
**English Language Learners:
Action Needed to Improve Program
Compliance and Performance**

A report by the District Performance Auditor
October 2010

**PORTLAND PUBLIC SCHOOLS
PORTLAND, OREGON**

PORTLAND PUBLIC SCHOOLS

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SUMMARY

English Language Learners (ELL) are the fastest growing segment of the student population in the United States. ELL students are increasingly present in all U.S. states and now comprise over 10 percent of the nation's K-12 population, up from 5 percent in 1990. ELL enrollment at Portland Public Schools exceeded 4,700 students in 2009-10, representing students speaking over 70 different languages and dialects. This audit analyzes the provision of ELL instructional services at Portland Public Schools and evaluates opportunities to improve performance.

The PPS district has been out of compliance with federal and state rules governing the provision of services to ELL students for 13 of the past 17 years, approximately 80 percent of the time between 1994 and 2010. Investigations and reviews by the federal Department of Education and the Oregon Department of Education have found recurrent problems in a number of areas despite PPS promises of corrective action and multiple efforts to improve compliance. Recurrent problems include:

- x Poor delivery of English language proficiency instruction
- x Inadequate access to core academic classes
- x Using unlicensed staff to provide instructional services and lack of appropriate professional development
- x Inappropriate methods for identifying eligible students and exiting proficient students

In addition to these compliance issues, PPS, like many districts in Oregon and around the nation, has had only modest success in helping students achieve English language proficiency and in closing the reading and math achievement gap between ELL and non-ELL students. For example, the percent of ELL students achieving proficiency and leaving the program declined from 47 percent in 2006-07 to 32 percent in 2008-09. In addition, the percent of ELL students meeting state benchmarks in reading and math has been significantly lower than the average of all PPS students and PPS economically disadvantaged students at all grade levels over the past five years. High school

graduation rates declined to 39% in 2008-09, 28 points lower than the district average of 67%.

It is difficult to determine with certainty the reasons for the district's inability to operate a compliant and high performing program for ELL students. However, based on my review, I believe there are four underlying factors that have had the most influence on recurrent compliance and performance problems. These factors are:

Lack of sustained commitment and leadership. While the district has been responsive and diligent in addressing compliance problems, district management has not made a serious effort to develop a vision for change and a defined strategy to achieve it. Additionally, frequent changes and turnover in key management positions has left the district without an effective and vocal advocate for improvement.

Inadequate monitoring and accountability systems. The district lacks a consistent and rigorous mechanism for on-site monitoring of schools to ensure accountability for ELL performance results. A significant amount of data on ELL language proficiency and achievement levels are available but I found little evidence that this information is compiled, analyzed, and communicated in useful formats on a frequent basis, or used consistently for decision-making.

Inconsistent and incomplete guidance and support for schools. School principals and administrators desire more complete and user-friendly operational guidance on how to manage and deliver services to ELL students. School officials say that information on the ELL program is available but it is not well-organized, changes frequently, and is difficult to understand.

Lack of collaborative effort. Progress toward a compliant and better performing ELL program is hampered by the lack of effective collaboration between the major groups involved with the delivery of services: ELL program managers, principals, regional managers, family service center staff, and parents. All expressed various levels of dissatisfaction with the operation of the program and distrust of other parties involved in the delivery.

In order to help the PPS district to establish a more stable, compliant, and better performing program for ELL students I make a number of recommendations and suggestions on pages 33 - 36 of this report. In brief, I recommend that the district undertake an improvement initiative, establish a rigorous accountability system, provide better operational support to schools, and strengthen collaboration.

INTRODUCTION

This report provides an analysis of educational services provided to English

- x Lau vs. Nichols (1974) found a denial of equal educational opportunity under the Civil Rights Act of 1964 and affirmed the authority of the federal government to require affirmative remedial efforts to give special attention to linguistically deprived children

- x Castaneda vs. Pickard (1981) formulated a three-part test to determine school district compliance with equal educational opportunity for limited English proficient students. Schools must 1.) pursue a program based on sound, recognized educational theory or legitimate experimental strategy, 2.) implement the program with practices, resources, and personnel to transfer theory to reality, and 3.) evaluate the program and modify programs that fail to produce results

- x Oregon State Statutes and Administrative Rules establish school district requirements to provide specific courses to English language learners to teach speaking, reading, and writing English. Districts must also comply with federal and state anti-discrimination laws. Authorizes state to provide special funding for ELL students and to monitor, evaluate, and sanction school district non-compliance.

