INDEPENDENT MONITOR REPORT

CONGRESS OF HISPANIC EDUCATORS ET AL., PETITIONERS, V. SCHOOL DISTRICT NO. 1, DENVER, COLORADO

Submitted to

U.S. DISTRICT JUDGE RICHARD MATSCH
& ALL FORMAL PARTIES TO THE CASE

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CONTENTS

ADVANCE SUMMARY

This is my sixth report as Independent Monitor (IM) in the case *Congress of Hispanic Educators et al., Petitioners, v. School District No. 1, Denver, Colorado.* In early 2017, I sought the approval of the parties to complete a longer more comprehensive report that would cover the period from January 1, 2016 -- February 28, 2017. The DOJ, CHE, and DPS approved my request at the most recent meeting of the parties held in Denver during April 2017.

In the previous Fifth Report submitted to the Court, I referenced the fact that beginning in late 2015, the focus of future site visits to Denver changed. In October 2015, the Independent Monitor, with the assistance of Dr. Chris Nelson, began preparing targeted spot audits of select chapters of the Consent Decree in alignment with a tool used by DPS called the Implementation Tracker. In Report 5, we provided a rationale for and a description of the spot-audit process, along with the preliminary findings of a pilot test of a spot audit we conducted of Chapter 7 of the CD. That pilot test, which was conducted at Bryant Webster Dual Language School and DCIS Montbello High School, formed the basis for our first actual onsite spot-audit in 2016.

During the 14 months covered by this report, I made seven site visits to Denver and Dr. Nelson joined me for six of them. Our goal for 2016 was to complete spot -audits of five of the ten CD chapters. We conducted all five audits, completing four of them and partially completing the fifth. The first site visit to Denver was in March at which time we engaged in our first spot-audit of CD Chapter 7: Considerations Related to Special Education and Section 504 Services for English Language Learners, focusing on sections A through G of the chapter. Completion of the spot-audit for Chapter 7 will take place in 2018 and we comment further on this in the Chapter 7 section of this report. The four additional chapters we audited in 2016 and early 2017 included;

- Chapter 3: Parent Communication, Student Screening and Provisional Placement, Assessments for Eligibility and, Monitoring of Students Who Decline Services
- Chapter 2: Instructional Services Advisory Team
- Chapter 8: Charter Schools
- Chapter 6: Parental Oversight

As I've done previously, I coordinated all seven site visits to Denver with staff at the ELA Department including Director Jorge Robles. We apprised CHE and the DOJ of both the dates of our visit and the focus of our spot-audits. We also invited members of CHE to join us at school sites and district meetings during our site visits. That same invitation was extended to the DOJ. At varying times during the site visits, we were joined by members of CHE, representatives from the BUENO Center for Multicultural Education at the University of Colorado and, on one occasion, by DOJ consultant Dr. Claude Goldenberg. Their participation was valuable and their feedback was informative and useful.

Prior to each spot audit, we chose a representative sample of schools. The process involved reviewing a spreadsheet that listed all schools visited previously. We then examined the most recent ELA Program Report that corresponded to the planned date of our site visit. For example, for our March 2016 site visit, we reviewed data from Section 9.V.A.2 from the January 15, 2016 Report submitted by DPS to the parties. Next, we identified schools that we had not visited previously, and it was from that list that we selected schools for the upcoming visit. Based on data in the corresponding ELA Program Reports, we then identified a sample of schools that represented various grade levels and ELA Designations such as TNLI, ELA-E, ELA-S, Qualified Spanish Resource Teacher, etc.

Since we typically visited 5-8 schools during a site visit, we tried to select a high school and middle school as part of the representative sample, with the remaining schools being elementary schools. On a few occasions, we identified a K-8 school to visit in place of a middle school for the purpose of visiting and examining how those schools implemented their ELA Program.

Once we identified our representative sample of schools, we submitted the list to the ELA Program and requested that they schedule our forthcoming site visit. Once that scheduling was done, it was provided to us. We in turn shared that with CHE members in Denver and invited them to join us for any or all of the site visits. Depending on the focus of the spot audit, we identified for DPS the persons at the school site we wished to meet with. When we spot audited Chapter 7, we requested to meet with Special Education teachers or resource persons who could provide us with access to IEPs at the school sites. Additionally, we scheduled a meeting with John Simmons, Executive Director for Student Services as well as his central office staff responsible for coordinating the district's Special Education and 504 Program Offices. When we conducted a spot audit of Chapter 6, in addition to meeting and interviewing parents, I met with Acting Director of the Family and Community Engagement Office, Antonio Esquibel, and Landon Mascarenaz, who was in charge of strategy development for that office. At every school site we visited, we were joined by the ELA Network Partner/s to whom that school was assigned. The Network Partners were an excellent resource in support of our spot-audit efforts and often provided access to student data that we were not easily able to secure.

In the first draft of this report submitted to the parties, CHE and the DOJ asked how we identified the schools we visited for each of the five chapters we spot audited. The process above is the one we used for each of our site visits with some minor variations. For example, some schools we visited twice but for the majority of site visits, we tried to identify schools that we had not visited previously. We tried to visit at least one middle and one high school during each site visit but at least on one occasion, we didn't visit a middle or K-8 school. Our objective in sampling the schools in this manner was to choose an unbiased (we chose the schools, not DPS) and representative (of program type and school level) sample.

Prior to conducting the five spot audits, we prepared a spot-audit checklist for each respective CD chapter. Each checklist consisted of a representative sample of CD requirements taken from the chapter we were spot-auditing. For the sake of consistency, we asked the same questions of assembled staff or the principal at each identified school site. In addition, at every single school site visited during 2016, we conducted a document review as part of our data gathering effort, seeking the same type of information at each school. Typically, we asked for rosters of ELL students at the school and then systematically selected a targeted number of students for the purpose of reviewing data in their files. Systematic sampling is considered as good as random sampling for the purpose of selecting an unbiased sample, and involves selecting every “nth” student from a complete list of the ELL students whose records we were examining. If a sample of 10 ELL students was desired and there were 60 total ELL students at a school, we selected every sixth student from that list. As an example, at the six school sites where we conducted the spot audit of Chapter 7, we requested Individual Education Plans (IEPs) for a systematically identified group of ELL students. When we conducted the spot audit of Chapter 2, we actually sat in on ISA Team meetings at school sites and observed the process that the school undertakes in making redesignation decisions. In addition, we interviewed ISA Team members and asked a series of questions related to CD requirements from that chapter. At the school sites that we selected as part of the Chapter 6 spot audit, we reviewed required records and documents and also attended ELA PAC meetings as part of our data gathering.

This sixth report is organized differently from all other previous reports. Following the Introduction, we discuss our findings for each of the five CD chapters we audited and that were listed previously in this section. For each of these five sections, we provide a short narrative which describes the schools we visited, the process we undertook for gathering data, and whom we met with at each site. We then provide a summary of the data collected based on our spot audit checklist for each chapter. Finally, we provide summary results of the document review conducted at the schools visited. We follow this same process for each of the five chapters.

After our findings are discussed for each of the five CD chapters audited, we include a section that provides a Summary of Progress and then a section that offers a series of Recommendations based on our findings. Ultimately, the goal is to present quantitative and qualitative findings based on data that we collected using a process that is consistent for each of the five chapters audited.

INTRODUCTION

This sixth report to the Court is markedly different from the previous five reports. Previously, it has been a challenge to collect information and gather evidence that quantifies whether DPS is meeting the requirements of the Consent Decree. Although there has been a consistent attempt in each report prior to this one to assess the progress that DPS is making, those attempts focused on some of the main provisions of the CD and concerns of the plaintiffs regarding CD implementation (e.g., availability of high quality Spanish language materials); however, they did not provide the more comprehensive picture of CD implementation across all 10 chapters needed to enable a more thorough monitoring of, and judgement regarding, "CD implementation." It was the frustration that resulted from previous efforts that led me to seek an alternative approach. Credit goes to my collaborator, Dr. Chris Nelson, for recommending that we consider a mixed methods program evaluation and research approach (e.g., Mertens, 2015; Zohrabi, 2013) to guide our efforts moving forward. Since the role of the IM is to collect information on DPS's implementation of the CD, we felt methods used in the field of educational program evaluation to document program implementation would be an appropriate approach to take.

A mixed methods approach involves the collection of both quantitative and qualitative data to answer program evaluation or research questions, and our data sources consisted of direct observation, interviews, and document review. Our data collection and analysis was designed to determine the degree of CD implementation for the five chapters we examined by documenting whether "representative indicators" of CD implementation for each chapter were in evidence at the school sites, in individual student records on the

Infinite Campus (the District's electronic data management system), or at the Central Office. In the results sections of this report, we detail the number and/or percent of school sites, student records, documents, interview responses, or directly-observed activities, tied to the representative indicators for each CD chapter, that reflected what we would expect to see if the CD was being implemented as intended.

The mixed methods program evaluation approach we used to document CD implementation is based on early writings from the Center for the Study of Evaluation at UCLA (e.g., Morris & Fitz-Gibbon, 1978); the reviews of traditional program evaluation approaches in Worthen and Sanders (1987) and later in Fitzpatrick, Sanders, and Worthen (2011); and the "pragmatic" school of thought regarding educational program evaluation and research (Mertens, 2015). Zohrabi (2013) states the philosophy that guides the use of mixed methods: "It is believed that using different types of procedures for collecting data and obtaining that information through different sources (learners, teachers, program staff, etc.) can augment the validity and reliability of the data and their interpretation."

For each of the five CD chapters discussed in the following sections, we prepared a spot-audit checklist/interview form based on representative indicators (i.e., a representative sample) of CD requirements. In developing each checklist, we operationally defined a representative indicator as a piece of information or the occurrence of an activity we should be able to document in a review of documents, through interviews with DPS staff or parents, or witness through direct observation if the CD was being implemented as intended. In each of the following chapters, we specify the CD chapter section on which each representative indicator is based.

Our use of "spot audits" is based on the need to draw representative samples of data to document CD implementation given the scope of the CD, the number of schools and staff in DPS, and the volume of documents generated by the district reflective of CD implementation. Sampling is commonly used, of course, in both quantitative and qualitative social science research, and research guidelines exist for the various approaches used to draw samples and for recommended sample sizes (e.g., Mertens, 2015). In an implementation-focused program evaluation of a large complex system such as DPS, and with two individuals (the IM and Dr. Nelson) collecting data, we used a combination of a purposive sampling approach (e.g., Fitzpatrick, Sanders, & Worthen, 2011) and a systematic sampling approach to choose schools in which we collected in-depth data during half-day visits (typically) at school sites we had selected.

In selecting school sites to visit, we purposely chose to visit several elementary (the largest stratum in the population of DPS schools), at least one middle school, and at least one high school for each visit. Within those three school levels, we sampled schools "without replacement," meaning that, for each trip to DPS to collect data, we sampled from a list of schools we had not yet visited. Even so, we have visited several schools more than once. In our sampling, we also tried to reflect the District's ELA Designations such as TNLI, ELA-E, ELA-S, or Qualified Spanish Resource Teacher. Fitzpatrick, Sanders, and Worthen (2011) make the following point pertinent to the approach we used: "Purposive samples often require extensive data collection . . . Thus data collection with purposive samples can be costly. If so, the number selected may be small" (p. 410). As stated earlier in this report, our objective in sampling the schools in this manner was to choose an unbiased (we chose the schools, not DPS) and representative (of program type and school level) sample.

With a more clear program evaluation and research methodology driving our work, we initiated our effort by conducting an unannounced spot-audit pilot test of CD Chapter 7 at two DPS schools in November of 2015 (described in our fifth report). We were less concerned in the pilot test with what the spot audit yielded in terms of data and more concerned with the viability of the process we used to gather information. From that initial pilot test, we determined that an audit checklist that clearly aligned with a representative sample of the CD requirements in Chapter 7 would work as the basis for collecting data tied to details of that particular CD chapter. Further, we identified who the essential staff at each school were that we needed to interview and what data sources we would need to review. We also determined that it was appropriate to debrief with the school principal and other school staff as well as district personnel regarding the results of the spot audit, and then to assess, based on the spot audit findings, whether follow-up visits to those schools or other schools were necessary.

The identification of the CD chapters to spot audit during 2016 and early 2017 was based on the sequence in which the district indicated CD implementation had been and would be proceeding. This sequence is described in the district's Implementation Tracker, which the district created to provide an overview of its CD implementation actions.

We made the decision to conduct our first spot audit of Chapter 7 of the CD in March of 2016. We then planned spot audits of Chapters 3, 2, 8, and 6 during the remainder of 2016 and into early 2017. Our plan has been to conduct spot audits of the remaining five CD chapters during 2017 and part of 2018, and compile those findings into a report similar to this one (Report Seven, which we plan to submit in June 2018).

As noted earlier, I made seven site visits to Denver during 2016 and early 2017. Dr. Nelson joined me for six of these visits. I continued the practice of coordinating my schedule during those weeks that we were in Denver with ELA Program staff. In addition, CHE members were provided with advance notice of our planned site visits and invited to join us at school sites and district meetings. Their presence and participation at numerous school site visits was an asset to our spot audit process. Moreover, it gave CHE members an opportunity to see and hear first-hand what the district is doing in terms of implementing the requirements of the CD. Numerous teachers, principals, ELA Network Partners and other district staff commented to me that they were pleased to meet CHE members and appreciated their comments during school site visits.

Appreciation is once more extended to the ELA Program staff. In addition to coordinating and helping arrange our site visits to nearly 40 school sites during 2106 and early 2107, they also facilitated district meetings, secured translators for several parent meetings I facilitated, coordinated my participation with the officers of the DAC Board at one of their scheduled meetings, and assisted us in accessing data that was essential to our evidence gathering. Additionally, they provided online training for Dr. Nelson and me in real time on tools like the ELL List, which is found at every school. The ELL List is used for monitoring purposes and it identifies current ELs by school, PPF, and classroom/course to ensure that students are appropriately placed (Service Percentage). The report compares student information with teacher and classroom/course information. The ELA Network Partners continue to be an enormous asset to the district and the ELA Program and they are now a presence at every school site visit we make.

During the period covered by this report, we collected a substantial amount of information. It has taken a significant amount of time and effort to analyze and report these data. What follows is a CD chapter by chapter analysis of our data collection for the five CD chapters we focused on in 2016 and early 2017. The discussion of each chapter begins with a short introduction followed by a description of our data collection methods (items on the spot audit checklist, interview questions, descriptions of individuals interviewed, documents reviewed, and activities observed). The results of the spot audits and additional information collected for the chapter are then summarized in tables both quantitatively and qualitatively as appropriate. A short narrative accompanies the data summarized in the tables.

What standards might be applied in judging the veracity of this report? Guidance can be found in *The Program Evaluation Standards: A Guide for Evaluators and Evaluation Users* (Yarbrough, Shulha, Hopson, & Caruthers as cited in Mertens, 2015). The *Standards* specify five attributes that can be used to judge an effort such as we have undertaken with this report: 1. Utility – the credibility of the evaluators and the usefulness and appropriateness of the evaluation; 2. Feasibility – the extent to which the evaluation can be successfully carried out in a particular setting; 3. Propriety – whether the evaluation is humane, ethical, moral, proper, legal and professional; 4. Accuracy – whether evaluation results are valid, reliable and trustworthy; and 5. Evaluation Accountability – the extent to which the quality of the evaluation is assured and controlled.

