

**Pittsfield**

**Targeted and Focused Monitoring Report**

**Review Dates:** **March 18-22, 2024**

**Date of Final Report:** **05/17/2024**



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Commissioner of Elementary and Secondary Education

During the 2023-2024 school year, Pittsfield 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).

Pittsfield

**SUMMARY OF COMPLIANCE CRITERIA RATINGS**

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

| **Improvement Area** **1** |
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| **Criterion:** ELE 2 - State Accountability Assessment |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** MCAS 2023 participation rates as shown in the state database indicates that only 92% of the grade 8 ELs in the district participated in the MCAS Science and Technology/Engineering test and 89% of the grade 6 ELs participated in the grade 6 MCAS English language Arts. Likewise, 88% of the grade 7 ELs participated in the MCAS Mathematics test. Additionally, accommodation lists are school based and not aligned across the district; some accommodations include 2-way dictionaries for English learners, some don't. |

| **Improvement Area 2** |
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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 the applicable requirements and identified the following issues: * A review of documentation and interviews with staff indicate that secondary students identified as potential English learners shadow a student for 3-5 days while the district coordinates initial identification and content placement assessments. This practice prevents the student from participating fully in their grade level education for several days although their fluent English peers are not required to follow the same practice.
* A review of documentation and interviews with staff and parents revealed that the district does not have appropriate procedures and practices in place to identify English learners, English learners with disabilities, SLIFE, or Opt-out students.
* Staff interviews and a review of documentation indicated that the district does not have a process for identifying Former English Learners (FELs) who come from other districts so that the district can continue monitoring them for a total of four years.
* Staff interviews indicated that the district does not have appropriate procedures in place to determine the EL status of students who move to the district from another district and to provide them with appropriate ELE services without delay. For example, there is a lack of access to data platforms, such as EDWIN Analytics, to determine the EL status of students who move to the district from another district.
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| **Improvement Area 3** |
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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 issues: * 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 even though they participate in the ACCESS for ELLs assessment. Further, submitted student records also indicate that the district roster does not accurately identify FEL students who still participate in ACCESS for ELLs even though they were reclassified.
* Conversely, interviews, documentation, and a review of student records indicated that the district lacks the ESL staffing capacity to effectively provide essential components of an effective ELE program, such as placing students in ESL courses with peers at appropriate levels, providing time for ESL collaboration with content teachers to identify language objectives, student needs and to provide appropriate supports and scaffolds for students with low levels of proficiency in content courses, providing effective oversight and monitoring of the ELE program, and advocating for English Learners at the administrative level.
* The district has not adopted procedures to identify English learners who do not meet English proficiency benchmarks and has not established a process for the district to:
	+ identify areas in which identified English learners needs improvement and establish personalized goals for the identified English learners to attain English proficiency;
	+ assess and track the progress of English learners in the identified areas of improvement;
	+ review resources and services available to identified English learners that may assist said learners in the identified areas of improvement; and
	+ incorporate input from the parents or legal guardian of the identified English learner as required under M.G.L. c. 71A, Section 11.
* English learners do not always have access to grade-level and rigorous content instruction and 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.
* Language assistance staff provide direct interpretation for English learners throughout the lessons in some SEI classes instead of sheltering the content to make it accessible for English learners. 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.
* 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.
* Finally, the review indicated that the district does not consistently support an ESL curriculum across all grades. Literacy and reading programs and materials do not replace an ESL curriculum which is integral to an effective ELE program in which ELs of all grades and proficiency levels become English proficient at a rapid pace.
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| **Improvement Area 4** |
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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 ACCESS data, submitted documentation, and student records indicated that the district inconsistently reclassifies students and does not accurately monitor them for four years. For instance, seven reclassified students participated in ACCESS 2022. Other English learners were reclassified before meeting the overall 4.2 and literacy 3.9 threshold. The district lacks consistent policies and procedures for identifying Former English Learners, notifying parents, and monitoring them for four years. |