ELL enrollment, staffing, and financial trends at Portland Public Schools

Over the past five years, the number of ELL students enrolled at PPS has declined by 10 percent, from 5,230 in 2005-06 to 4,721 in 2009-10. As shown in the table below, most of the decline is due to lower ELL enrollments at the high school level. The number of ELL students enrolled at the elementary level has increased while the number of middle school enrollment has remained relatively steady. Over all, ELL students represent about 10 percent of the district wide enrollment.

Figure 1 ELL enrollment at PPS by grade level, 2005-06 to 2009-10

	2005-6	2006-7	2007-8	2008-9	2009-10	PPS		
						Total	% ELL	
Elementary K-8	3276	3239	3,314	3,594	3,670	78%	25,629	14%
Middle	981	660	338	296	291	6%	5,211	6%
High	955	839	830	816	590	12%	11,034	5%
Other Special	18	5	267	189	170	4%	4,722	4%
TOTAL	5,230	4,743	4,749	4,895	4,721	100%	46,596	10%

Source: Fall Enrollment Data from *School Profile and Enrollment Data*

Online at <http://www.mis.pps.k12.or.us/docs/pg/10310>

According to PPS, ELL students speak over 70 different languages and dialects. Disaggregated by major language cluster, the language spoken by the largest group of

Figure 2 PPS ELL students by major language group, 2005-06 to 2009-10

	'05-06	'06-07	'07-08	'08-09	'09-10	
Arabic	38	29	17	39	54	1.2%
Chinese /Cantonese	292	315	280	219	232	4.9%
Russian	281	197	217	194	165	3.5%
Somali /Maay-Maay	17	285	303	355	357	7.6%
Southeast Asian (other)	315	229	240	228	216	4.6%
Spanish	2,744	2,525	2,468	2,511	2,368	50.5%
Vietnamese	565	558	543	583	602	12.8%
Other	978	605	681	782	694	14.8%
TOTAL	5,230	4,743	4,749	4,911	4,688	100.0%

Source: Portland Public School ESL program data

The table below displays the number of ELL students by English proficiency level over the past five years. The table shows that the percentage of students at proficiency levels 1 and 2 (50%) is about the same as the percentage of students at levels 3 and 4 (48%). Although there does not appear to be a clear pattern in the growth or decline in the number of students by proficiency level, the number of Early Intermediate (level 2) students has increased rather steadily over four years and the number of early advanced/advanced has declined slightly.

Figure 3 ELLs by English Language Proficiency level, 2005-06 to 2009-10

	'05-06*	'06-07	'07-08	'08-09	'09-10	
Beginner	n.a.	826	549	624	771	16.4%
Early Intermediate	n.a.	1,120	1,293	1,445	1,574	33.4%
Intermediate	n.a.	925	1,419	1,476	1,286	27.3%
Early Advanced	n.a.	1,074	1,226	1,168	963	20.4%
Advanced	n.a.	837	343	277	-	0.0%
n.a.	n.a.	2	30	-	120	2.5%
TOTAL	n.a.	4,784	4,860	4,990	4,714	100.0%

Source: Portland Public Schools ESL program data.
 ODE had not fully implemented the ELPA
 assessment - 05-06 data are not comparable.

As shown in Figure 4 below, over the past five years, the PPS general fund expenditures have remained relatively stable, increasing from \$11.4 million to \$11.9 million. Elementary schools have the highest number of ELL students and comprise most

Overall staffing for ELL education is comprised of ESL teachers and educational assistants at PPS schools, ESL/Bilingual Department management and administrative staff, and Family Service Center and curriculum and training employees funded by the ESL/Bilingual Program. The table below, shows that the number of ESL teachers and educational assistants, supervisors and administrators, family service center staff, and curriculum and training support staff from FY '05-06 through '09-10.