Our intent has been to carry out the responsibilities of the IM in line with these standards. Both the IM and Dr. Nelson have a long history in bilingual education and program evaluation in the public schools, and have been involved over many years with bilingual education program evaluation issues and the education of ELs (e.g., Nelson, Navarrete, & Martinez, 1997). Credibility in mixed methods research further depends, in part, on whether the researchers have spent prolonged and persistent engagement in the setting, have triangulated findings across multiple sources of data, and have involved stakeholders in the construction of the narrative that summarizes and interprets the results of the data collection efforts (Mertens, 2015).

Over the past four and one-half years, we have made regular visits to schools in DPS, visiting for one-week of data collection nearly every month of the school year. We have collected data from multiple sources at multiple school sites as well as at the DPS Central Office. Our interpretations of those data reflect what we have seen consistently across data sources and sites. We have also participated in conference calls among the parties, attended in-person meetings among the parties and, on several occasions, participated in video conferences with DPS staff. In the preparation of this current report and our previous reports, we have sought the feedback of all the parties on a draft report before we submit a final version, and we have tried to reflect their perspectives in our preparation of the final report.

Our efforts have been guided by the content of the CD, and the data collection instruments we have developed and used at multiple sites are based on the CD requirements. Consequently, we believe that the inferences we draw based on the data we have collected are valid (i.e. our inferences regarding level of CD implementation are accurate) and reliable (we have looked for consistency and triangulation in our findings across sites and data sources). Given our resources, we have collected data from as many sites and from as many sources as has been feasible. While our sample sizes are small compared to the overall number of ELLs in the District, we engaged in intensive data collection at each school site. Hence, the generalizability of our findings to the District overall and to the CD overall is grounded in the qualitative perspective of generalizability referred to as transferability (Mertens, 2015) - the extent to which stakeholders' experience aligns with our observations and conclusions, and which depends on "thick description" (i.e., detailed description of multiple cases) - rather than the quantitative perspective of generalizability (external validity), which depends in part on the proportion of a population that a sample size represents. By soliciting the feedback of the parties on a draft of this report prior to preparation of the final version, we have sought to take into account the perspectives of the parties in reporting our findings. We acknowledge that the parties may have different perspectives on CD implementation of the requirements laid out in these five chapters than our own.

Dr. Nelson and I have already completed our 2017 site visits and will make two additional visits in February and March of 2018 to complete the spot audits of the final five chapters as well as the remaining sections of Chapter 7. We are following a very similar process for collecting data on the remaining chapters. We will then complete an additional report (Report 7) similar to this one that will provide the results of the data we gather for those CD chapters.

Finally, I also want to apprise the Court that I have informed all of the parties of my intention to discontinue my appointment as Independent Court Monitor effective June 30, 2018. At that time, I will have completed five years in this role. I will have visited close to 140 schools in DPS and made over 35 site visits to the district. The progress that the DPS has made in meeting so many of the requirements of the CD during my tenure as Court

Monitor is notable. It has been professionally and personally gratifying to have played a part in this work. It continues to be a pleasure to serve the Court in this case.

Chapter 7: Considerations Related to Special Education and Section 504 Services for English Language Learners.

Method

Chapter 7 of the CD specifies seven types (Sections A through G) of IEP and 504 content or related actions that the district must address in the IEPs and 504 plans developed and implemented for English learners. Several of these seven sections further specify additional IEP and 504 requirements. Sections H through M of Chapter 7 deal with parent communication and translation services, and section N addresses teacher training. Our spot audit of Chapter 7 focused on Sections A through G, with our intent being to spot audit the remaining sections of Chapter 7 for Report 7.

In March 2016 we conducted spot audits of Chapter 7 requirements A through G at five schools:

- Knapp Elementary
- Place Bridge Academy
- Ashley Elementary
- Samuels Elementary, and
- South High School

The process we used for selecting schools is similar to the process outlined earlier this report. More specifically, we went to the January 15, 2016 report submitted by DPS to the parties. In Section 9.V.A.2, schools in DPS are listed alphabetically and we reviewed school level, ELA Designation, and the column which lists Total ELL and provisional count. The five schools we selected were a representative sample of schools in DPS. We identified three elementary schools (Knapp, Ashley, Samuels), a middle school (Place Bridge) and one high school (South). These five schools represented three different ELA designations including TNLI, TNLI and ESL Resource, and ELA E with Qualified Spanish Resource Teacher. The ELL and provisional counts ranged from 200-425 students which we felt were a sufficient number of ELL students to randomly select 10 IEPs at each school as part of our document review.

This was our first “official” spot audit and we based our approach on the pilot test of the Chapter 7 spot audit we had conducted in Fall 2015. In that pilot test, we had determined the amount of information (i.e., document review, interview, and direct observation, as appropriate to the CD requirements) we could likely collect in one-half day at a school, and our overall plan with the spot audits for Chapter 7 and subsequent CD chapters was to visit two schools a day. We selected several representative indicators from the Chapter 7 requirements that we planned to document at each school site and developed a Chapter 7 Spot Audit Checklist that we used to collect the information at each school (Appendix 1).

In choosing the representative indicators for Chapter 7, we concentrated on Sections A through G of the chapter since those sections specified CD expectations of IEP and 504 plan content that we felt we could document efficiently in a review of those documents during school visits given that we planned to be at each school for one-half day. The representative indicators we documented represent the sample of the evidence we could look at given our resources (i.e., time - one-half day at each school, and personnel - two of us looking at the documentation). We did not indicate to DPS ahead of time which indicators from each section of Chapter 7 we would be looking at; as far as district personnel knew before our visit, we could be looking at anything Chapter 7 required of special education and 504 process and documentation. As can be seen by examining the

Chapter 7 Spot Audit checklist in Appendix 1, we chose as representative indicators one requirement from CD Chapter 7.A. (focusing on IEP team membership), two from CD Chapter 7 F. (focusing on identification of the student as an ELL, the student's language proficiency, Program services, and any assessment accommodations provided), and one from Chapter 7.G. (which, among other provisions, requires an analysis of the link between language proficiency and student assessment results).

For Chapter 7, our primary intended data sources were the IEPs and 504 plans for ELs as well as the discussions we planned to have with a school administrator (Principal or Assistant Principal), a special education teacher, an individual responsible for 504 plans (e.g., a counselor), and the ELA Partner for the school. At each school, working with the special education teacher and/or the ELA Partner, we systematically selected up to 10 IEPs of ELs to review. School staff and the ELA Partner helped us identify ELs with IEPs at each school. Systematic sampling is considered as unbiased as random sampling and consists of drawing every "nth" record to get a specified sample size from a defined "population" within the school (e.g., drawing every 6th record from 60 EL IEPs to get a sample of 10 IEPs). Using this approach, we reviewed 10 IEPs at every school except Samuels, where we reviewed nine IEPs, so overall we reviewed 49 IEPs using the Chapter 7 Spot Audit Checklist. We did not record the total number of IEPs from which we sampled at each school. We reviewed paper IEPs or electronic IEPs, whichever the school had most readily available, and also looked at supporting documentation (e.g., assessment summaries) when that was included in an IEP folder (paper IEPs) or if we were directed to that information on the Infinite Campus (IC) by the teacher or ELA Partner.

We had planned to use the same sampling approach to review 504 plans, but the number of 504 plans for ELs at the schools we visited was small, so we worked with DPS, ELA, and other administrative staff to get later access to a sample of 504 plans for ELs that we reviewed after the visit. We reviewed 29 Section 504 plans provided to us by DPS – all of these were hard copies.

Results & Discussion

The results of our Chapter 7 spot audit are summarized in Table 7.1. In the table, the total for an item on the checklist may not match the total number of IEPs or 504 plans reviewed because if information seemed to be inadvertently missing (as opposed to information systemically missing – see below) or we couldn't interpret it, we left the item blank on the checklist for that particular IEP or 504 plan.

The table shows that 89.6% (43/48) of IEP teams included a fully qualified ELA-E or ELA-S teacher, as specified in the CD. Of the five IEPs that did not, two specified an ELA-T teacher and three did not include an ELA teacher. None of the IEPs included information on EL status and background that we expected to see in the Student and Family information section of the IEP (e.g., primary language spoken in the home, the student's primary language, whether the student has limited English Proficiency, whether an interpreter is needed for meetings). As we continued to encounter this, we learned from discussions with district personnel that IC was supposed to be populating this section of the IEP but this was not occurring. We drew the attention of the district to this issue that week, they acknowledged the problem, and stated they would work to fix the issue. We made a plan to follow-up in the next school year with a review of additional IEP forms to document whether this fix had occurred.

A later section of the IEP (Section 7F in the IEP form from the DPS website we were using as a reference) asks whether the student has limited English proficiency, and this section was filled out or was shown to us in IC for 75.5% (37/49) of the IEPs we reviewed. Section 7.F of Chapter 7 in the CD (not the same "7F" as the section in the IEP form referred to above) requires that ELs' IEPs document the type of ELA Program services the student is

Table 7.1

CD Chapter 7 Section	Evidence Checked	% of IEPs with expected information (N=49)	% of 504 plans with expected information (N=29)
7.A. "IEP and 504 teams shall include a fully qualified ELA-E or ELA-S teacher . . ."	Team membership on attendance/signature page. Check with School regarding ELA-E or ELA-S status	89.6% (43/48)	100% (28/28)
7.F. "ELLs' IEPs and 504 plans shall document that the student is an ELL, the student's language proficiency level. . ."	504 Plan, Page 1, Section E filled out. IEP, Page 1, Section 3 ELL information filled out. IEP, Section 7F filled out.	0% (0/49) 75.5% (38.8% ,19/49, filled out on form 36.7%, 18/49, in IC)	100% (29/29) Not applicable
7.F. "ELLs' IEPs and 504 plans shall document . . . the Program services the student is receiving (i.e., ESL/ELA-E, TNLI) . . ."	Documentation of the Program services the student is receiving (i.e., ESL/ELA-E, TNLI)	72.9% (35/48)	100% (27/27)
7.G. "The district shall maintain in all ELLs' IEPs or 504 plans . . . (b) an analysis of the effect of proficiency in English and other languages on the student's learning, including an analysis	Written evidence of the analysis	77.6% (38/49) Note: An additional 10.2% of the IEPs had an analysis of language arts skills but did not link the analysis to the student's language proficiency	86.2% (25/29)

of the student's assessment results in relation to the student's language proficiency"			

receiving; 72.9% (35/48) of the IEP forms included that information. In recording this information, we additionally noted on our data forms the type of Program service specified for those IEPs that included that. Of the 35 IEPs that specified type of Program service, 34 identified the following specific types of service: ELA-S, 26.5% (9/34); ELD, 23.6% (8/34); ELA-S & ELD, 11.8% (4/34); ESL, 8.8% (3/34); and ELA-E & ELD, 5.9% (2/34). One each (.03%, 1/34) specified: ELA-S & sheltered English; ELA-E; ELA E/S & ELD; English tutoring; ELA for ELs with disabilities; ELA E/S; and ESL/ELA-E.

Section 7.G of Chapter 7 requires that IEPs and 504 plans include "an analysis of the effect of proficiency in English and other languages on the student's learning, including an analysis of the student's assessment results in relation to the students' language proficiency." In order for us to check "Yes" on this item of the spot audit checklist, we required that, in some way, the IEP link language proficiency to the student's assessment results. For example, in a description of an EL student's language arts assessment performance on an achievement test like the CMAS, we might expect to see a statement linking the student's English language proficiency scores on the ACCESS test to the student's performance on the English language achievement test. For a student who is still developing proficiency in their second language, an achievement test in that second language is always at least partly a measure of language proficiency as well. We made this determination through dialogue based on our (the IM's and Dr. Nelson's) individual review of the IEP. In some schools, this dialogue included others who were present as we reviewed the documents (the Principal, the special education teacher, the ELA Partner). As table 7.1 shows, we determined that 77.6% (38/49) of the IEPs we reviewed linked language proficiency data to the student's assessment results. An additional 10.2% (5/49) contained some analysis of the student's language arts skills but did not clearly link the student's language proficiency to assessment performance.

The district's 504 form is much shorter than the IEP form and, due to different federal and state requirements for IEP forms and 504 forms, doesn't prompt for as much detail as in an IEP. Table 7.1 summarizes the results of our review of the 29 Section 504 plans provided after our visit by DPS. The table shows that 100% of the 504 plans included the name of a fully qualified ELA-E or ELA-S teacher on the 504 team (7.A), documented the student's EL status (7F), and documented the program services received (also 7F). Eighty-six percent of the 504 plans in some way linked assessment results to the student's language proficiency; in many of them this was a statement to the effect that limited English proficiency was not the cause of the student's learning problems.

Overall, our spot audit of Chapter 7 showed that about three-quarters of the IEPs included information on three of the five representative indicators we documented and about 90% met the fourth. The one indicator for which we did not find information was the one that the IC was not populating. As noted above, we drew this to the attention of DPS administrators during the week that we conducted the Chapter 7 spot audit. In later meetings during 2017 that we will detail in Report 7, DPS described for us how the district has addressed this issue and, as also noted above, we will spot audit a sample of IEPs in Spring 2018 to verify whether, as a result of the fix DPS described to us, the information that was missing in our first spot audit of Chapter 7 is now included in IEPs for ELs.

One hundred percent of the 504 plans we reviewed as part of our Chapter 7 spot audit had the expected information for three of the four indicators we documented. Nearly 90% of the 504 plans contained information for the fourth indicator.

Our Chapter 7 spot audit was a partial audit of the chapter, and focused on Sections A through G of Chapter 7. We did not examine documentation of the translation requirements in Sections H through M or the teacher training requirements in Section N, so our conclusions regarding the degree to which DPS is implementing Chapter 7 requirements apply to Sections A through G, from which we chose the representative indicators in our Chapter 7 spot audit checklist. We plan to document the District's level of implementation of requirements of Sections H through N during a subsequent visit.

Chapter 3: Parent Communication, Student Screening and Provisional Placement Assessments for Eligibility and Monitoring of Students Who Decline Services

Method

This chapter of the CD is sufficiently comprehensive that it required two separate site visits to Denver over the months of September and October, 2016, to complete. We made the decision to address this chapter by first convening meetings at eight school sites and interviewing parents of Program students at each school. The intent of these interviews was to gather information from parents that provided insight into the series of CD requirements that address Parent Communication, Student Screening and Provisional Placement, and Parent Permission for Initial Placement. In preparing for the September site visit, we also recognized that it would be imperative to review the procedures that schools use to register students and ultimately, the process that schools use to identify and initially place students to receive ELA Program services. In order to arrive at a greater understanding of these procedures, we requested to interview ELA administrators and secretarial staff at each of the school sites.

We selected the following eight schools to visit:

- Munroe Elementary
- Joe Shoemaker Elementary
- Marie Greenwood K-8
- John Amesse Elementary
- Smith Elementary
- CMS Elementary
- Valverde Elementary
- Abraham Lincoln High School

Denver Public Schools has a structure where schools are assigned to different networks. Our goal for this site visit was to select schools from as many networks as possible. At the time of our site visit, there were six elementary and four high school networks. The schools we selected to visit represent six of those ten networks. The eight schools we selected represented TNLI, Dual Language, and TNLI plus ESL Resource Models. The ELL population ranged from 156 ELs at Joe Shoemaker Elementary to a high of 587 ELs at Lincoln High School. We felt that these schools were a good representative sample of TNLI programs from elementary through high school and multiple networks across the district.