| **Improvement Area 5** |
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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 provides many translated documents and interpretation for families who need them, it does not have 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 have training on their role, the ethics of interpreting and translating, and the need for confidentiality. The district needs to ensure that all of its translations sent to families are from competent, appropriately trained staff or outside resources that meet its legal obligations. For instance, interviews indicated that parents enrolling their children at the Mercer intake center now have access to a bilingual Spanish interpreter and with translated documents. However, families with other language needs do not have similar access to translation and interpretation services. In addition, screenshots of the Home Language Survey in the Updated Registration guide are only available in English no translated guidance on how contact the Pittsfield Public Schools for assistance. According to interviews conducted with staff only guidance and administration have been trained in how to use its on-demand interpretation service, Language Link. Likewise, teachers rely on Google Translate and other apps to translate messages home to parents, including report cards and progress reports. 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 started its English Learner Parent Advisory Council, the Multilingual Learner Parent Advisory Council (MLPAC) as required in M.G.L. c. 71A, §6A. However, not all parents are aware that it exists; no parent in the focus groups interviewed for this review were aware that the MLPAC exists or how it can serve as a partner with the schools and advocate for parents. |

| **Improvement Area 6** |
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| **Criterion:** ELE 8 - Declining Entry to a Program |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** The Department reviewed the district's compliance with the criterion pertaining to parental rights to opt out of ELE services and the requirement to monitor the progress of such students and identified the issues below: A review of the district documentation and staff interviews indicated that the district does not annually obtain written confirmation from parents or legal guardians who chose to withdraw their ELs from ELE programming and such confirmation is not retained in the students' cumulative folders as required by M.G.L. c. 71A, § 12. The district has policies and procedures to monitor the progress of students whose parents opted them out of ELE services. However, staff interviews and a review of student records indicated that the district does not consistently implement these policies and procedures to monitor the English language proficiency and academic progress of students who opted out of ELE services. |

| **Improvement Area 7** |
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| **Criterion:** ELE 10 - Parental Notification |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** The Department reviewed the district's compliance with the federal and state criterion of parental notification and identified the issues below:The updated registration does not include providing the Parent Notification Regarding English Language Education when the answer to any of the questions on the HLS is a language other than English as required in the Guidance on English Learner Education Services and Programming (March 2024), Step 3, page 8. A review of student records indicated that the district does not send progress reports to parents or legal guardians to inform them of the progress their children make towards acquiring English. Student records also indicated that the district does not send results of initial screening, English learner program letter, initial or annual parent notification letters, or parent notification letters of reclassification. The submitted documentation indicated that parent notification and progress reports are not always translated and provided in a language the parent can understand. |

| **Improvement Area 8** |
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| **Criterion:** ELE 13 - Follow-up Support |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** The district has policies and procedures to monitor the progress of students who are FELs. However, staff interviews and a review of student records indicated that the district does not have a system in place to implement these policies and procedures consistently to ensure that students have not been prematurely exited, any academic deficits they incurred as a result of participation in the ELE program have been remedied, and they are meaningfully participating in the standard instructional program comparable to their never-EL peers. |

| **Improvement Area 9** |
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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 ELs hold the SEI Teacher Endorsement, but some do not. In addition, a review of the relevant SEI Endorsement data also indicated that most administrators who supervise teachers of ELs hold the SEI Administrator Endorsement, but some do not. |

| **Improvement Area 10** |
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| **Criterion:** ELE 15 - Professional Development Requirements |
| **Rating:** Partially Implemented |
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| **Description of Current Issue:** A review of documentation reveals that district professional development plans do not include district level activities for teachers to earn 15 PDPs related to SEI, English as a Second Language or Bilingual Education in order to be eligible to renew their licenses. The Department concludes that this practice is not in compliance with 603 CMR 44.06(1) which requires districts to develop a professional development plan and provide training for teachers in second language acquisition techniques for the re-certification of teachers and administrators. |

| **Improvement Area 11** |
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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. |