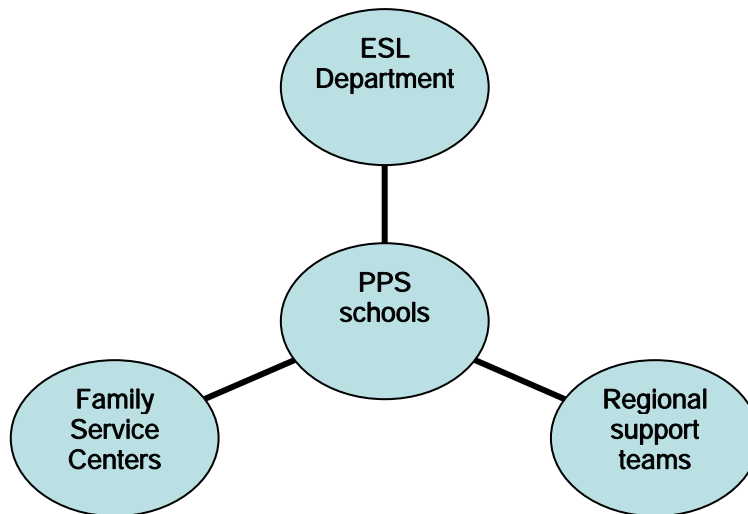
Figure 5 PPS ELL staffing FY2005-06 to 2009-10

	'05-06	'06-07	'07-08	'08-09	'09-10
Licensed teachers & assistants at schools	179	173	175	178	164
ESL/Bilingual program supervision & administration	12	14	16	19	17
Family center, social work, & assessment staff	12	12	11	11	13
Curriculum development and training support staff	0	3	2	7	6
Total funded ESL/Bilingual FTEs	203	201	204	214	200

Delivery of ELL services at PPS

English language and academic instruction is provided to ELL students at elementary, middle, and high schools. While school administrators (principals) and teachers have the primary responsibility for improving English language proficiency and ensuring students have access to core academic content, the ELL program is supported by three other groups: the ESL/Immersion department, Regional management and service teams, and the Family Support Centers.

Figure 6 Support for ELL services at PPS schools



ROLES AND RESPONSIBILITIES

PPS schools. Approximately 78 elementary, middle, and high schools provide English language and core academic instruction to PPS ELL students. Schools have the primary role and responsibility to improve the English proficiency of students while providing access to the grade level curriculum. In many cases, an ESL teacher under direction by the principal acts as a case manager at each school to monitor performance, coordinate testing and assessments, maintain records, and review promotions from the program.

Regional district management and services teams. The district is organized into three regions, each managed by a Deputy Superintendent. In each district, a cluster of

- x Administer an oral language proficiency assessment to students who are identified by the Home Language Survey as having a language other than English
 - x Inform schools and parents of assessment results and student eligibility for ELL services
 - x Create manual and automated record of student profile and English proficiency level
 - x Obtain parental approval to place student in ELL program
- 3. Place in English language development and sheltered instruction**
- x Place student in appropriate English language development (ELD) class at schools depending on proficiency level
 - x Ensure ELD class is a minimum of 150 minutes throughout the week
 - x Provide meaningful access to all aspects of the general education program at schools including math, language arts, social studies and science
 - x Provide ELD instruction at middle and high schools in place of one elective period
- 4. Deliver curriculum with qualified teachers**
- x Provide research-based ELD instruction with licensed teacher trained in methods that are effective with second language learners
 - x Provide adequate instructional materials and support services such as tutoring
 - x Ensure general education teachers have appropriate credentials and training to offer sheltered instruction in ways that make academic content accessible to ELL students
- 5. Annually test English proficiency and academic achievement**
- x Administer the Oregon English Language Proficiency Assessment annually to all ELL students to determine progress in improving English proficiency
 - x Administer the Oregon Assessment of Knowledge and Skills annually to Assess progress in meeting language and math benchmarks, test participation levels, and attendance and graduation rates

6. Exit the program

- x Promote ELL students out of the ELL program when students achieve English language proficiency
- x Monitor students that have left the program for at least two years to assess progress and to determine if additional language assistance is needed

Figure 7 Overall process for delivering services to ELL students

IDENTIFY ELIGIBILITY

- x Parents complete home language survey
- x Survey completed at school or Family Center



PROFICIENCY LEVEL ASSESSMENT

- x If language other than English is identified, language proficiency assessment given (IPT)
- x If ESL eligible, student profile and student ESL records created
- x If HS student, determine if student has eligible credits from previous schooling