At each of the eight school sites, we interviewed parents using a Chapter 3 Parent Interview that we created (Appendix 2). The questions on the interview were constructed to provide information regarding representative indicators based on CD Chapter 3.II.A., which specifies information to be asked of parents on the Home Language Questionnaire, or HLQ (Items 1 and 2); 3.III.A. and B., which specify completion of the Parent Permission form (PPF) and lay out the procedures for informing parents about the Program (Items 3 through 7); and Chapter 3.I through 3.III in general (Items 8 and 9).

The IM interviewed parents in both English and Spanish. At schools where there were parents who spoke languages other than these, interpreters were requested by the schools and made available by DPS. At some meetings with parents, we were joined by the school's ELA Network Partner. Also, at Valverde and CMS Elementary, the parent liaison asked the principal if they could sit in and listen to our conversations with parents. We got the impression that at these two schools, the parent liaison has a very close relationship with many of the parents whom we interviewed. Nothing that we saw or heard suggested that parents were less forthcoming by having the Network Partner or parent liaison present during our interviews. We should note that interviews took place in a large group setting and not one-on-one. As noted previously, at some meetings Network Partners and/or the parent liaison were present and we sensed no apprehensions to have them join as passive participants.

We followed the parent interviews with a meeting of the school's team that is responsible for testing of students and initially placing them in the correct ELA Program based on completion of Parent Permission Forms (PPFs), Home Language Questionnaires (HLQs), and results of initial testing using measures such as the WIDA-ACCESS Placement Test (W-APT). At these school sites, the ISA Team is responsible for monitoring the progress of students whose parents decline ELA Program services. We discuss the issue of monitoring in more depth within "Chapter 2: ISA Teams" that is a part of this report. The school site specific teams that we interviewed typically consisted of an administrator such as the school principal or assistant principal, the Site Assessment Leader (SAL), an ELA-E or ELA-S teacher, and in some instances, an ISA Team member. Our conversations with these teams were more open-ended and less driven by a structured interview. We focused primarily on having them describe for us the process they use to screen and assess students for eligibility, as well as initially place students based on their PPF.

Prior to the September site visit, we reviewed the ELA Registration Secretary Checklist that every ELA Program school is required to follow. At each of the eight school sites we visited, we met with the secretarial staff responsible for organizing and implementing registration of students. Schools are allowed to modify the Secretary Checklist in a way that the works best for their school, however, they are responsible for completing the pre-registration, registration, and post-registration process aligned with the district checklist. The ELA Registration Process that DPS follows is carefully aligned with the CD requirements noted in Chapter 3. The ELA Administrator, Assistant Principal, secretarial staff and, ELA Network Partner at John Amesse Elementary modified their Secretary Checklist into a one-page format that we found user friendly, easy to follow, and that met all requirements of the CD and outlined by DPS. A copy of the DPS ELA Registration Secretary Checklist and the Amesse version of that checklist are contained in Appendix 3. The school registration checklists are intended to prompt school personnel to carry out the registration process as detailed in CD Chapter 3 sections I through III, and we used the checklists as a reference when we interviewed secretarial staff about registration.

The Chapter 3 Spot Audit Checklist we used to check registration records of students at the eight schools is included in Appendix 4. Our Chapter 3 Spot Audit checklist in Appendix 4 was designed to document, for a sample of students at each school, whether information specified in CD Chapter 3 sections I through IV had been recorded by the school. The specific Chapter 3 sections for which we collected data are identified in the checklist in Appendix 4. The first section of our checklist was used to collect data on Chapter 3.II, Student Screening and Provisional Placement; the second section of the checklist was used to collect data on Chapter 3.III, Parent Permission for Initial Placement; the third section of the checklist was used to collect data on Chapter 3.III.A, to check whether the school had a designated administrator or designee to explain ELA services (and trained to explain ELA services) and whether the school had a list of PPF3 students; and the fourth section of the checklist was used to collect data on Chapter 3.IV, which specifies assessment requirements for students provisionally identified as ELLs.

In order to more fully determine whether students were placed in the appropriate classrooms with a correctly designated teacher, we planned a second site visit to Denver during October, 2016. Our intent was to continue to gather information and evidence relative to placement of all eligible students in requisite English Language Development (ELD) classes and if they weren't placed, the reasons why. DPS has created two tools that we reviewed at the school sites as part of our data gathering during this visit. The first of these tools is the **ELL List** which we described earlier in this report. This is a tool that is available at every school. The ELL List identifies current ELs requesting services (PPF1, PPF2, No PPF) by school to ensure they are appropriately placed. It compares student information with teacher and classroom/course information. Each school has grade level groupings, as well as a summary by grade level. The report includes student assessment data, ELD enrollment, and primary language. By reviewing ELL Lists, we intended to document the level of correct placement of students according to their PPF designation (Chapter 3.II and, since correct placement depends on placing matching student PPF designation with teacher qualifications, Chapter 5.IV as well).

The second tool is the **ELL Summary.** This tool, which is an information tracker of sorts, compares registration and school placement data from one week to another, when school is in session. The report contains a list of the schools, service percentage for the district and individual schools, incorrectly and correctly placed students, the number of missing HLQ and PPFs, and total ELL count. Communication regarding any of the factors described above takes place in person, through email or phone with school staff or through the ELA Partner, and is captured in the Notes comment section by staff in the Strategic Planning and Accountability Office within the ELA Department.

More recently, the ELA Department shared with us, during the December 2017 site visit, another tool that they have created called the **Scorecard Brief**. This document is a summary one-page tool that provides insight into ELA metrics grouped into four categories: Student and Teacher Alignment, Parent Options and Engagement, Course Enrollment, and Academic Progress. It also features a school/network/district profile with enrollment counts, languages count, center program identifiers, and ELA Program Model identifier. The **Scorecard Brief** was in development during our October 2016 visit although we reviewed a sample of what they will look like.

The eight schools we visited during October of 2016 were:

- Bruce Randolph Middle School
- Martin Luther King Jr. Early College
- Ashley Elementary
- DCIS at Fairmont
- Samuels Elementary
- Valdez Elementary
- South High School
- Maxwell Elementary

We continued to follow the school site visit selection process outlined earlier in this report. Using Report 9.V.A.2. from the July 2016 ELA Program Report to the parties, we identified five elementary schools, one middle and two high schools that we wished to visit. The elementary schools represented three program designations; TNLI, TNLI and ESL Resource, and Dual Language. Bruce Randolph Middle School is designated TNLI and of the two high schools, MLK Early College is designated TNLI and South High School is designated ELA-E with a Qualified Spanish Resource Teacher. Even though we had visited South High School previously, we selected them again based on a conversation with an ELA

Network Partner who mentioned that their ELD teachers were excellent. Further, we requested to interview three of their designated ELD teachers which proved to be insightful. Based on their preparation and experience, they all seemed highly qualified. The number of ELs identified at the eight schools ranged from a low of 129 at Maxwell Elementary to a high of 386 at South High School.

Following is a summary of the data that we collected during our September and October 2016 visits. We first summarize data from the September visit, beginning with parent interviews, followed by a summary of our conversations with the teams that assess and place students at each school. This is followed by the evidence we collected from secretaries regarding registration and then by a summary of the spot audit we did of systematically selected individual student records.

Then, we summarize data from the eight schools we visited in October, when we reviewed each school's ELL List and identified percentages of eligible students enrolled in ELD and correctly placed in ELA-E and ELA-S instruction based on their PPF designation.

Results & Discussion

Parent Interviews

We interviewed a total of 36 parents at the eight school sites during the week of September 12-16, 2016. The languages of the parents included Spanish, Persian, Vietnamese, Arabic, Somali, and an East African dialect although that grandparent also spoke English. At some schools, the IM conducted the interviews in Spanish if all parents there were Spanish speaking. At Valverde Elementary we were joined by an Arabic and Spanish interpreter. At Abraham Lincoln High School, which had the largest participation of parents, I conducted the interviews in English with a Vietnamese interpreter with one group of parents and a Spanish speaking interpreter with a group of ten parents. The Somali parents spoke English and did not need an interpreter. We asked the parents a total of eight questions from the Parent Interview and, in the tables that follow, each question reflects the frequency of responses we received and a corresponding percentage.

Our goal was to speak with as many parents as possible during the week. Once dates of school visits were confirmed, parents were invited to participate in a conversation with us. In all of the cases as we understood, parents volunteered to participate. In some cases, invitations went out through the PAC. At Valverde Elementary, the principal worked with the parent liaison and invited parents. At CMS, the parent liaison sent a note home with students and followed up with phone calls to some parents, especially those who are most active. At Lincoln High School, the Spanish speaking and Vietnamese speaking parent liaisons invited parents. At Amesse Elementary, the recently appointed assistant principal and one of the paraprofessionals invited parents who often volunteer at the school or serve on the PAC. At Joe Shoemaker, the principal informed us that notes inviting parents had been sent with students. We did not interview any non-ELL parents during the week.

Question 1: Did you fill out a Home Language Questionnaire (HLQ) when your child registered here at school?"

Table 3.1

Completion of HLQ	Number	Percent
Yes	35	97
No	0	0
Don't Remember	1	3

Our first question revealed that 35 of 36 parents (97%) noted that they had completed a Home Language Questionnaire at Registration or at the school prior to Registration. Only one parent (3%) could not recall if they had completed the HLQ even though the interpreter asked the question in multiple ways and used several prompts. There were no parents who indicated that they had not completed an HLQ.

Question 2: How many of you stated on the HLQ that the primary language you speak at home or by your child was Spanish (or a language other than English)?

Table 3.2

Primary Language	Number	Percent
Spanish is primary language	28	78
Language other than English / Spanish is primary language	8	22

When asked what language was spoken at home or by their child, 27 parents (75%) indicated that Spanish was the primary language. This included the parent/guardian who didn't recall completing the HLQ, but he noted that Spanish was the primary language spoken at home. Of note, the young man I am making reference to informed the interpreter and I that he was an uncle living in Denver and a niece had been sent to live with him so that she could attend school. Even though he was not technically her parent, he acted as her guardian. Nine parents (25%) noted that a language other than English (and Spanish) was the primary language spoken at home. The four languages identified were Vietnamese, Arabic, Somali, Persian, and an East African dialect.

Question 3: Did the school provide you with an ELA Parent brochure that explained the two options for the language used to teach your child?

Table 3.3

ELA Parent Brochure	Number	Percent
School provided brochure	35	97
School did not provide brochure	1	3

We asked parents if the school had provided them with an ELA Parent Brochure at the time that they registered their child. A total of 34 parents (97%) apprised us that the school had provided them with the Brochure. Two Spanish speaking parents (6%) said that they had not seen the Brochure. One of the two parents informed us that there is a lot of paperwork that is provided to parents at Registration and it might have been one of the papers they gave her. Another parent commented that she had gone to the school prior to attending Registration and that the secretary of the school had given her the Brochure to read at that time. We counted this response as part of the total of 35 noted above.

Question 4: Did you view a video at registration explaining the language instruction options?

Table 3.4

Video Shown at Registration	Number	Percent
Yes	31	89
No	5	11

When asked if the school had provided a video at Registration that described the two language instruction options available for their children, 31 parents (89%) answered affirmatively. Five parents (11%) indicated however, that they had not seen the video. One of those five parents further clarified that she wasn't sure if the video had been provided for her at Registration but since she didn't recall, she would probably have to say that she didn't see it.

Question 5: After viewing the video and going over the brochure, did you understand the two Language Instruction options?

Table 3.5

Did you understand the two language instruction options?	Number	Percent
Yes	33	92
No	3	8

This question generated a great deal of discussion during interviews. Several parents voiced their opinion about the importance of instruction in Spanish. In Table 3.5, of those parents we interviewed, 33 (92%) responded that they did understand the two language instruction options. Three parents (8%) however, stated that they weren't clear about the two options. One parent clarified that she wanted her son to learn English as soon as possible but that the secretary had spoken to her several times about the importance of her child receiving instruction in Spanish and that he would be learning English as well. One parent of a high school student who had recently enrolled at the school shared with me that he had received very little education in Mexico. He went on to say that the Registration was very overwhelming for him and he didn't quite understand all of the things that had been presented to him. The family liaison from that school was present during our interview and I asked him if he would like to meet with her and have the two options explained in more detail. They were still talking when I left the school.

Question 6: Was someone at the school able to answer questions you had about the two options?

Table 3.6

Was someone from the school able to answer your questions?	Number	Percent
Yes	34	94
No	2	6

Parents and guardians spoke favorably about the assistance they had received at Registration and at their school. Thirty-four of the parents interviewed (94%) informed us that someone from the school was able to answer any questions they had. Only two parents (6%) noted that their school was not able to answer all of the questions that they had.

Question 7 provided us with two pieces of important information. As shown in Table 3.7 below, nearly a third (33%) of the parents we interviewed found that the attribute they found most useful about registration was that the secretary at the school speaks Spanish. This was corroborated by principals and other school leaders we interviewed and report on later in this chapter. Almost every school team we interviewed made a reference to the fact that they make sure that as many staff as possible who speak Spanish (including secretarial staff) participate at Registration. Related to parent comfort level, 14% of parents found it useful that the school welcomed them there and four parents (11%) found that home visits were helpful. Additionally, four parents (11%) also found it useful that they received help filling out forms at Registration.

Question 7: What did you find most useful about the Registration process?

Table 3.7

Things you found useful about registration.	Number Who Responded	Percent
Secretary speaks Spanish	11	31
I'm happy about dual language program	1	3
They received (welcomed) us here	5	14
I like the SPED Program	1	3
Good teamwork between staff	2	6
My daughter got to meet her teacher	2	6
Registration helps to build a closer relationship with school	1	3
The home visits are helpful	4	11
If I have doubts, the teachers and secretary informed me	2	6
I get help filling out the forms	4	11
My kids are comfortable here	3	8

Question 8: How can the school improve the Registration process for you?

Table 3.8

How school can improve registration.	Times Cited	Percent
It's too complicated. Make the terms understandable.	5	14
The paperwork is very long	4	11
Have more help for Somali parents	2	6

Give more information on Seal of Biliteracy	3	8
Give more help to those from Mexico without education	3	8

One theme that we heard multiple times in our interviews is that whether parents fill out the registration forms on district computer workstations at schools or participate at the school site, Registration can be confusing for some parents of ELs. The responses to Question 8 in Table 3.8 above support this. Five parents (14%) felt that registering their students is too complicated of a process. Four parents (11%) felt that the paperwork they are required to complete is very long and there are many forms to complete. A husband and wife from Somalia (6%) expressed to us that during Registration, more help should be available for Somali parents. Similarly, three parents (8%) suggested that additional help should be made available in Spanish for those parents who have little to no formal education. Schools have begun to make information available regarding the Seal of Biliteracy and 8% of parents also asked for additional information to be made available.

ELA Registration Process

At all eight school sites visited during September, 2016, we interviewed either the secretary or secretarial team responsible for organizing Registration at their school. We utilized the ELA Registration Checklist to guide our interview questions. Every one of the eight schools had secretarial staff who met with us for up to an hour. One reflection is that each of the schools has a secretary or secretarial team with varying levels of experience overseeing Registration. In the case of one school, they hired a secretary less than two weeks before Registration and she organized the effort with the support of her principal and other teachers and staff. By contrast, a team of secretaries at another school had worked together on Registration for five years and, as one noted, "We are like a well-oiled machine when it comes to registration." One thing became apparent after our interviews - secretaries in DPS, at least based on our interviews, play a critical role in organizing and leading efforts to help register ELLs for school in concert with CD requirements. Equally important, if secretaries are bilingual, they assume an even greater role by interfacing with parents from that language group, usually Spanish speakers.

