

**Milford**

**Targeted and Focused Monitoring Report**

**Review Dates:** **February 27-28, 2024**

**Date of Final Report:** **03/27/2024**



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Commissioner of Elementary and Secondary Education

During the 2023-2024 school year, Milford 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).

Milford

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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

| **Improvement Area** **1** |
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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 M.G.L. c. 71A, Section 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. Staff interviews, documentation review, and classroom observations indicated that the middle and high school are not carrying out their chosen programs in the least segregative manner. Interviews with staff at secondary levels in the district indicated that the district maintains EL students who are newcomers, levels 1, 2, or 3 in newcomer or self-contained classes longer than necessary so these students do not always have access to grade-level instruction, and do not appear to have equal access to early college programs, electives, AP, world language or vocational technical courses. Interviews also indicated that these EL students are grouped together both for English as a Second Language (ESL) and content instruction so they have no or minimum opportunity to interact and learn with their English-speaking peers. Furthermore, some students at the middle and high school shared during focus groups that they feel isolated because they do not have opportunities to interact with their English-speaking peers and learn together with students who do not share their linguistic and cultural background. Some students also shared that they feel like this structure both hinders their English language development and continues to make it difficult to feel a sense of belonging. The review also found that newcomers and ELs of lower proficiency levels are not held to the same learning standards as their peers in the middle and high school levels as indicated by observations and interviews with staff at all levels in the district. Out of 11 observations at the middle and high school, only 5 had a language objective and these language objectives were not always sufficient to target the language development needs of the EL students in these lessons. Also, interviews with staff at the middle and high school indicated that certain courses newcomers and ELs of lower proficiencies are enrolled in sometimes have the curriculum, content, and pacing significantly modified. Therefore the Department determined that not all students in the district have equitable opportunities to excel in all content areas across all grades and not all students in the district are held to high expectations with targeted support as the Department's vision (adopted in 2023) targets.Additionally, interviews with staff conducted during the review process revealed that content educators across the district, but particularly at the middle and high school, often do not view the classes they teach as SEI classes in which EL students must receive sheltered content instruction, which results in ELs not receiving the required sheltered content instruction or strategies necessary for them to access instruction that is grade level appropriate and rigorous. Also, interviews with staff conducted during the review process revealed that while the district does implement a co-teaching model at the elementary levels, the staff implementing this model of instruction have not received sufficient training to implement a co-teaching model with fidelity.Finally, interviews and a review of documentation indicated that while the district does have an ESL curriculum at the elementary levels that supports ELs of all grades and all proficiency levels to become English proficient at a rapid pace, the district's middle and high school ESL curricula do not demonstrate high expectations and grade level appropriate instruction for all EL students, regardless of grade or proficiency level, and does not support ELs at the secondary levels to become English proficient at a rapid pace. |

| **Improvement Area 2** |
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| **Criterion:** ELE 7 - Parent Involvement |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** Interviews indicated that although the district has policies and procedures in place to ensure that the district can provide translated documents and interpretation for families who need them from competent, appropriately trained internal district staff or outside resources, staff do not always implement these procedures with fidelity, instead staff rely on outside resources such as Google Translate or internal multilingual staff, even if these multilingual staff members have not been trained to provide language assistance. 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. |

| **Improvement Area 3** |
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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. |