ELD AND SHELTERED INSTRUCTION

- x Student profile and proficiency level data sent to school
- x Student placed in English language development (ELD) and core academic classes if parent accepts ELL services



CURRICULUM / QUALIFIED STAFF

- x Trained and qualified ESL and classroom teachers provide academic instruction
- x Special support provided to students as needed



ANNUAL ELPA & OAKS ASSESSMENT

- x Assessed by ODE
- x Students tested for English proficiency level and academic achievement each spring
- x Students continue with ELD/sheltered instruction or considered for exit



EXIT ELL PROGRAM

- x If evidence indicates English proficiency, promoted from ELD
 - x Monitored for continuing proficiency for 2 years - retained/returned
-

Audit objectives, scope, and methods

This audit had four primary objectives as follows:

1. To identify and describe the history of PPS non-compliance with federal and state laws and regulations for the provision of services to English language learners from 1994 to 2010.
2. To identify and summarize major provisions of laws, regulations, policies and best practices for how school districts should provide services to English language learners.
3. To determine the major factors that contribute to the inability of PPS to consistently operate a compliant and high-performing ELL program.
4. To evaluate the impact of non-compliance on the PPS district and ELL students.

To address these objectives, I interviewed PPS managers and administrators including the ESL/Immersion Department, school principals, four Deputy Superintendents, the Chief Academic Officer, ESL Program Administrators and assessment specialists, representatives from the Family Service Centers, and parent representatives. I also met with officials from the Oregon Department of Education and three other school districts in the region (Salem-Keizer, Forest Grove, and Hillsboro) to learn about the requirements of ELL service delivery and how other districts implement the program. In addition, I reviewed laws, regulations, policies and procedures from PPS, ODE, and the federal Department of Education, and obtained documents from prior investigations, audits, and reviews. I also reviewed academic research and professional publications on the delivery of services to English language learners.

I obtained data on ELL academic achievement and English proficiency level testing results from ODE and PPS Research and Evaluation. I also obtained data on PPS' ELL population including enrollment, home language, program duration, and exit rates. Finally, I obtained information on PPS Sc

provides a reasonable basis for the finding and conclusions based on the audit objectives. I have implemented an internal quality control process to ensure standards are met but have not undergone an external quality review as required by standards.

AUDIT RESULTS

Over the past seventeen years, PPS has been in and out of compliance with federal and state regulatory requirements with no sustained improvement in the delivery of ELL services. Similar to many school districts in the nation, PPS has had only modest success in helping ELL students achieve English proficiency and in closing the reading and math achievement gap between ELL and non-ELL students. Many of these problems are inherent in the challenge of helping students learn English while also achieving mastery of core academic content in a new language. However, some of the problems at PPS are the result of various weaknesses in the overall management of the program. Specifically, the district has not made a strong commitment to improve the approach to ELL instruction nor implemented rigorous methods to monitor performance and strengthen accountability for results. In addition, the district has not provided consistent and clear guidance and support to schools to help improve delivery of services to the ELL population. Finally, unlike districts around the country that show improvement in ELL instruction, there is an overall lack of positive collaboration among the various parties involved in the delivery of ELL services at PPS. There are recent signs of progress in parent collaboration and expanded professional development opportunities but they are threatened by continuing resource constraints and turnover in key leadership positions.

Lengthy history of non-compliance: 1994 to 2010

The Portland Public Schools has been out of compliance with state and federal regulations governing the provision of ELL educational services for 13 of the past 17 years, approximately 80 percent of time between 1994 and 2010. Beginning with the initial compliance investigation by the federal Department of Education's Office of Civil Rights (OCR) in 1994 through the most recent compliance review by the Oregon Department of Education in 2009, the district has had recurrent deficiencies in the delivery of services to ELL students. The sections below summarize the four main investigations and reviews conducted at PPS and compare the finding results.

