SLIFE in the Student Information Management System (SIMS) that districts use to submit data and be in compliance with state reporting requirements.   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 a TFM review 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 Department also identified the following compliance issues:   * The district has procedures in place to identify ELs who do not meet English proficiency benchmarks and a process to 1) identify the areas in which such identified ELs need improvement and 2) establish personalized goals for attaining English proficiency. However, district procedures pertaining to benchmark requirements are not consistently implemented throughout the district and in some schools, teachers, including ESL teachers, are not even aware of what benchmark requirements are. * Staff interviews indicated that assignment of students to schools occurs without consideration of staffing and other resources needed to meet the academic and linguistic needs of English learners in those schools. * In some of the district schools, English learners who are at English language proficiency 1 and 2 receive ESL and content instruction in a self-contained setting for Newcomers/SLIFE and students who are at English language proficiency 3 and 4 are placed in content classes with a paraprofessional and are not provided ESL instruction as M.G.L. c. 71A, § 4 requires. * The district does not have a process to determine what SLIFE students’ academic and linguistic needs are and to provide instruction that is specifically designed for them with the overarching goals of English language development and academic content achievement as the state laws require. * When students are scheduled to receive ESL instruction through a push-in model, English language development doesn't always happen. In many cases, the ESL teacher pushing in assists the content teacher in teaching content standards but does not provide explicit ESL instruction. * The district does not implement a consistent ESL curriculum for ESL instruction which is integral to an effective ELE program in which ELs of all grades and proficiency levels become English proficient at a rapid pace. * English learners do not always have access to rigorous, grade-level content instruction. Content teachers do not always use sheltered content instruction strategies that focus on meaningful and engaging activities designed to build content knowledge while strategically taking into account the language demands that ELs face in content classrooms, scaffolding appropriately to meet these demands, and delving into specifics about the language of the content by developing language objectives aligned to WIDA Standards 2020. * In some of the district schools, English learners with disabilities do not receive ELE services they are eligible for. * English learners do not always have equal access to special education services because students who are referred for evaluation are often found ineligible due to the lack of training and expertise to distinguish potential disability from language barriers. * The district places some students in out-of-district placements to meet their unique needs. The district does not ensure that ELs in such out-of-district placements receive ELE services.   The Department identified the following issues at the Lowell High School in addition to the ones listed above:   * Many ELs at the high school are placed in self-contained classes and they are separated from non-EL peers for longer than instructionally necessary. The Department determines that the district is not carrying out its chosen program at the high school in the least segregative manner. * ELs at the Lowell High School do not have access to the same academic opportunities as their non-EL peers, specifically components of the Freshman Academy experience, including Advisory in some cases, honor classes, advanced programs, early college programs, and college counseling. * ELs at the Lowell High School, including ELs at the English proficiency levels 3 and 4, are placed in double blocks of ESL classes scheduled by students’ proficiency level rather than grade level. They do not have an additional grade-level ELA class in their schedule. Therefore, they do not have access to grade-appropriate ELA instruction. |

| **Improvement Area 3** |
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| **Criterion:** ELE 6 - Program Exit and Readiness |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation and data indicated that the district may exit some students from the ELE program before they meet the minimum exit criteria set by the Department. The district's current reclassification practices are not in compliance with 603 CMR 14.02 that requires districts to establish and implement exit criteria in accordance with the Department guidelines. |

| **Improvement Area 4** |
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| **Criterion:** ELE 7 - Parent Involvement |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation, staff interviews and parent focus group indicated that translations are not always provided for parents who have requested documents in languages other than English. Further, flyers given to students by schools are not always provided to English learners and their families in languages other than English to inform them of the available curricular and extra-curricular opportunities.  The Department has determined that the district does not always provide effective language assistance to students and 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 and to provide equal access to English learners for available curricular and extra-curricular opportunities. |

| **Improvement Area 5** |
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| **Criterion:** ELE 8 - Declining Entry to a Program |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of the district documentation and staff interviews indicated that the written confirmation of the withdrawal (opt-out request) is not provided annually to the school by the parent or legal guardian and such confirmation is not retained in the student's cumulative folder as required by G.L. c. 71A §12.  A review of documentation submitted also indicated that the district does not always monitor the progress of opt-out students in English language acquisition and in academics and provide support as needed. |

| **Improvement Area 6** |
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| **Criterion:** ELE 10 - Parental Notification |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation and student records indicated that the district does not send to the parents of ELs reports to inform them of the progress their children make towards attaining English language proficiency.  A review of documentation and student records also indicated that the district does not send a notification to the parents of ELs to inform them of their rights to: (i) choose a language acquisition program among those offered by the school district under section 4; (ii) request a new language acquisition program under said section 4; or (iii) withdraw a student from a language acquisition program, nor initial and annual notification letters to inform them of their child's placement in an ELE program and other required information that needs to be communicated to parents annually.  The Department concludes that the district does not have clear written procedures for parental notification, including timeline, ensuring compliance with state and federal forms, and responsibilities for various stakeholder roles. |

| **Improvement Area 7** |
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| **Criterion:** ELE 13 - Follow-up Support |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation and staff interviews indicated that the district does not always monitor Former English learners (FELs) to ensure they make progress in academics and provide support to those students as needed. |

| **Improvement Area 8** |
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| **Criterion:** ELE 14 - Licensure Requirements |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews with staff and classroom observations indicated that “Newcomer” program consists of ELs being in sheltered classes for all content areas taught by ESL teachers without an appropriate content license or a current waiver issued by the Massachusetts Department of Elementary and Secondary Education.  A review of the relevant SEI Endorsement data indicated that most core academic teachers assigned to provide sheltered English instruction to English learners hold the SEI Teacher Endorsement, but some do not. Similarly, one administrator assigned to supervise or evaluate core academic teachers who provide sheltered English instruction to English learners does not hold the SEI Teacher Endorsement or the SEI Administrator Endorsement. |

| **Improvement Area 9** |
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| **Criterion:** ELE 15 - Professional Development Requirements |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews with staff indicated that the district does not provide professional development opportunities to support educators in using appropriate sheltering and scaffolding strategies to meet the socio-emotional, linguistic and academic needs of English learners and to ensure they have access to the same academic opportunities as their non-EL peers. |