Question 1: Describe what you do prior to registration.

Table 3.9

How you prepare before registration.	Times Cited	Percent
Make sure everyone knows who point person is	6	75
Prepare enough copies of ELA brochure and other forms	7	86
View the video if necessary	2	25
Make sure all equipment (laptops) are working and headphones	2	25
Follow the checklist that ELA sent	4	50

All five items above are part of the ELA Registration Checklist that secretaries are provided with and expected to use as a guide to prepare to register ELs. There were a total of eight responders (secretaries) involved with these questions. Seven of eight secretaries (86%) cited the need to prepare enough copies of the ELA Brochure and other forms. Seventy-five percent of the eight secretaries commented that it is important for everyone participating in Registration to be clear on who the point person is. Two secretaries (25%) noted that it's important to view the video that is made available to parents and that same number suggested that all equipment, including laptops, should be checked to make sure that it works properly. Fifty percent of the secretaries commented that it is important to follow the Checklist that the ELA Department provides to make sure all requirements are met.

Question 2: At Registration, who gets an HLQ? What do you do with the completed HLQs?

Table 3.10

Who gets an HLQ at Registration?	Response	Percent
Parents of all new students	8	100
Parents can fill out HLQ at school too	1	13

All eight secretaries (100%) answered that parents of all new students must receive and complete an HLQ at Registration. Our interview notes suggest that schools typically set up a final or exit station that each parent must stop at before Registration is complete. The secretaries use that exit station as the place where required forms are reviewed including the HLQ. One secretary (13%) revealed that she has often had parents complete the HLQ at school if appropriate.

Question 3: If I were a parent and I came to Registration, how would it be set up for me?

Table 3.11

How registration is set up.	Elements Cited	Percent
We set up stations. For example, one for video, one where HLQ is handed out, FRL, school uniforms, and one to make copies.	8	100
Parents get brochure and watch video	6	75
Parents fill out PPF before completing registration	6	75

Tell them about Parent Portal	2	25
Inform them about ELA PAC and DAC	2	25
Show them our app (Blue Tree Apps)	1	13
No video because ISA Team is always there	1	13

We asked secretaries at all eight schools to walk us through the Registration process as if we were parents registering our child for the first time. All eight secretaries (100%) revealed that they set up stations usually in the cafeteria or other large space at the school. Six (75%) of the secretaries commented that parents must complete a PPF at registration if they have not done so previously. Six of the eight secretaries (75%) commented that we would receive the ELA Brochure and stop by the station where the video is played almost continually during the day. Only one secretary (13%) apprised us that they don't show the video because the ISA Team is always present at Registration and they prefer to speak with parents face-to-face after they review the Brochure and answer any of their questions. One secretary (13%) noted that their school has purchased an app which parents can download on their phone. They purchased this from Blue Tree Applications, and they set up a station where it is demonstrated for parents and they are given help downloading it if requested. The App or Application, has been embraced by the school and parents. Two secretaries (25%) informed us that if we were parents, we would be given information at Registration regarding the district's Parent Portal and the ELA PAC and DAC.

Question 4: Who answers any questions parents might have about PPFs?

Table 3.12

Who answers questions about PPFs for parents?	Person(s) Cited	Percent

I do (secretary)	6	75
Principal or AP usually there to also answer questions	2	25
The point person is the one	2	25
Secretary does final check and review	2	25

In response to the question about who responds to questions that parents might have about PPFs, six (75%) of the secretaries informed us that they often answered questions about PPFs for parents. Our follow-up question was, "What happens if you don't have an answer to a question from a parent?" All of them replied that they would direct the parent to the principal, point person, or a staff member who could respond to the parent. Two of the eight secretaries (25%) apprised us without prompting that the principal or assistant principal or the point person is typically the one to answer parent questions about PPFs if the secretary was not able to do so. Finally, two secretaries (25%) responded that they review every registration packet before the parent exits to make sure the PPF is completed.

Question 5: What procedures do you follow after Registration is completed?

Table 3.13

Procedures followed after registration.	Times Cited	Percent
Enter HLQ and PPF data into Infinite Campus	8	100
Provisional ELs are scheduled in ELA classrooms temporarily	2	25
ELs are WAPT tested by SAL or a teacher	4	50

All eight secretaries or teams of secretaries (100%) commented that they enter all HLQ and PPF data into Infinite Campus immediately after Registration. Four of the secretaries (50%) commented that after Registration, ELs who have not been tested on the WAPT are tested either by the SAL or sometimes even by a teacher who is qualified to do so. Two of the eight secretaries (25%) responded that Provisional ELs are scheduled into ELA classrooms by the principal or the school scheduler after registration until a final determination is made of the student's placement.

Chapter 3 Spot Audit Checklist

To collect information for section 3.II of the Chapter 3 spot audit checklist (whether HLQs were documented for all students), we systematically sampled the records for 10 students at each of the eight schools and documented whether the results of the HLQ had been recorded for each student, including whether the student spoke a language other than English. The total number of registrants at each of the eight schools from whom we selected 10 individual student registration records to review were: Munroe, 53; Joe Shoemaker, 157; Greenwood, 129; John Amesse, 135; Smith, 199; CMS Elementary, 108; Valverde, 98; and Abraham Lincoln, 120.

Originally, we planned to document whether the HLQ was filled out, whether the HLQ information had been entered into the IC, and whether the HLQ had been scanned and uploaded into the IC. However, at our first school visit using the Chapter 3 Spot Audit checklist, it became apparent that we would not have time to check all three actions, as we had anticipated when we developed the checklist. We decided to focus only on documenting that the HLQ had been filled out, using either paper records or the IC (typically assisted by the school's ELA partner). We did not record whether an individual record was viewed on paper or through the IC.

The results of that part of our document review are summarized in Table 3.14. The table shows that, of the 80 individual student records we reviewed, 98.8% (79/80) had HLQ information recorded for the student. Seventy-eight records indicated whether the student did or did not speak a language other than English – on two records the information was missing or we failed to record the information on our checklist. Of those 78, 62.8% (49 students) were identified as speaking a language other than English while 37.2% (29/78) did not.

Table 3.14

HLQ Filled Out (N=80)	Language Other than English Indicated on HLQ (N=78)
Yes 98.8% (79/80)	Yes 62.8% (49/78)
No 1.3% (1/80)	No 37.2% (29/78)

Section 3.III of the spot audit checklist focused on documenting that the PPF form had been filled out and that the student's PPF category was specified. In the DPS registration process, a PPF is only filled out if the parents indicate that the student speaks a language other than English. Even though 49 HLQs indicated a language other than English, PPF forms were filled out for 52 students, a discrepancy of three students. Those 52 records were examined to determine the PPF category parents chose. Records examined at each school were those of EL students from sample we drew at the school for Section 3.II of our checklist.

The results of our document review for section 3.III of the spot audit are summarized in Table 3.15. That table shows that, of the 52 PPF forms we examined, a PPF category was specified on 50 – the other two either did not have PPF category information or we failed to record it. Of those 50 that contained the information, 54% (27/50) categorized the student as a PPF1 and 46% (23/50) categorized the student as a PPF2.

Table 3.15

PPF Filled Out (N=52)	PPF Category (N=50)
Yes 100.00% (52/52)	PPF1 54% (27/50)
No 0% (0/52)	PPF2 46% (23/50)

Section 3.IV.A of the spot audit checklist focused on whether students identified on the HLQ as having a language other than English had been assessed for their English language proficiency within 25 days of registration, as required by CD Chapter 3.IV.A.1, and which language proficiency assessment had been used. As noted in Table 3.14, 49 student records indicated on the HLQ that the student spoke a language other than English. Of those 49 student records, 30 had information on the date of registration, the date of assessment, or the type of assessment. Eleven of the remaining 19 records indicate that the students were at the early childhood level, for which assessment procedures differ. As for the other 8 of those 19 records, our data sheets contain notations indicating the data weren't available or the information was not clear.

Table 3.16 summarizes the results of this part of our document review. Of the 30 records reviewed, we were able to document which assessment had been used for 26 of the students, and we were able to determine whether the assessment had occurred within 25 days for 27 of the records. Four records either lacked information on the assessment used or we failed to record it, and for three records we were unable to determine whether assessment had occurred within 25 days. The table shows that 80.8% (21/26) of the students were assessed with the WAPT and 19.2% (5/26) were assessed with the CELA.

The table further shows that, of the 27 students for which the information was recorded, 85.2% (23/27) had been assessed for English language proficiency within the 25 day timeframe while 14.8% (4/27) had not.

Table 3.16

Initial English Language Proficiency Assessment (N=26)	% Assessed within 25 Days of Registration (N=27)
WAPT 80.8% (21/26)	Yes 85.2% (23/27)
CELA 19.2% (5/26)	No 14.8% (4/27)

Summary of Meetings With School Staff

At each of the eight school sites, we scheduled a meeting with a team of persons that usually included the principal or their designee, the Site Assessment Leader or SAL, and a teacher. SALs are selected by principals as part of the school's assessment team and are the official liaison between the ARE Department and the school. The SALs work closely with other assessment team members and collect valid assessment data consistent with testing protocols. After the registration process is completed, the SALs administer and score the WAPT. These results are then submitted to ARE and to the ELA Department. Sometimes the teacher taught ESL and at some schools, the person was an ELA-E or ELA-S classroom teacher. At several of the schools, we were also joined by an ISA Team member. At all eight schools, the ELA Network Partner for that school joined our conversation as well. We asked each principal or designee to give us a short profile of the school, an overview of the ELA program that they implemented there, and their thoughts on how services and support from the ELA Department could be improved. We also asked what happens at each school after Registration is completed. Following are a few impressions we gathered based on what amounted to more of an open-ended conversation at each school as opposed to a structured interview.

- Principals and their staff understand the CD requirements regarding Registration. They understand that there are numerous processes and requirements that the ELA Department has as part of the CD and we didn't get the sense that anyone was trying to shirk these responsibilities. There are roles that key staff play at Registration and we gathered that the leadership at each school understands this and provides support to assure that Registration is organized and carried out effectively.
- In general, ELA Network Partners play an essential role in supporting Registration and providing technical support as needed. The Network Partners are a key communication link between the ELA Department and the school.
- Most of the teams we interviewed spoke in very positive terms about their secretarial staff. We think there is a clear realization from these conversations that secretaries not only play a critical role in helping organize and implement Registration but, several principals spoke about how effective they are in working with parents, especially those who don't speak English.
- Almost every school that we were at had the Site Assessment Leader (SAL) present at our meetings. They clearly understand that upon completion of Registration, lists of students needing to be WAPT tested are sent to them from Armando Dominguez in the Assessment, Research, and Evaluation Office and that there is a 10 day window to complete the testing, and upload the scores into Infinite Campus.
- At the schools we visited, it was evident to us that they had gotten the message from Central Office not only that ELD is important but that the school is responsible for ensuring that students receive 45 minutes of ELD instruction

daily per the CD.

- The ELA Department monitors ELD placement daily.
- Four of the principals without asking or prompting spoke about the LAG. They credited their ELA Network Partner for providing support and training on effective use of the Guides. One principal commented that she and the ELA Partner used the LAG to structure a round of classroom walk-throughs. When these were completed, the principal said that the Partner told her, this is the minimum of what teachers need to do to implement the LAGs under the CD. Now, "let me show you how you can use them in an optimum way." We did not retrieve any additional information from that principal regarding the number of walk-throughs they conducted or how often they took place.

Finally, many of the teams we spoke with talked about building connections with parents and the need to keep improving this. Several of the teams also spoke positively about the DPS initiative to have schools make home visits.

Analysis of ELL Lists

To determine whether EL students were receiving instruction through DPS in line with their PPF designations, we reviewed ELL Lists generated by the ELA Strategic Planning and Accountability team. Those lists specify an overall “service percentage” (percent of EL students correctly placed in instruction base on PPF category) for the school and provide information on individual students such as PPF category, specification of the most recent English language proficiency assessment taken by the student, ELA-S or ELA-E Program designation, enrollment in ELD, and the student’s primary language. At the secondary level, the ELL Lists list the courses each student is enrolled in during that semester.

We reviewed ELL Lists at eight schools (one, Bruce Randolph, had separate lists for middle school and high school, and we reviewed both at that site) and the results of that review are summarized in Table 3.17. ELL Lists are generated weekly for each school. We were able to review early fall 16 (September or early October) service percentage reports at four schools, and reviewed later service percentage reports (mid-October and, in the case of one school, February 2017 on a return visit) for all nine schools. We hoped to review an earlier and a later Fall 2016 report for each school to determine if service percentages increased, but the ELL List reports are not saved in the DPS system due to the storage capacity that would be needed to save them, so we were only able to review earlier reports if a school had saved a hard copy of an earlier report.

We did not approach our review of the ELL Lists in the same manner as our review of individual student records in other parts of this report. Our focus was on identifying reasons why the service percentage might be lower than 100%, and we visually scanned the reports in the time we had at each school looking for mismatches and following up at the school on each mismatch or type of mismatch we found. As a result, we did not count the number of student records we scanned or the number of individual anomalies that we found, as getting a count of those was not our intent.

Table 3.17 shows that, early in the fall 2016 school year, service percentages at the four schools for which we had reports ranged from a high of 89.6% to a low of 46.8%. The ELA Department apprised us that every fall, schools report low service percentages. This is primarily due to a variety of factors that impact schools at the beginning of the semester such as the teacher designation timeline, "tagging" of all ELA course sessions, and a mismatch between the teacher and ELA designation of the course section. Bruce

Randolph's service percentage was particularly impacted by the large amount of sections needing an ELA tag.

When we compared service percentage between early and late fall 2016, service percentages were higher overall, with three schools showing service percentages of 100% (all EL students correctly placed), four having service percentages of about 95% or higher, one school with a service percentage of 82.2% and one with a service percentage of 78.3%.

Table 3.17

School	Early Fall 16 Service Percentage	Later Fall 2016 Service Percentage
South HS	83.6% (10/3/16)	100% (2/16/17)
Maxwell	79.5% (9/16)	100% (10/17/16)
Bruce Randolph MS	46.8% (9/12/16)	78.3% (10/17/16)
Samuels		98.9% (10/17/16)
DCIS at Fairmont	89.6% (10/3/16)	100% (10/17/16)
Ashley		96.4% (10/17/16)
Bruce Randolph HS		82.2% (10/17/16)
Valdez		94.5% (10/17/16)
Dr. Martin Luther King EC		95.1% (10/17/16)

At each school, we spoke with school staff about why a service percentage might be lower than 100%, and in some cases worked with school secretarial staff to examine paper records to verify the reasons. At the elementary schools, when students' instruction didn't match their PPF category, we found that this tended to be due to a PPF category being incorrectly recorded (e.g., a student classified as PPF1 for the ELL List was actually a PPF2 in IC or on a hard copy of the HLQ) or, on a couple occasions, because a teacher was classified as ELA-T rather than ELA-E or ELA-S, which showed up in the ELL Lists as a mismatch between teacher certification and student PPF category.