Figure 8 Recurrent problem areas

ESL compliance problems identified by OCR and ODE	1994 (OCR)	1999 (OCR)	2005 (ODE)	2009 (ODE)
Identification/assessment	U	U		
Translation	U	U		U
Placement/curriculum	U	U	U	U
Staffing	U	U		U
Textbooks and materials	U	U		
Exiting and monitoring		U	U	U
Evaluation		U		
Other	U	U		

Source: Auditor’s analysis of ESL compliance and monitoring documents

Our review also suggest that the ten years spent bringing PPS into compliance from 1994 to 2005 appears to have addressed previous recurrent problems in identification and assessment of eligible students, development of adequate textbooks and instructional materials, and the evaluation of ELL effectiveness. These weaknesses have not been identified in the last two ODE reviews in 2005 and 2009.

Over this 17-year period, four separate complaints were filed with the federal Department of Education Office of Civil Rights. The initial complaint in 1994 was followed by another complaint in 1998. Both these complaints have subsequently been investigated and closed. A new complaint in January 2010 alleges ongoing problems with communicating with non-English speaking parents. OCR is currently reviewing ODE’s monitoring efforts to determine if the district has met regulations in this area. Another complaint in February 2010 alleges that students at one high school do not have access to a quality and equitable education. We could not determine if OCR has officially opened a case for this investigation.

HISTORY OF CORRECTIVE ACTIONS

From 1994 through May of 2010, the district has been in corrective action status for thirteen of the seventeen years. Failure to comply with initial agreements to correct deficiencies led to more intensive monitoring and additional findings of non-compliance. For example, the initial OCR 1994 settlement agreement included two general findings and seven remedial findings and 61 action steps. The 1999 agreement to resolve was more comprehensive and resulted in 14 findings and 75 substantial and far-reaching action steps.

Similarly, the 2005 ODE investigation identified findings in two areas at three high schools but the 2009 ODE monitoring identified visits identified eight finding areas with substantial corrective action requirements. The table below summarizes the corrective actions taken by PPS over the past 17 years to address ELL program deficiencies. Appendix C provides more detailed information on actions taken by PPS over the past 17 years to address OCR and ODE investigations and reviews.

Figure 9 Summary of corrective actions taken to achieve compliance

1994-1999 (OCR)	(deemed insufficient to meet Settlement Agreement by 1998)
1999-2004 (1999 Agreement to Resolve)	More detailed and comprehensive corrective actions in 1999 Agreement to Resolve were completed over 5-year period
2005-6 (ODE)	Corrective actions focused on improving ELD teacher training, parent notification, and better reporting.
2008-9 (OCR)	Corrective actions focused on enhancing ELL program at 4 high schools
2009-10 (ODE)	Comprehensive corrective actions implemented to achieve compliance and restore Title III funding
Source: Auditors analysis of PPS responses.	

The inability to implement a compliant and stable program to serve ELL students has affected the image and reputation of PPS. In particular, the withholding of federal funds in 2009 -10 resulted in adverse local and national media reports.

Student English proficiency and academic achievement

Despite the level of effort taken by PPS to improve compliance with federal and state requirements, the performance of the district in helping students achieve English language proficiency has not shown improvement. Over the past five years, the percent of students making progress in acquiring English language proficiency (i.e. the percent of students increasing proficiency by at least one level) has declined, particularly from 2006-07 to 2008-09. Although the district exceeded the state target of 35 percent in these years, the state target has increased to 50 percent in 2009-10.

In addition, the percent of students attaining English language proficiency and leaving the program has declined from 45 percent in 2006-07 to 32 percent in 2008-09, and the district did not meet the state target of 50 percent in the past three years.

Figure 11 English proficiency level assessments, 2004-05 to 2008-09

		'04-05*	'05-06*	'06-07	'07-08	'08-09
% ELL students making progress	TARGET:			35%	35%	35%
		55%	49%	51%	46%	43%
% ELL students attaining proficiency	TARGET:			50%	50%	50%
		6%	11%	47%	25%	32%

Source: Oregon Department of Education ELPA assessments and PPS assessment data

* Different assessment method used in these years

It should be noted that most other Oregon districts with large ELL populations met goals related to making progress but also failed to reach the targeted goal for achieving proficiency. As shown in the table below, in 2008-09 PPS had the lowest percentage of students making progress in attaining English proficiency compared to other districts with large ELL enrollments but one of the highest percentages of students achieving proficiency after at least five years with the program.

percent of students making progress (70%) and Biz Tech high school had the highest percent of students achieving English proficiency during the year (65%).

Figure 13 2008-09 ELPA Proficiency Assessment results for PPS schools with highest ESL enrollments (xx% = below PPS average)

		ESL students*	Progressing**	Proficient***
Elementary/K8				
1	Harrison Park	256	41%	30%
2	Scott	227	39%	16%
3	Rigler	206	42%	30%
4	Cesar Chavez	199	23%	8%
5	Lent	173	43%	22%
6	Kelly	169	39%	59%
7	Woodmere	169	26%	19%
8	James John	159	42%	30%
9	Marysville	140	35%	9%
10	Rosa Parks	136	43%	31%
11	Atkinson	130	42%	12%
12	Beach	130	31%	5%
13	Whitman	129	63%	57%
14	Lee	125	24%	9%
15	Markham	106	44%	52%
16	Vestal	107	38%	16%
17	Sitton	98	31%	25%
18	Grout	98	48%	37%
19	Bridger	97	52%	17%
20	Peninsula	91	39%	37%
Middle Schools				
21	Lane	90	59%	33%
22	George	67	53%	26%
23	Hosford	58	63%	45%
24	Jackson	45	64%	42%
25	Mt. Tabor	25	52%	7%
High Schools				
26	Madison	149	55%	45%
27	Franklin	109	49%	46%
28	Biz Tech	64	55%	65%
29	Cleveland	64	45%	32%
30	Jefferson	63	51%	24%
31	Benson	63	70%	62%
	PPS AVERAGE		43%	32%
	STATE LARGE SCHOOL AVG		49%	22%

* Unduplicated student count by ODE

** AMAO #1: % of students moving up one proficiency level

*** AMAO #2: % of students in program at least 5 years that reach proficiency and exit

As shown by the three tables that follow, there is a significant gap in the achievement scores between ELL students and the subgroup of economically disadvantaged PPS students and the average of all PPS students. The percent of ELL students that meet benchmarks in reading and math at the elementary, middle, and high school levels is generally much lower. While ELL attendance rates in elementary and middle school are as good or better, graduation rates for ELL students in high school are also much lower than the economically disadvantaged subgroup and the average for all PPS students.

In addition, while ELL student performance at the elementary level meets or exceeds state standards, performance begins to fall in middle school and deteriorates significantly by high school. As shown in the Figure 14 below, ELL student reading and mathematics scores, and graduation rates in high school are significantly lower than the economically disadvantaged student subgroup and the average of all PPS students in comparison to elementary and middle school comparisons.

Figure 14 Annual Yearly Progress Assessments

PPS GRADES 3 to 5	% of students meeting state target
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PPS GRADES 6 to 8		% of students meeting state target				
		'04-05	'05-06*	'06-07	'07-08	'08-09
Reading Knowledge/Skills	STATE TARGET:	50%	50%	50%	60%	60%
ELL students		40%	38%	50%	49%	43%
Economically disadvantaged students		58%	60%	64%	62%	65%
All PPS students		73%	-	76%	77%	79%
Math Knowledge/Skills	STATE TARGET:	49%	49%	49%	59%	59%
ELL students		48%	49%	56%	65%	57%
Economically disadvantaged students		59%	64%	62%	66%	68%
All PPS students		74%		76%	79%	79%
Attendance	STATE TARGET:	92%	92%	957 M-1g Td		59%

Factors contributing to on-going problems

It is difficult to determine with certainty the reasons why PPS has had such difficulty in developing and implementing a stable and compliant program for ELL students. PPS managers, administrators, and staff have a variety of views about the weaknesses in the program but no common agreement on the primary factors for the long duration of non-compliance. However, based on over 60 interviews with PPS officials, ODE representatives, and staff from other districts, and my reading of recent national reports on ELL education, I believe there are four underlying factors that have had the most influence on the inability to address recurrent weaknesses in the delivery of ELL services at PPS.

LACK OF SUSTAINED COMMITMENT AND LEADERSHIP

PPS has not made a strong commitment to improving the district's approach to ELL instruction. While the district has been both responsive and diligent in addressing compliance issues identified by the federal and state governments, these actions have been largely exercises in compliance rather than a systematic effort to develop a clear vision for change and a defined strategy to achieve it.