At secondary schools, where students are enrolled in multiple classes, service percentages lower than 100% were found to be due mainly to the fact that some teachers were not yet correctly classified as ELA-E or ELA-S in the system and, because each teacher taught multiple classes, every mismatch for each period the teacher taught counted against the school's service percentage.

Our review of the ELL Lists and our discussions at each school with administrators, teachers, secretarial staff, and ELA Partners satisfied us that most of the discrepancies between EL student category and the instruction they were receiving were due to these types of issues. In a few cases, we determined in our discussions with school staff that a student was indeed not receiving the instruction they should (ELA-E versus ELA-S) based on their PPF category. We also identified several students who should have been receiving ELD but weren't. However, as we probed and reviewed individual student records, it was clear that in most cases lower service percentages were due to "clerical"-type issues rather than to a mismatch between Program instruction and student profile.

Chapter 2: Instructional Services Advisory (ISA) Team

Method

During the week of November 14-18, 2016, our site visit to Denver focused exclusively on Chapter 2 of the CD which outlines the requirements related to Instructional Services Advisory (ISA) Teams. Previous to this site visit, the Independent Monitor had met with ISA Team members at numerous schools as part of an ongoing data collection effort. In fact, at most Meetings of the Parties prior to our November site visit, CHE and DOJ representatives often requested to meet with ISA team members and review their school's documentation regarding ISA activities. Additionally, the IM had attended three ISA team trainings that are a requirement for all members of a team.

The concept of an ISA Team is a unique aspect of the DPS ELA Program that is unlike the majority of other programs for ELLs nationally with which we are familiar. The framers of the CD truly exercised a vision of creating a school accountability foundation for meeting the needs of ELLs by requiring the district to assign an ISA Team at every Program school. The role of the ISA Team at each school is to make recommendations to the ELA Program regarding Program entry, redesignation, exit or reentry, and changes in services for students based on objective evidence. A general impression is that ISA Teams now meet this fundamental CD requirement more comprehensively than at any time previous to the November site visit.

In preparation for the November site visit, we selected six schools in which to interview ISA team members with the hope of observing several ISA team meetings actually taking place. The six schools we identified to visit were:

- Castro Elementary
- Beachcourt Elementary
- Greenlee Elementary
- North High School
- Marrama Elementary
- Hamilton Middle School

The six schools above were selected using the same process described multiple times in this report. We identified one middle school, one high school, and four elementary schools that comprised our representative sample. ELA Program designations among these six schools included TNLI, TNLI and ESL Resource, and ELA-E with Qualified Spanish Resource Teachers. We selected Greenlee because of its drop in EL students, they chose to participate in the small TNLI pilot undertaken by the district. The number of identified ELs ranged from 99 at Greenlee to a high of 364 at Castro Elementary.

As we had done previously, we prepared a Chapter 2 Spot Audit Checklist (Appendix 5) to guide our interviews and observations at each school. Section I of the Chapter 2 Spot Audit checklist was used to document CD Chapter 2.C., composition of the ISA Team; Section II of the checklist was used to document the training referred to in CD Chapter 2.D and Chapter 5.XI; Section III of the checklist was based on DPS's ISA guidebook which suggests documenting ISA meetings through meeting schedules, agendas, and minutes; Section IV of the checklist was designed to be used to document CD Chapter 2.A – C, the activities that occurred during ISA meetings we observed and the composition of ISA teams we observed; Section V of the checklist was designed to gather feedback regarding how the automated system was working and whether ISA teams had suggestions for improvements, and was based on the ISA responsibilities specified in Chapter 2.A and 2.B, and to collect information pertinent to CD Chapter 2.B.5 – how ISA teams weigh evidence in making redesignation decisions; Section VI of the checklist was used to summarize IC information from a sample of 10 individual students who had recently been reviewed by the ISA team, and was designed to document the types of information considered and the decisions made as specified in CD Chapter 2.A. and Chapter 2.B.

After we submitted the names of the schools to the ELA Department, we learned a week later that several schools had ISA Team meetings scheduled the week we planned to be there. As a result, we were actually able to observe ISA Team meetings taking place where student data was discussed and decisions regarding redesignation were actually made. Two of those meetings were scheduled after the school day (Hamilton Middle School and North High School). Observing the ISA Team meetings was very insightful. For example, a question that CHE and DOJ have posed to the district previously is how ISA Teams weigh or reconcile conflicting data relative to redesignation decisions. Additionally, DPS was into the second year of implementing an automated system to compile ISA data at the time of our site visit, and we were interested in assessing the effectiveness of this system since schools are now required to upload all related data into the system. Issues such as these are not explicitly stated in the CD but provide useful program and implementation information.

Prior to the 2016-2017 school year, much of the technical assistance provided to schools regarding ISA Teams was provided by ELA Network Partners assigned to those schools. In an attempt to streamline this system of information delivery and technical support, the ELA Program created a position for one Network Partner to be the point person on delivery of technical support, providing guidance to schools on requisite forms, and giving ISA team members updates on calendar events related to ISA Team training, redesignation windows, etc. In addition, this person would provide support to schools in helping them upload all necessary forms into the new automated system described previously. DPS made a strategic move by appointing Veronica Maes to this position. She is a veteran teacher and former principal with the district and has over 20 years of experience working with the ELA Program. DPS also hired a counterpart to Ms. Maes to oversee all similar Charter School ISA Team responsibilities. That person, Tanis Humes, works very closely with Veronica Maes, and their effect on providing key assistance and serving as the point person that ISA and CH-ISA teams can go to is a positive comment we heard consistently at the schools we visited.

At four of the six school sites visited, we observed an ISA Team meeting taking place. At two schools (Marrama and Greenlee), we observed simulated ISA Team meetings where team members and the principal walked us through the process they use during meetings. It was quite interesting to observe an entire team of school administrators and teachers reviewing individual student files to make recommendations to the ELA Department as outlined in the CD. Those discussions were usually thoughtful, collaborative, and objective. I did not see one single example of an ISA Team trying, for example, to redesignate a student for the sake of redesignation. In fact, we observed the opposite. At North High School we heard the Assistant Principal on the ISA Team make the comment, "She meets the ACCESS trigger but there are social-emotional issues that are very prevalent. She lacks confidence and talks about quitting school often. We need to work more closely with her learning community." We note this because it is an example of the ISA Team taking into consideration factors besides test scores. At Hamilton Middle School, we witnessed the ISA

Team spend almost 45 minutes discussing the writing scores of one student who was eligible for redesignation. At one point, the Principal intervened and asked the team to compare paper and pencil essays versus computer writing and suggested that the Team follow-up on reviewing the core instruction the student was receiving in writing, watch her progress, and check in with the classroom teacher. The decision was made to wait until the spring to reconsider redesignation.

Finally, we heard from several of the ISA Teams that they are having more and more transparent conversations, and that parents are being consulted more, not just as a recommended step, but taking into consideration what parents' opinions are. We also gathered that ISA Teams are moving more cautiously and understanding that it is not a bad thing or negative reflection on the school to recommend that students continue receiving ELA Program services rather than redesignating them. Most impressive for us however, was to actually observe ISA Teams deal with the issue of conflicting data and work as a team to resolve these issues or conflicts and make decisions that they feel are in the best interests of ELs.

Results and Discussion

Following are the results of our six school site visits. The tables and discussion which follow reflect the evidence we collected on our Chapter 2 Spot Audit Checklist. Even though we observed four actual ISA Team meetings and two simulated meetings, we report our findings in the tables that follow based on our observations at all six school sites.

Question 1—Who are the ISA team members in the six ELA program schools?

Table 2.1

Team Membership	Number of schools complying in each member area	Percent
Principal and/or admin designate	6	100
Fully qualified ELA-e or ELA-S teacher	6	100
Second teacher	6	100
Additional members	6	100

Of the six schools we visited, all schools had at least the requisite ISA team members and most of them had two or more additional members. For example, at Beach Court Elementary, the Principal and the Assistant Principal fulfilled the first required category. Then two ELA-E and two ELA-S fully qualified teachers fulfilled the next three required member categories. Similarly, at North High School, the Principal and AP both attended the ISA meeting as did five ELA-E or ELA-S qualified teachers as well as one SPED teacher.

Question 2--When did the most recent training occur for ISA team members?

Table 2.2

Number of program school ISA teams studied	Number of schools that attended ISA training in Sept or Oct each calendar year	Percent
6	6	100

For all of the six ISA teams studied, the team members received their training online through Moodle, a learning platform for educators. Team members reported that they like the online training since it provides a good overview of responsibilities. Online training was found especially helpful for new administrators.

Question 3--How often do school ISA Teams meet?

Table 2.3

School Visited	Number of ISA Team Meetings in 2015-2016
Marrama Elementary	6
Castro Elementary	7
Hamilton Middle School	5
Greenlee Elementary	9
North High School	14
Beach Court Elementary	14

Table 2.3 shows that the number of ISA Team meetings held at each of the six schools we visited ranged from five at Hamilton Middle School to 14 at both North High School and Beach Court Elementary. ISA meeting agendas and minutes, or notes, were reviewed at all six schools, usually by having the ISA Team Lead show us on their laptop computers. Google Docs is typically used for saving and sharing all meeting documentation.

Question 4A-- What documents were evident during the observation of ISA Team meetings?

Table 2.4.A

Types of ISA meeting documentation seen during six observations	Number of ISA teams with meeting documentation observed in each category	Percent
Meeting Minutes available	6	100
Meeting Agendas recorded	6	100

We sat in on four ISA Team meetings at six school sites during the spot audits. At two of the six schools, we met with the ISA Team although they did not have a meeting formally scheduled during the time we were there but presented a simulated meeting for us. Also joining us were the new Network Partner recently appointed to be the lead person between the ELA Department and the ISA Teams at each program school. In some cases, Network Partners who had been working with the schools where we observed prior to the new hire and appointment also joined us. Two of the ISA Teams had attendees present other than the team members, including a SPED teacher and an additional ELA-S teacher. We noted that, unlike previous observations where the ISA Team Lead kept minutes and agendas in a binder, all of the team leads showed us examples of computerized records such as Google Docs that they now used to store minutes, agendas, and even running records of notes, decisions made, etc. Table 2.4.A reflects that we reviewed meeting minutes and agendas at all six schools. Also, we were interested in learning how the new automated system was working for ISA Teams during the second year of implementation. When asked, ISA Teams reported that the new forms and automation system for saving and sharing documents was "absolutely better" and "more accessible and efficient". Much of this was attributed to the additional support they have received from the ELA Department and the new Network Partner point person.

Question 4B: What ISA activities were observed during the team meetings?

Table 2.4.B

Types of activity	Types of Evidence considered	DPS Forms filled out	Decisions and recommendations made	# of teams doing this activity	%
Reviewing services for newly identified ELs including newcomers to identify potentially inappropriate ID and placement	Lists of students to be served; network partners; student data on Infinite Campus	Forms sent from ELA office with deadline and follow-up; also PPF forms	Prepare EL lists and program model for each new EL; determine ELD block.	6	100
Monitor EL identification and placement	Student data such as WAPT, HLR, PPF; parent meetings;	Follow protocol set by ELA office	EL student placement can be changed if data suggest this is appropriate	6	100
Review ELP and academic progress of ELs, including PPF3 students	Grades, ACCESS scores, assessment data from PARCC, TCAP, CMAS, end of unit tests, ACT (HS), ELD student profile	Follow protocol set by ELA office	Redesignation decisions made from body of evidence for each student, monitoring, intervention	6	100
Identify ELs who need intervention to address students' instructional needs	Data from teachers, ISA team observations, ACCESS scores, assessments, grades, IEPs,,	Follow protocol set by ELA office	Academic, social, and/or emotional interventions	6	100

	social/emo development				

Table 2.4.B summarizes what we observed during the ISA meetings. In 100% of the ISA Team meetings we observed, each of the four target activities listed in the spot-audit checklist were conducted via focused, high level data-driven discussions guided by the body of evidence for each EL student when considering possible redesignation or needed interventions. We did not observe any teams considering re-entry decisions. One ISA Team member noted unprompted that the current level of scrutiny and concern for ELs didn't exist in the "old" DPS. Another ISA Team member commented, "I love what's happening here. The ELs get service." Thus, there is evidence of shared commitment across all the ISA Team members we observed to follow up, monitor progress through data, and keep checking in with the teachers.

V. Open-Ended Questions from Interviews of ISA Team members:

1. **How has the automated system used to compile ISA data for students been working for you? Do you have any suggestions for the District on how to improve it?**

Table 2.5.1

Summary of types of responses from the six ISA teams	Number of six ISA Teams who gave this response	Percent
We like it. It is working well for us and is very useful.	6	100
Last year it was frustrating and challenging but the glitches have been fixed.	4	67
It is easy to enter and pull out data. So much better than the binders.	4	67

As Table 2.5.1 shows, there was consensus among the six school ISA Team members that the automated data entry system is useful and working well for them now. There were multiple comments concerning the technical challenges and glitches they encountered during the first year of use, and the steep learning curve it took to learn the Infinite Campus system. But currently the automated data entry system is considered “trustworthy,” better than keeping binders, and “really useful.” Four of the six teams (67%) specifically cited the challenges of the automated system during year one of implementation as well as the ease they now feel in uploading and retrieving data. The ISA Teams did not talk at all about any work that needed to be done this year to correct past decisions that may have been misinformed such as more carefully monitoring exited students.

2. In redesignation decisions, how does your ISA Team weigh or reconcile conflicting data in cases where some data indicate a redesignation should be recommended yet other data indicate there should not be a redesignation?

Table 2.5.2

Summary of types of responses from the six ISA teams	Number of six ISA Teams who gave some version of this response	Percent
We weigh the body of evidence and decide how much weight to give each data point	6	100
We seek consensus of ISA team members	3	50
We gather input from families, classroom teachers, ELD and SPED teachers	6	100

We are cautious in making redesignation decisions. No rush.	6	100

Of the six ISA Teams that were interviewed concerning student redesignation decisions in the face of conflicting data, all six or 100% reported that they weighed a body of evidence including test and assessment data, observational data, and parent/teacher input before deciding. Three of the six ISA Teams (50%) mentioned that they seek consensus among the team members in decisions concerning redesignation. As one team member said: "We have a very strong ISA Team and we strive to look at as much data as we can and thoroughly." All of the ISA Teams were adamant about not rushing to redesignate.

In response to a later query we made while preparing this report, DPS provided guidelines regarding minimum scores on assessments that students must attain in order to be considered for redesignation that ISA Teams use when considering redesignation. For example, a student must score at least a 4 overall on ACCESS and a 4 on ACCESS Literacy. Our observations and interviews with the ISA Teams were conducted before the new WIDA standards were implemented.

Analysis of Individual Student Records

As part of our Chapter 2 spot audit, we systematically selected 10 EL student ISA records to review at each of the six schools we visited. We did not record the total number of students reviewed by the ISA Team at each school from which our samples of 10 at each school were drawn. The results of that review are summarized in Table 2.6.