A 2009 study of English Language Learners by the Council of Great City Schools found that districts that have experienced gains in ELL achievement took several organizational steps that fundamentally altered the way instructional services were provided to ELL students. These steps included developing a clear, unified vision for reform, employing an effective, vocal leader/advocate, and giving more authority and stature to the ELL department.

Lack of a defined strategy. My discussions with district officials indicate that the district has not fundamentally altered the way instructional services are delivered to ELL students over the past decade. Although the district has prepared biannual ELL plans required by regulation and expended significant effort to administer programs in accordance with federal and state provisions, the district has not identified and communicated a clear vision and strategy on how ELL students will achieve English proficiency and increase achievement. School officials I talked to do not clearly understand their respective roles and disagree on the best strategy for improvement.

According to the ESL director, the biannual ELL District Plan prepared by the department and submitted to the Oregon Department of Education is the central document that should guide the delivery of services to ELL students. As required by ODE, the plan defines the goals and strategies of the program and describes practices for identification, assessment, placement, and scheduling of students. However, my

discussions with Deputy Superintendents and school principals reveal little knowledge of this plan and its contents. Consequently, those officials with primary responsibility for improving the English language proficiency and academic achievement of ELL students have not participated in the development of the district plan to carry out the program nor understand the practices the district is committing them to.

Frequent leadership changes and no recognized internal advocate. During the 17 year period of compliance problems, the district has employed five different Superintendents, three different ESL directors, several permanent and interim academic officers, and a variety of different area directors and deputy superintendents. The current ESL director with a tenure of five years has more seniority than any central management level employee dealing with ELL at the PPS.

While it is not uncommon in large districts to have frequent turnover at key management positions, the ability to create and maintain an institutional commitment to a particular reform strategy becomes more difficult. Moreover, the institutional knowledge about what works and doesn't work in the delivery of programs is low, leading to repetitive responses and reactions to the same ongoing problems.

In addition, it does not appear that PPS has an effective and vocal internal advocate for the improvement of ELL services who has helped create and advance improvement efforts. In each of the improving districts identified in the 2009 study by the Council of Great City Schools, principals, teachers, and managers could identify a person that was a driving force in improving the district strategy toward ELL. This role was usually played by the ELL director, superintendent, chief academic officer, or school board member.

and school performance in improving ELL achievement is made more difficult, particularly if schools have a strong tradition of site-based management. Additionally, with a span of control approaching 30 to 1, deputy superintendents are hard pressed to address all the complex demands of managing schools and overseeing performance, let alone focus on an ELL population that is only 10 percent of the total district enrollment.

Some districts have attempted to address these organizational limitations by giving additional stature to the ESL department and appointing strong directors with authority to establish district-wide ELL practices and to work closely with central office departments and schools to oversee programs and performance. According to the Council of Great City Schools study, "..... superintendents were well-served in their decisions to appoint and explicitly support strong administrators to carry out a broad mandate to reform the ELL program."

INADEQUATE MONITORING AND ACCOUNTABILITY SYSTEMS

PPS has not developed and implemented effective monitoring and accountability systems for the ELL program. I found little evidence of consistent and rigorous on-site monitoring at schools and few mechanisms to ensure schools are accountable for ELL performance results. Principals and ESL administrators indicate that monitoring visits from ESL staff are rare and direct observation of ELL program implementation is infrequent. In addition, while annual OAKS and ELPA data are provided to schools, there is a lack of periodic reports throughout the year on how well schools and ELL students are performing in improving English proficiency and academic achievement. In addition, my review of a sample of School Improvement Plans for 2009-10 show that ELL student performance issues receive only cursory mention, even for schools that are struggling most to improve student English language proficiency.

Districts that have demonstrated improvement in the education of ELL students are characterized by the collection and use of student assessment data to diagnose individual student needs and to target instructional improvement efforts. While PPS has a significant amount of data on the English proficiency and achievement levels of ELL students, I found little evidence that this information is compiled, analyzed, and communicated in useful formats on a frequent basis. Annual assessment data on English proficiency, reading and math is readily available at PPS, as is individual ELL student profile information, but this data and information does not appear to be used to develop individual improvement plans for ELL students or to drive changes in schools that are struggling with ELL student achievement.