Table 2.6

Type of Decision	Number	% of Total	Outcome	Evidence Cited
Redesignation	27	45.0%	Redesignate: Yes 56% No 41% In process 4%	ACCESS 100% Grades 81% WIDA 30% CMAS 7% iStation 4% DRA 4% Rng. rec. 4%
Identification	32	53.3%	Identify as EL: Yes 100% No 0%	WIDA 94% WAPT 55% iStation 13% Reading 7% DRA 7%
PPF3 Monitoring	1	1.7%	Not specified	Not specified
TOTAL	60			

Table 2.6 shows that 45% (27/60) of the ISA decisions focused on redesignation, 53.3% (32/60) focused on identification of students as ELs, and one record (1.7%) focused on PPF3 monitoring. The table also shows that, of the 27 students who the ISA teams considered for redesignation, 56% were redesignated, 41% were not, and 4% were still in process. Of the 32 students the ISA Teams considered identifying as ELs, 100% were identified. No information was available as to the PPF3 monitoring (i.e., whether the student was or was not judged by the ISA Team to be making progress). The far right column of Table 2.3 shows the evidence used by the ISA Teams as the basis for their decisions. ACCESS scores and grades were used most frequently by ISA Teams as the basis for redesignation decisions. WIDA and WAPT were used most often to make identification decisions. Assessments used in one case of PPF3 monitoring were not specified. In a follow-up communication with us as we prepared this report, DPS noted that the reason we did not document PPF3 monitoring decisions in our document review was that the PPF3

"window" (the time period during which ISA Teams focus on PPF3 monitoring decisions) had just opened, whereas the identification and redesignation windows had just closed. We also did not observe Year 1 and 2 monitoring required after redesignation prior to Program exit. Because we were not able to review PPF3 monitoring documentation or post-redesignation Year 1 and 2 monitoring, our conclusions regarding Chapter 2 implementation based on this part of our Chapter 2 spot audit are limited to the identification and redesignation documentation we reviewed.

Chapter 8: Charter Schools

Method

Our last visit of 2016 focused on Chapter 8 of the CD, Charter Schools. During December, we spent five days on-site and visited seven charter schools. Our initial plan was to visit six charter schools. We made the decision to select two elementary, two middle, and two high schools. We reviewed the July 2016 ELA Program Report that the district submits to the parties. Charter schools do not have ELA designations but they do provide data on total number of ELLs and Provisional ELLs served. This information was found in Section 9.V.A.1. We wanted to visit schools that served large numbers of ELLs and those that served smaller numbers of ELLs. STRIVE Prep Ruby Hill for example identified 191 ELs while Highline Academy which is also an elementary, identified 44 ELs. After selecting six schools, we added a seventh one (Denver Language School) because of its focus on Spanish and Mandarin Chinese language immersion. Denver Language School has both an elementary and middle school program and identified 99 ELs in both programs.

During December 5-8, we visited the following charter schools:

- Denver Language School
- Girls Athletic Leadership Schools (GALS)
- DSST College View Middle School
- Rise Up
- Highline Academy NE
- STRIVE Prep Federal
- STRIVE Ruby Hill

In addition to meeting with charter school teachers and leaders, we met with district central office leadership and several ELA Program staff including Nadia Madan

Morrow, Director of Leadership and Program Management, and Tanis Humes, who manages the Ch-ISA process very similar to what Veronica Maes does for the district. During that meeting, DPS overviewed the process used for monitoring ELL services in charter schools (CD Chapter 8.A) and for charter renewals (CD Chapter 8.C). We also met briefly with Chris Gibbons, the founder and CEO of STRIVE Preparatory Schools. He participated in our session at STRIVE Prep Federal. During our final debrief, we also met with members of the Portfolio Management Team which supports autonomous schools in DPS including charter schools. During that debrief, Maya Lagana, Senior Director of Portfolio Management, and Angie McPhaul, Manager of Accountability, discussed the charter review process with us.

Chapter 8 of the CD consists of three paragraphs that, first, specify that charter schools, like all DPS schools, "take appropriate action to overcome language barriers that impede meaningful and equal participation by all students enrolled in the District's instructional programs." Chapter 8.A and 8.C then describe the District's responsibility to monitor identification of, services for, and assessment of ELLs in charter schools, while 8.B requires that each charter school identify a school administrator with ELA expertise who is responsible for providing oversight and monitoring the effectiveness of ELA services at the school. Our focus in monitoring Chapter 8 implementation at the school sites was to document whether the charter schools we visited were making the same educational alternatives and language acquisition services available to ELLs as non-charter schools. Toward this end, we prepared a Chapter 8 Spot Audit checklist (Appendix 6) that further focused on four areas:

1. Administrator/Administrator Designee Interview

2. ELL Lists and the ELD Scheduling Report
3. Charter ISA (Ch-ISA) Team Process
4. Ch-ISA Team Meetings

Section I of our spot-audit checklist focused on CD Chapter 8.B, whether the charter school had identified an administrator with ELA expertise and how that administrator provided oversight for and evaluated the effectiveness of ELA services at the school. Section II of our spot-audit checklist was designed to determine whether Ch-ISA Teams were carrying out their responsibilities in the same manner as ISA Teams at non-charter schools, and the checklist items in that section of our spot-audit checklist focused on ISA activities specified in CD Chapter 2.A through 2.D. The results of the spot audits and additional information collected for the chapter are summarized in the following tables both quantitatively and qualitatively as appropriate. A short narrative accompanies the data summarized in each table.

Results and Discussion

Table 8.1 provides a profile of the charter schools we visited. The seven schools serve 858 English learners with 787 (92%) of those being Spanish speakers. The most glaring issue we noticed however, is that only 34 (0.4%) are ACCESS Level 1 students and 41 (0.5%) are ACCESS Level 2 Spanish-speaking ELs. In short, less than 1% of the Spanish-speaking English learners in these 7 charter schools are ACCESS Level 1 and 2 students (i.e., the lowest two levels of English proficiency), an issue that has been brought up by CHE and the DOJ on several occasions. Moreover, two schools had no ACCESS level 1 and 2 ELs, and two more enrolled just one level 1 or 2 EL.

In response to our first draft of this report, DPS made the following points regarding the previous paragraph:

1. Many Access 1s and 2s are in newcomer centers and there are no Charter Newcomer Centers. In addition, lower ACCESS proficiency students are also more frequently in District TNLI schools and there are not many TNLI Charter Schools.
2. DPS overall is seeing fewer ACCESS 1 and 2s in all schools because of demographic shifts.
3. Five of the charter schools visited are secondary schools which tend to serve fewer numbers of ACCESS 1 and 2 students overall.

The District further noted, "To increase the number of 1's and 2's at Charter schools, the District's Choice office is requiring that Charters leave open seats in the fall to be able to take late arrival students who may be lower ACCESS levels."

Table 8.1

Charter School	Total EL Count	PPF 1 Count	PPF 2 Count	Count of Spanish-speaking ELLs	Spanish-speaking ELLs and ACCESS	
					Level 1	Level 2
STRIVE Ruby Hill	280	153	126	268	24	25
STRIVE Federal	204	137	57	202	4	7
Rise Up	29	13	12	28	0	0
GALS MS	29	12	13	25	0	1
GALS HS	13	6	5	12	0	0
Highline Academy NE	84	21	60	56	3	6
Denver Language School	72	19	29	54	2	2
DSST College View MS	160	103	42	154	1	0
TOTALS	**871**	**464**	**344**	**799**	**34**	**41**

As noted above, Part I.A of our spot-audit checklist (Questions 1-6) was directed toward each charter school administrator or their designee and was based on the requirements of CD Chapter 8.B. Following are the findings we gathered for questions 1-6 and a brief discussion of those findings.

Question 1--Does the school have an administrator or designee with ELA expertise?

Table 8.2

Administrator/Designee	Completed ELA Teacher Qualifications Requirements for Charter Schools	Percent
7	6	86

At the seven schools that we visited, six of the ELA Administrators had completed all ELA Teacher Qualifications requirements. One ELA Administrator had recently been appointed to that role in his school and he was On-Track for completion but still needed several modules before meeting the requirement. We should note also that in April 2017, I followed up to assess the progress he was making while On-Track. I was informed that this individual was no longer employed at the charter school and was replaced by an ELA Administrator who had completed all TQ requirements. I was able to verify this.

Question 2--Is there evidence that the Administrator or Designee has ELA expertise?

Table 8.3

Evidence Across Qualifications	No. of ELA Admin./Designee	Percent
BA Degree in related field	7 of 7	100
3 years teaching experience with ESL/Bilingual Education	7 of 7	100
3 years administrative experience with ESL/Bilingual Education	6 of 7	86

Six of seven ELA Administrators had completed an MA degree or higher in a related field. Areas of specialization included; Language and Literacy, Urban Education, ESL, Education Leadership, and Curriculum and Instruction. Of the seven ELA Administrators, one had three years teaching experience in DPS, one had four years of experience in Aurora, and the other five had five years of experience or more. The one ELA

Administrator who did not have a minimum of three years administrative expertise had been appointed shortly before we completed our site visit. He was also the person who was on track to complete his ELA Teacher Qualifications requirements. Finally, he is the same person whom we learned no longer worked at that charter school four months later when we did a follow-up. He had been replaced as the ELA Administrator by someone who met all three qualifications above.

Question 3--What training has DPS provided on evaluating effectiveness of ELA Services?

Eleven different forms of or specific types of training were identified by the ELA Administrators we interviewed in response to Question 3. We would like to note that Questions 3 through 6 in our Chapter 8 spot-audit checklist are open-ended questions and that administrators could provide more than one response to each question; as a result, the questions evoked a variety of responses to each question rather than responses that centered on several main points.

In response to Question 3 on the checklist, all seven (100%) of the ELA administrators reported that they attended at least one of the types of training identified in Table 8.4. Four of the seven interviewees (57%) identified the required teacher qualifications coursework as the training that addressed the issue of evaluating ELA services effectiveness. On the opposite end, one teacher, representing 14% of those we interviewed, cited Literacy for ELLs as the training that dealt with Question 3. Administrators, without prompting, noted that DPS has provided them with good training opportunities in order to more effectively evaluate ELA services.

Table 8.4

Specific Training	Number Who Listed This Training	Percent
Teacher qualifications coursework	4	57
Collaborative team approaches	3	43
ISA team training	2	29
ELA administrator institute	3	43
Progress monitoring of students	3	43
Literacy for ELLs	1	14
Connection with parents	2	29
Evaluation and pre-evaluation	4	57
EL achieve training	2	29
Classroom walkthroughs (with Nadia Madan)	3	43
ELA teacher quality rubrics	2	29

Question 4--How does the ELA Administrator/Designee provide oversight of ELA services?

Table 8.5

Strategies for Providing Oversight	Number Who Cited This	Percent
Created Google forms for walk-throughs	2	29
Ch-ISA training or sitting in on Ch-ISA meetings	5	71
Progress monitoring (review student data, pull grades, review student work samples, attendance)	6	86
Ongoing meetings with grade level teachers	3	43
Review assessments for EL Achieve	4	57
Review the HLQ and WAPT	3	43
Meet with parents	2	29

Meet weekly with instructional coaches	2	29
Meet with ELD teachers monthly	2	29
Use achievement block	1	14
Look at equity and inclusion artifacts	1	14

Table 8.5 shows that the oversight strategies cited most often were progress monitoring (86%), Ch-ISA monitoring (71%), and reviewing EL ACHIEVE assessments (57%). Strategies cited least often were the use of achievement blocks or looking at equity and inclusion artifacts (14%) and creating Google forms for walkthroughs (29%). Five of the seven ELA Administrators spoke about or alluded to the importance and value of coaching and mentoring regularly. Six of seven administrators addressed the importance of working closely with and, in some cases, serving on the school's Ch-ISA Team. All the ELA Administrators whom we interviewed provided at least two strategies for providing oversight.

Question 5--How does the ELA Administrator evaluate the effectiveness of ELA services?

Table 8.6

Evaluation Strategies	Number Who Cited This	Percent
Continuous student data review	7	100
Evaluation of every teacher	3	43
Schedule data days	3	43
Monitoring of student progress	4	57
Use EL achieve rubrics	3	43
Meet with ELD teacher monthly	3	43
Analysis of achievement scores	3	43
Analysis of writing scores (quarterly)	2	29
Assessment of daily exit tickets	1	14

Teacher coaching	3	43
Ongoing observation of teachers with feedback	4	57
Review ACCESS growth	2	29

Table 8.6 shows that all administrators reported using continuous student data review to evaluate ELA services, followed by monitoring of student progress and ongoing observation of teachers with feedback (57% each). Least used were assessment of daily exit tickets (14%) and reviewing ACCESS growth or analysis of writing scores (29% each). The themes or strategies discussed by the ELA Administrators were consistent regarding evaluation of ELA services at their school. Every administrator noted that they are involved in continuously reviewing student data, especially in teams. Multiple tools and measures seem to be used to evaluate effectiveness. The process of evaluation of effectiveness is ongoing, collaborative, data driven and structured, based on the responses we received to this question.

Question 6--How could DPS provide more support for ELA administrators?

Table 8.7

Recommendation	Number Who Cited This	Percent
Need more feedback especially concrete	2	29
Curriculum related support	1	14
Access to infinite campus forms	1	14
"Show me not tell me" examples for first year teachers	1	14
Strategies for dealing more effectively with students who have psychological and social work related issues	1	14

DPS and CDE agreement on success of early literacy	1	14

Question 6 on our checklist was designed to get feedback from the charter school administrators regarding additional support the District could provide charter schools as the District oversees and monitors ELA services at the schools (CD Chapter 8.A). As Table 8.7 shows, there was no consensus as to how DPS could provide more support for ELA administrators, with only two administrators citing the same suggestion – more "feedback, especially concrete." Four of the seven ELA Administrators made positive comments about the support they get already. Two administrators noted that they feel comfortable calling the ELA Program office at any time when they have questions. One administrator made the unsolicited comment that she and other school principals would appreciate "a fresh eye and more concrete feedback."

Part I.B of our Chapter 8 spot-audit checklist focused on Ch-ISA Team meetings, and the results from that section of the checklist are summarized in Tables 8.B.1 through 8.5.

Question 8B1--How often does the Charter ISA (Ch-ISA) Team meet?

Table 8.B1

Number of Meetings During School Year	Number Who Cited This	Percent
Once per month (8)	3	43
During redesignation window (2)	3	43
Four times per school year (4)	1	14

Table 8.B.1 shows the range in the number of times that the Ch-ISA Teams met from twice a year to monthly. One ELA Administrator related that they meet four times per year. Three respondents clarified that the number of meetings they reported represented the number of times that they formally met. Further, they noted that there are numerous Ch-ISA related meetings that take place more informally during the school year. One of those three respondents stated that during the start of the school year, they'll meet as often as twice a month.

Question B2--Describe a typical Ch-ISA meeting?

Table 8.B2

Ch-ISA Meeting Activities	Number Who Cited This	Percent
Meet in person or by phone (share a screen)	5	71
Discuss body of evidence (student files)	5	71
Review the Ch-ISA Newsletter for updates	1	14
Consider parent requests for waivers	1	14
Review student scores and placement (Exps. Express Placement, WAPT)	2	29
Complete outstanding forms	4	57

The frequency of activities taking place at Ch-ISA meetings ranged from teams meeting in person or by phone and discussing bodies of evidence (71%), to reviewing the Newsletter developed specifically for Ch-ISA Teams (14%), and considering parent requests for waivers from program services (14%). Reviewing student scores and completing required forms were listed by two respondents each (29%). Every ELA

Administrator interviewed listed at least two activities that take place during their school's Ch-ISA Team meeting. Additionally, we observed one formal Ch-ISA Team meeting at one school. The files of four specific students were reviewed and after each discussion, consensus was reached on one or more goals for each student. The range of issues discussed for the students included the need for language supports, attendance issues, writing scores, and a missing ACCESS score. This Ch-ISA Team meeting was similar to ISA Team meetings we've observed previously.

Question B3--Describe the body of evidence the Ch-ISA Team typically reviews for each of the following decisions in the "life cycle" of an EL.

a. Identification and registration of a student as an EL

Table 8.B3.a.

Identification and Registration Procedures	Number Who Cited This	Percent
Home visits made prior to registration	2	29
Home Language Questionnaire completed	3	43
WAPT testing is done	4	57
Have video parents can watch	2	29
Use DPS core packet for registration	1	14
Front office staff play critical role	3	43
Bilingual information is available	1	14
Emphasize strong presence at registration	1	14

There are numerous similarities between ISA and Ch-ISA Teams that are worth noting. Four ELA Administrators or 57% of them made a reference to WAPT testing that usually takes place after a student is registered. Only 14% of Administrators made a direct reference to using the core packet that the ELA Program developed or having registration materials available in languages other than English during this part of the life cycle of a student. Three respondents (43%) cited both the use of a Home Language Questionnaire and the critical role that front office staff play in identifying and registering students. On issues related to parents, two of the seven Administrators (29%) pointed out that home visits are made by charter school staff before registration takes place, and a video that parents can watch is made available during the day that registration takes place. Finally, one Administrator (14%) made the point that from Ch-ISA Team training that she received during the summer, she recognized the need to have a strong presence by teachers, secretarial staff, and teachers at registration.

b. Placement in ELA services (include information on parent waiver requests).

Table 8.B3.b

Factors That Determine Placement	Number Who Cited This	Percent
Home Language Questionnaire	5	71
WAPT	4	57
Ch-ISA Team plays a central role	5	71
Explain program services to parents	2	29
Review test data (MAPS), writing samples, and reading scores, WIDA rubrics	4	57
Complete a Parent Permission Form (PPF)	1	14

Five of the seven Administrators we interviewed (71%), pointed to the essential role that the Ch-ISA Team plays in placing students in ELA services. The same number of respondents made a reference to the Home Language Questionnaire which parents complete as a major factor in the placement of students. Over half (57%) of the administrators cited the WAPT and review of test data to include WIDA rubrics, MAPS, and writing and reading scores as factors that determine placement. Only 29% of the seven Administrators explicitly referenced the explanation of program services to parents as a factor in placing students. Last, only one Administrator cited the completion of the PPF as a student placement factor.

c. Redesignation

Table 8.B3.c.

Factors That Contribute to Decisions	Number Who Cited This	Percent
ACCESS scores	6	86
STAR scores	4	57
iStation scores	3	43
Report Cards	3	43
STEP test data	1	14
Writing samples	5	71

Similar to ISA Teams in ELA Program schools, ELA Charter Network Partner Tanis Humes provides charter schools with a roster of students eligible for redesignation. The seven Administrators identified six factors that contribute to Ch-ISA Team decisions regarding redesignation. Six of the seven respondents identified scores on the ACCESS test as the major factor in their decision-making. Five Administrators identified student writing samples as a key factor in decisions that the team makes. One Administrator referenced STEP test data (Strategic Teaching and Evaluation of Progress) as part of the Body of Evidence at her school. Report cards and iStation scores were identified by an equal number of Administrators (43%) and four of the seven persons (57%) we interviewed cited STAR scores as part of their school's Body of Evidence.

d. Monitoring of student progress after redesignation.

Table 8.B3.d.

Monitoring of Student Progress Factors	Number Who Cited This	Percent
Monitor for two years	7	100
Monthly student data review	2	29
PARCC grades	1	14
MAPs (Measures of Academic Progress) scores	1	14
STAR scores	3	43
Confer with parents	3	43

When asked what factors administrators take into account when monitoring the progress of students who have been redesignated, all seven replied that their school monitors students for two years. Only one (14%) of those Administrators we interviewed cited PARCC scores and MAPs scores as factors that contribute to their monitoring efforts. Three administrators (43%) identified STAR scores and conferring with parents as monitoring factors. Finally, two Administrators (29%), in discussing the monitoring that takes place at their school, stated that Ch-ISA Teams and others engage in a review of student data on a monthly basis as part of their ongoing monitoring efforts.

Question 4--How has the automated system used to compile CH-ISA data for students been working for you? Do you have any suggestions for the district on how to improve it?

Table 8.4

Satisfaction With New Automated System	Number Who Cited This	Percent
This year is much better	7	100
Strong support from ELA Partner	4	57
Monday morning email helps	2	29

Table 8.4 shows that all seven Administrators expressed satisfaction with the new automated system implemented by DPS, noting that the system "is much better this year" than during the first year of implementation. The ELA Network Partners responsible for oversight to ISA Teams and CH-ISA Teams send to each program and charter school, respectively, an email every Monday morning that informs the teams of updates, deadlines, and other relevant information. Two of the Administrators (29%) noted that the Monday emails are helpful. Four of the seven Administrators said they receive strong support from the ELA Network Partner, Tanis Humes.

Question 5--In redesignation decisions, how does your CH-ISA Team weigh, or reconcile, conflicting data in cases where some data indicate a redesignation should be recommended yet other data indicate there should not be a redesignation?

Table 8.5

How Team Weighs/Reconciles Conflicting Data for Redesignation	Number Who Cited This	Percent
Often hinges on writing	4	57
Conversations with parents	3	43
Frequent grade level team meetings	2	29
Review student grades	3	43
Not in a rush to redesignate	4	57
Seek opinion of ELA Partner	2	29

Four of the seven administrators (57%), identified writing scores and samples as a key factor when they weigh conflicting data for redesignation, mirroring the emphasis on writing as an important factor in redesignation that was also identified in our interviews with and observations of ISA Teams in non-charter schools. Additionally, four Administrators also noted that their school is not in a rush to redesignate students. Frequent grade level meetings and consultation with the ELA Network Partner were cited by two Administrators (29%) as factors the CH-ISA Team utilizes to weigh conflicting data. Three of the seven Administrators (43%) stated that having conversations with parents and review of student grades were factors that their CH-ISA Team considers when weighing or reconciling conflicting student data.

Three unsolicited reactions by charter school Administrators are worth noting concerning this issue of weighing conflicting data at the time that redesignation decisions are made. One Administrator mentioned that, “our central messaging is to dig deeper to show as much student proficiency as possible." A second Administrator noted that when it comes time to redesignate an English learner, "we err on the side of caution so that students can keep receiving services." Similarly, a third Administrator commented that, "we want to provide as many services for students as long as we can."

When creating the items in Section I.C of our Chapter 8 spot-audit checklist, we assumed that a scheduling or "service percentage" report would be available for the charter schools we visited. However, we found that this type of report is not generated for charter schools as it is for non-charter schools. The reason that this report is not available for charter schools is that in developing the district system, a teacher is "tagged" as ELA-T/E/S in the Human Resources Information System and then connected to a student's schedule in Infinite Campus for the service percentage. Charter schools do their own hiring and each has their own Human Resource Information Systems, so DPS cannot create a similar report. Charters do use IC so the district is able to monitor ELD scheduling.

Since a service percentage report was not available for the charters, we instead recorded in this section of our spot-audit checklist the number of students at each PPF designation (reported in Table 8.7), the frequency and duration of the ELD instruction provided to ELs at the school, and the percent of EL students enrolled in ELD. Those data are summarized in Table 8.6.

Table 8.6

Charter School	Duration & Frequency of ELD	ELs enrolled in ELD
STRIVE Ruby Hill	45 mins/day	100%
STRIVE Prep Federal	50 mins/day	All ELs but PPF3 students

Highline Northeast	Not recorded	100%
Rise Up	45 mins/day	100%
DSST College View Middle School	50 mins/day	Not recorded
GALS	Not recorded	All ELs but two in special education who are enrolled in special education language arts
DLS	45 mins/day	100%

The table shows that three of the seven charters reported providing 45 minutes of ELD per day, two reported providing 50 minutes of ELD per day, and no ELD duration was recorded for two of the charters (Highline Northeast and GALS – we failed to record the duration for those two schools. A follow-up with DPS verified that we observed ELD instruction at GALS, that Highline Northeast uses EL Achieve for ELD just as non-charters do, and that the monitoring rubric used for charters requires a minimum of 45 minutes of ELD daily). The table also shows that all ELs were scheduled into an ELD block in four schools, all but PPF3 students were scheduled into ELD at one school (Note: PPF3 students are not enrolled in ELD in charters or non-charters), all but two special education students were scheduled into ELD at one school, and that for one school the percent of EL placement in ELD was not recorded in our data sheets.

Section II.A of the Chapter 8 checklist sought information regarding the membership of the Ch-ISA Teams, their qualifications, most recent ELA training, and the type of documentation kept for Ch-ISA meetings.

Ch-ISA Team membership at all six schools included the Principal and at least two teachers. One school included a third teacher and one included the Vice Principal. Five of the six Principals indicated they had completed ELA or LED training or had a Masters degree. One Principal and a Vice Principal said their training was "not completed." The District later clarified for us that Ch-ISA Team members cannot access the system without completing the Moodle. The context for the Principal who indicated his training was not completed was that he was stepping into a role for someone who had just gone on maternity leave and he had not done the Moodle training yet. Of the 13 teachers who were members of Ch-ISA Teams, nine had completed the ELA or LED training or had a Masters degree, and four indicated their training was in progress. Five of the six Principals and the one Vice Principal had most recently participated in ELA training in July, August, or September preceding or during the current school year; one Principal had completed the training "last year." Eleven of the 13 teachers had completed their most recent training in July, August or September, and one teacher had completed the training in December. The most recent training date was not recorded for the thirteenth teacher.

One of the six schools reported keeping formal documentation of Ch-ISA meetings (meeting agendas) while the other five schools do not keep formal documentation such as meeting agendas or meeting minutes. At four of the six schools, staff referred to the IC as the source of the information they used during Ch-ISA meetings. At one school, the Assistant Principal keeps notes, at one school student folders are kept for each student and used along with the IC, and at one school staff noted that some hard copies of assessments are maintained.

Analysis of Individual Student Records

Ch-ISA Teams follow the same procedures for EL student identification, redesignation, and monitoring that ISA Teams follow, and the CD specifies in Chapters 2 and 4 the responsibilities of the ISA Team and that ISA decisions be based on multiple sources of assessment information. As part of the examination of Ch-ISA Teams, 61 individual student records were systematically sampled from the seven charter schools to document types of Ch-ISA decisions made and the evidence cited by the teams in making those decisions. Ten records were sampled from each of STRIVE Ruby Hill, Highline, DSST, and DLS; eight records each were sampled from both STRIVE Prep Federal and GALS; and five were sampled from Rise Up. Sample sizes differed among the schools due to differing populations of ELs at each school whose status had been assessed by the Ch-ISA Team and we did not record the total number of students at each school from which we systematically sampled.

Table 8.7 summarizes the decisions made by the Ch-ISA Teams and the evidence considered by the teams in making those decisions. Of the 61 decisions represented in the table, 46% (28/61) dealt with redesignation, 34% (21/61) with identification, 18% (11/21) with PPF3 monitoring, and 2% (1/61) with classification of the student as a Newcomer. The table also summarizes the outcomes of the decisions made by the Ch-ISA Teams: 57% of students whose redesignation status was considered by the teams were redesignated; 95% whose EL identification was considered were identified as ELs; 45% of the PPF3 students who the teams were monitoring were judged to be making progress; and the one student considered for Newcomer identification was classified as a Newcomer.

Table 8.7 shows that, regarding redesignation decisions, ACCESS scores (used in 96% of redesignation decisions) and grades (used in 93% of redesignation decisions) were used the most frequently as the basis for the decision. Identification decisions were made based most often on WIDA and STAR performance (both used in 100% of identification decisions). In monitoring the performance of PPF3 students, grades were most often used (in 100% of PPF3 monitoring decisions) followed by CMAS scores (45% of PPF3 monitoring decisions). The student assessed for Newcomer status was assessed using the district's Newcomer Questionnaire. Our review of the student records further showed that 98% (60/61) of the 61 decisions were based on two or more pieces of evidence, with the only exception being the Newcomer decision. While we documented the frequency with which different assessments were cited for these decisions, we did not record the relative weight given to each assessment in those decisions.

Table 8.7

Type of Decision	Number	% of Total Decisions	Outcome	Evidence Cited
Redesignation	28	46%	Redesignate: Yes 57% No 43%	ACCESS 96% Grades 93% CMAS 21% MAPS 14% WIDA 14% STAR Rdg. 11% Transcpts 7% iStation 4% DRA 4% PARCC 4% TCAP 4%
Identification	21	34%	Identify as EL: Yes 95% No 5%	WIDA 100% WAPT 100% STAR 29% STEP 14% iReady 10% DRA 10%
PPF3 Monitoring	11	18%	Progress: Yes 45% No 55%	Grades 100% CMAS 45% MAPS 18% Par. inter. 18%

				Alt. Assess. 9% STEP 9% "BOE" 9% STAR Rdg. 9%
Newcomer (NC)	1	2%	Newcomer: Yes 0% No 100%	NC Ques. 100%
TOTAL	61			

Charter Renewal and ELA Quality Assurance

During our meeting with District administrators focusing on charter renewal (CD Chapter 8.C) and monitoring (CD Chapter 8.A), the District shared a document that overviewed the processes used. Following is a summary of the information shared in that document.

Charter Renewal. According to the District's overview, charter renewal recommendations are made based on a Body of Evidence of the school's academic and organizational performance, with academic performance being a primary consideration. Data for the Body of Evidence are collected during the fall of the final year of the charter term, led by a Portfolio Management Team composed of DPS staff and outside experts. Evidence collection includes a site visit to the school during which stakeholder interviews and classroom observations are conducted. Based on the Body of Evidence, the team makes a renewal recommendation along a continuum ranging from "non-renewal" at one end of the continuum to renewal for 1 to 2 years with conditions, 2 to 3 years with conditions, or a five-year renewal at the other end of the continuum.

ELA Quality Assurance. In discussing the District's monitoring of ELA services at charter schools, DPS provided us with an overview of their approach. DPS monitoring of ELA services for charters is grounded in the District's School Quality Framework and a Charter ELA Quality Assurance process that has four components: 1. A call for new schools that has as its goal ensuring that all approved new schools have ELA plans that meet standards; 2. New school monitoring that has as its goal ensuring that new schools are opening with ELA programs that meet standards; 3. Tiered support that has as its goal ensuring that all schools are meeting expectations for ELL student performance; and 4. Renewal that has as its goal ensuring that charter schools are meeting performance and program standards for serving ELL students. Monitoring of charter school services for ELLs thus is built in at each step in this process.

As the basis for monitoring of ELA services for ELLS in charter schools, DPS uses a five-part rubric, with each of these five parts further broken down into CD-based requirements for providing services to ELL students and their families: 1. Identification Process and Parent Involvement; 2. Assessment and Placement; 3. Program Design and Curriculum; 4. Professional Development and Evaluation; and 5. Exiting/Redesignation and Monitoring Criteria. Reviews conducted of each charter school are documented with a review form that is kept on file by the District. We had not planned in time to conduct a spot audit of those review forms during our November 2016 visit, but that documentation would be a useful source of information in any future examination of CD Chapter 8 implementation as a follow-up to what we report here.