To address these weaknesses in monitoring and accountability, the ESL department is proposing to implement a comprehensive ESL monitoring system beginning in the 2010-11 school year. This planned system will include three phases of monitoring:

- x** Individual student reviews in the fall and spring to identify current proficiency and achievement status, determine appropriate placement and support

Signs of progress and threats to change

Over the past six months, PPS has initiated several efforts that hold promise for helping the district make progress in ensuring compliance and delivering a higher performing program for ELL students. Some of these efforts include:

- x More active parent involvement - The district held parent meetings and training sessions to actively involve parents in the education of their children and to inform them of their authority and responsibilities.
- x Creation of an ESL Workgroup - The Chief Academic Officer created a diverse kitchen cabinet of school officials and parents to discuss ELL program clarity, address complaints and problems, to assess school accountability for ELL performance, parent involvement, and funding.
- x Development of a comprehensive professional development plan - A multi-year plan to provide training sessions, workshops, and online instruction to K8 and High school teachers, administrators, and educational assistants. Training will focus on sheltered instruction and procedures for exiting students from the ELL program.

However, other events over the past several months pose new threats to the success of the program and the continuity of improvement efforts. Specifically:

- x Resignation of the Chief Academic Officer - The former CAO was responsible for establishing the ESL workgroup and initiating a critical review of how the program was operating. Although a capable replacement is in place, some of the reform energy may be lost in the transition period.
- x Budget reductions - Initial plans to enhance the number of ESL teachers in schools were changed due to the continuing structural deficit facing the district. In addition, several support and administrative positions in the ESL department were eliminated including ESL TOSAs responsible for instructional technology and professional training.
- x Eliminating assessment staff positions at family service centers - The two assessment positions were primarily responsible for administering the initial assessments of English proficiency for all ELL students and creating the initial student profile records for ELL students. Transitioning these functions to other staff increases the risk that mistakes will occur in appropriately identifying and placing ELL students.

RECOMMENDATIONS

In order to establish a stable and compliant program for English Language Learners that improves student's English proficiency and academic achievement, the Portland Public Schools should take a number of actions. These actions should enhance and support corrective actions that are planned for 2010-11 in response to the most recent ODE monitoring visits. My recommendations should not require additional resources but will require a more deliberate, coordinated, and managed approach to delivery of ELL instructional services. Specifically, I recommend that the Superintendent direct the Chief Academic Officer in collaboration with Deputy Superintendents to take the following actions:

1. **Develop and implement an ELL improvement initiative.** The ELL initiative should establish a broadly shared vision for improvement and a clear strategy for change that focuses on measurable increases in English language proficiency and academic achievement. Although compliance with federal and state requirements must be achieved, the ELL initiative should be guided by the need for performance improvement. The development of this initiative may require several changes in the management and organizational structure of the ELL program. For example, the district should consider:
 - a. Establishing a temporary task force to develop and guide the ELL improvement initiative. The task-force should include representatives of the major parties involved in the delivery of ELL instructional services: Deputy Superintendents, ESL administrators, school administrators, ESL and core subject teachers, assessment and evaluation staff, and parents.
 - b. Appointing a PPS district official as the chair of the task force and giving this official significant authority and stature to lead the improvement initiative effort. The chair should have primary responsibility for 1) helping the task-force develop a shared vision for ELL improvement and a strategy for change, 2) obtaining school board support for the vision and strategy, and 3) communicating this vision to the school and parent communities.

- c. Empowering the ELL program. Consider placing the director on the Superintendent's leadership cabinet and giving the ESL program the responsibility and authority to implement the improvement initiative, to establish district-wide ELL practices, and to work closely with other central office managers and school administrators to oversee progress.
- 2. **Establish a strong monitoring and accountability systems for the ELL program.**
The elements of an improved monitoring and accountability system for the delivery of ELL instructional services should include:
 - a.

3. **Provide better support and guidance to schools on their roles and responsibilities for ELL instruction.** PPS schools should receive improved support and guidance to help deliver instructional services to ELL students effectively and efficiently, and to improve compliance with established federal and state requirements. Support and guidance that the district should consider providing to schools ce that the diS7effecti

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MANAGEMENT RESPONSE

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APPENDICES

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APPENDIX B

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