Chapter 6: Parental Oversight

Method

This chapter of the CD contains seven major requirements and five affiliated sub-requirements related to the District-wide Advisory Committee or DAC. The Chapter 6 Spot Audit Checklist (Appendix 7) that we created to gather evidence for Chapter 6 consists of a first section of interview questions about the PAC and DAC and based primarily on CD Chapter 6.I.A and B (PAC requirement and purpose), and then a second section used to document what occurred at PAC meetings we observed (CD Chapter 6.I.B). The IM attended a DAC meeting during 2106 to observe what occurred and then met with the DAC advisory Council to gather information pertinent to the implementation of CD Chapter 6.II and 6.III and we also reviewed DAC-related documents.

Our discussion summary and discussion of the data we collected regarding CD Chapter 6 is divided into two distinct parts; one that concentrates on Parent Advisory Committees or PACs at ELA Program schools and the DAC, which provides the opportunity for a parent representative from each Program school to participate in this district-wide endeavor.

Evidence gathered in support of Chapter 6 occurred during the week of February 13-18, 2017 across seven schools. Those schools were:

- West Leadership Academy
- Barnum Elementary
- South High School
- Cole Arts and Sciences Middle School
- Eagleton Elementary
- Swansea Elementary

- Ellis Elementary

We selected the seven schools above following the process we've continually used and that we've outlined throughout this report. Prior to selecting these seven schools, the IM reviewed a running spreadsheet he maintains that shows all of the schools visited since 2013. I then reviewed the ELA Program Report from January 2017 and selected schools that represented multiple ELA designations including TNLI, TNLI and ESL Resource, and ELA-E with a Spanish Qualified Resource Teacher. I included a middle (West Leadership Academy) and high school (South High School) along with five elementary schools. The schools were part of multiple networks across DPS and had an EL student enrollment that ranged from 152 to 387. I conferred with Dr. Nelson who reviewed the list of schools and agreed that they were a representative sample of schools in the district. We submitted our list to the ELA Department and requested that they coordinate our February site visits.

At each of the seven schools, we not only met with the principal, staff, community liaison (if the school had one) but most importantly, with the ELA PAC members. Each PAC was different and unique. A universal theme that we encountered was the expressed need by school leaders and PAC members for the need to get more parents involved. Some PAC meetings were quite organized and parents followed an agenda closely. In other meetings, the focus was more on specific training that had been identified previously by parents as a theme for that meeting. At Swansea Elementary for example, there was a painful conversation that took place among parents about the implications of the massive construction occurring along the I-70 corridor that was already creating major gentrification challenges for Spanish speaking families of that community. One of the leaders of the PAC and the Swansea community announced at this meeting that he and his family would soon be leaving and relocating because rent had doubled on his family's home. At Ellis Elementary, 10 Muslim parents sent word through the principal that they would like to meet with me after the PAC meeting. It was one of the most personally poignant and painful conversations I have had during my years in this role. Parents expressed their deep concerns to me about the safety of their children in light of the political realities they faced post-Presidential election. As one mother shared with me, "we feel that our kids are safe here at Ellis but not outside of here and we live in fear." Another mother with tears in her eyes told me, "I want to explain to my kids that they will be safe but I can't." To the credit of Superintendent Boasberg and the Board of Education, DPS has taken a leadership role among school districts nationwide in assuring the safety of all students. Ironically, the night before my meeting at Ellis Elementary, the district approved an action known as the Safe and Welcoming School Resolution which states the following:

… the district shall do everything in its lawful power to protect our students' confidential information and ensure that our students' learning environments are not disrupted by immigration enforcement actions …

One concern that I have expressed to DPS in previous reports is that not every program school yet has an ELA PAC as the CD calls for. In previous reports, I have even suggested that the ELA Department should consider creating an initiative in which ELA Network Partners play a more active role with the schools in their respective networks to meet this very basic yet fundamental CD requirement. During the October 2017 visit to the district, we along with CHE member Martha Urioste met with Bridget Galati of the ELA Dept. Ms. Galati is leading an initiative to work through the Network Partners to assure that every program school in DPS has an ELA PAC formed and operational by the current

(2017/2018) school year. She has made major progress in assisting the district to meet this requirement.

With regard to the DAC, from the data we collected it appears that this portion of the Chapter 6 requirement is being fully implemented. The ELA Department in collaboration with the Family and Community Engagement (FACE) Program is implementing the DAC activities in response to the CD. They have alternating monthly meetings where the Superintendents Parent Forum (SPF) leads the DAC one month and the Family Leadership Institute (FLI) leads the DAC the next month. They alternate like this the entire year. During September of each school year, the SPF hosts a two-day DAC Kickoff at two different locations to better meet parents' transportation needs. The Kickoff addresses numerous CD requirements as part of its agenda. This shift to alternating monthly meetings was actually requested by parents over two years ago and therefore, this is how the DAC structure is now implemented. It is during these two Kickoffs that issues such as ELA Program types, parent rights and responsibilities, the CD and other key issues are introduced and discussed using multiple meeting formats. In addition, other topics and issues of interest to parent participants are presented both at the SPF and FLI monthly sessions. Interpreters in multiple languages are always present.

The DAC sessions are hosted at two different physical locations to give parents as much of an opportunity to participate as possible. In the past, representatives from the GT and Student Services Programs have presented at the DAC. I attended one DAC meeting in 2016 and was scheduled to meet with the DAC Advisory Board for 30 minutes. Our half hour meeting turned into a two-hour conversation where we were able to touch on numerous issues of interest and concern for the Board. As an example, one issue that we discussed was the importance of a school's community liaison. Some program schools have liaisons and some do not since some schools prioritize that position in their school-based budget and others don't. The position of the DAC Board was that this is a position that should be mandated at every program school. Issues such as this were at the heart of our conversation and I was impressed with the skills, commitment, and professionalism of the DAC Board. As intended, they play an active leadership role in the DAC.

Finally, the most fundamental issue for CHE members regarding parental oversight is explicitly stated in requirement A of Chapter 6. Each Program school has a PAC, chosen by parents of the students receiving services at the school. The purpose of each PAC is to provide information regarding the ELA Program, increase communication between ELL parents and the District, review implementation of the Program, and listen to the concerns of parents. Having a PAC at every single Program school that is active and addressing these requirements while being supported by the DAC will become the fundamental requirement by which Chapter 6 is fully implemented. The DPS is close to meeting this requirement.

Results and Discussion

I. Parent Advisory Committees (PACS)

At all seven schools we visited, we met with members of the PAC and others. Most importantly, we actually observed PAC meetings taking place at all seven schools. The responses to the questions which follow were provided by a combination of persons including parents, the school principal or assistant principal and community liaison.

Question 1--When was the PAC first started?

Table 6.1

Date the PAC was started	Number of school PACs with similar responses	Percent
2015	1	14
2014	1	14
2012	2	29
2011	2	29
2007	1	14

Five of the PACS (72%) were started before 2014 while two of the PACs (28%) were started more recently (2014-2015). One PAC member commented that their PAC started three years ago but family involvement has increased since then. Another PAC member mentioned that their PAC started recently as a result of the efforts of a new principal. A parent from another school said their PAC got going as a result of parent input on a school innovation plan.

Question 2--Is the PAC a stand-alone committee or subcommittee?

Table 6.2

Type of committee	Number of school PACs with similar responses	Percent
Stand-alone	6	86
Sub-committee	1	14

Six of the seven PACS (86%) are stand-alone committees and one PAC (14%) is a sub-committee.

Question 3--How are members of the PAC chosen?

Table 6.3

Method of selection	Number of school PACs with similar responses	Percent
Recruited through various outreach efforts from the school to all families of ELLs.	7	100
Self-selection	7	100
More involvement of parents of ELA students	2	28

All seven PACs (100%) reported that they conducted various multilingual outreach efforts including meetings, morning coffee sessions, the school website, newsletters, and Facebook messages to recruit PAC members. All PAC members self-select and serve voluntarily. Two PACs (28%) stated that the majority of their PAC members are parents of students who are in ELA classes.

Question 4--How often does the PAC meet?

Table 6.4

Schedule of PAC meetings	Number of school PACs with similar responses	Percent
Once a month	2	29
Twice a month	2	29
Four times a year	3	42

Of the seven PACs that we interviewed and observed, two PACs (29%) met once a month, two PACs (29%) met twice a month on every other Friday morning, and three PACs (42%) met four times per year. In addition to their regularly scheduled meetings, PACs may also meet periodically for other reasons such as to consult with lawyers or to observe classes. Based on this information, the minimum number of meetings per year is four.

Question 5--How are PAC meetings documented?

Table 6.5

Type of documentation	Number of PACs with similar responses	Percent
Sign-in sheets	7	100
Meeting Agendas	6	86
Meeting schedule for year or semester	4	57
Meeting minutes	2	29
Audio recording	0	0
No written documentation	1 (previously)	14
Other: survey of parents	1	14
Other: meeting notes	1	14

All seven of the school PACs reported that they documented their PAC meetings in various ways: 100% used sign-in sheets; six (86%) used meeting agendas; four (57%) produced a monthly or yearly meeting schedule; two (29%) took meeting minutes and one (14%) took meeting notes. Members of one of the PACs reported that in previous years they had no written documentation of their meetings but currently used sign-in sheets and agendas. One PAC (14%) also surveyed parents as a form of meeting documentation.

The forms of PAC meeting documentation that we actually observed while attending the PAC meetings were sign-in sheets (in three PACs), agendas (in three PACs), meeting schedules (in two PACs) and meeting minutes (in one PAC).

Question 6--What happens in a typical PAC meeting?

Table 6.6

Type of PAC Activity	Number of PACs that engage in this activity	Percent
Welcome/Introductions	7	100
Agenda connected to ELA program	4	57
ELA support and training	3	43
DAC meeting report out	3	43
Presentations	4	57
Coffee with the Principal	3	43
Testing/assessment updates	3	43
Calendar of upcoming events e.g. teacher/parent conferences	5	71
Communication/outreach via newsletters, face book, apps, phone calls, parent portal to inform and recruit more parents	4	57
Discussion on topics e.g. refugees, immigration, social/emotional learning, student/parent rights, biliteracy, bullying, homework, discipline, teachers, dress code, safety, after-school programs, learning walks, redesignation, EL program models	7	100
Curricular/social resources	3	43
Home visits (parents to parents)	3	43

Table 6.6 shows that during our spot-audit visits to seven school PAC meetings, the most typical activities mentioned were: welcome/introductions (100%), agenda overview (57%), presentations by ELA support staff or district personnel (57%), overview of the upcoming events (71%), communication and outreach among parents (57%), and discussions concerning a variety of parental concerns (100%). Also, 43% of the seven PACS discussed EL support and training, testing and assessment updates, curricular and social resources, the DAC meeting, coffee with the principal event, and/or home visits (parents to parents). The comments regarding the Coffee with the Principal morning meetings were

very positive since such valuable information regarding immigration, parenting classes, English classes and other relevant topics is shared.

Also of note is that in one PAC meeting, the group of attendees was split into two sections – one for Spanish speakers only and the other for speakers of all languages other than Spanish. In addition, at one of the high school PACs we visited we learned that the PAC parent leaders conduct over 100 home visits to families with EL students each year in early April. All the PACs have an open-door policy that encourages parents to come to the PAC leaders anytime with needs.

Several recommendations from the parents to the schools were: 1) students in the ELD block need more English; 2) safety for Muslim students should be addressed; and 3) the schools need to always work on getting to know the families better.

Question 7--What type of assistance has the school and district provided in organizing and running the school PACs?

Table 6.7

Types of school/district assistance provided to PACs	Number of PACs that reported they receive this type of assistance	Percent
Community liaison	2	29
Office of Family and Community Engagement (FACE) helps with home visits and community liaison training	2	29
PowerPoints for presentations	1	14
Translators and headsets from the District	7	100
District level ELA Department rep	2	29
Trainings from school/district staff	2	29

Community organizing with Together CO	1	14
ELA Network Partners	7	100
Parents as Partners (food, money, childcare)	7	100
Food Bank boxes delivered every Friday from Intercity Parish	1	14

Ten categories or types of assistance from the school, district, and/or external organizations were identified by PAC members we interviewed. All seven of the school PACs (100%) reported that the District provides translators and headsets if requested; support from the ELA Network Partners; and food, money, and childcare from Parenting Partners. In each of the following categories, two PACs (29%) mentioned they receive additional support from: 1) the district community liaison; 2) the Office of Family and Community Engagement (FACE) in conducting home visits and in training the community liaison; 3) the District ELA Partner representative who attends PAC meetings; or 4*)* the school/district principal and staff who conduct trainings at PAC meetings. Four other forms of assistance were each mentioned by only one PAC: PowerPoint presentations from the ELA Department; help with home visits from the district; community organizing with Together Colorado; and food bank deliveries weekly from the Intercity Parish.

Several PAC members noted that the representative from the District ELA department is “super helpful.” Also the food, money, and childcare provided by Parenting Partners “is really popular with parents.” We often heard positive remarks about the helpfulness of the Principal. One parent remarked that she “feels like the school is home” and that “her child is safe here.”

Question 8--Who represents the school on the District Advisory Committee (DAC)?

Table 6.8

Representative(s) on DAC	Number of PACs with a similar response	Percent
One or more PAC parents	6	86
Principal and/or ELA staff member	2	29
Little or no representation from the PAC	1	4

Six of the seven school PACs (86%) indicated that one or more parents self-select from each PAC to attend the DAC meetings. Two PACs (29%) reported that the school principal and an ELA teacher also attend. One PAC admitted they had little or no representation at the DAC meeting.

Several PAC members mentioned that the parents/staff who attend the DAC meetings learn a lot and report back to the whole PAC to share what they learned. Another PAC member said that "*DAC es nuestra voz*" or DAC is our voice. One PAC member also said that in a recent DAC meeting, some of the parents were upset because they felt their concerns were not being heard.

Question 9--What could the school or district do to provide additional support?

Table 6.9

Types of additional support needed	Number of PACs with similar response	Percent
Scope and sequence of curriculum from ELA Dept.	1	14
A resource bank of ELA information for parents	2	29
More funding for travel and family liaisons	1	14
Help with parent engagement	1	14

Hire the Director of Culture	1	14
Childcare and food	1	14
No suggestions	1	14

Table 6.9 provides a range of suggestions made by PAC members concerning their need of additional types of support. Two PACs (29%) requested a resource bank of ELA information be made available to parents. Along the same lines, one PAC (14%) asked that parents be provided with a scope and sequence of the ELA curriculum. We were also told in one PAC meeting that more funding was needed for parents' travel to meetings. In relation to this expressed need, a parent commented that it takes 45 minutes and three bus transfers for her to get to a PAC meeting.

In addition, one PAC (14%) said the district should help them recruit more PAC parents and another PAC asked for more support for childcare and food at the meetings. Also one PAC (14%) commented on the need to hire a community liaison at each school and a District Director of Culture soon. Only one PAC (14%) had no suggestions.

Question 10a--Does the PAC provide information to parents and others outside the PAC meetings?

All seven PACS (100%) stated that they or the school provided information to parents and others. But only one of the PACs listed on the form what types of information they shared. (See Table 6.10.A below)

10b--If so, what type of information is shared?

Table 6.10.A

Type of information provided	Number of PACS with a similar response	Percent

Services and assistance available to parents	1	14
Upcoming meetings	1	14
Meeting minutes (translated)	1	14
Helpful organizations line Know Your Rights	1	14

The only conclusion we can make is that since only one PAC responded to this question, additional information on specific types of information shared requires further investigation.

10B--How is PAC information provided to parents and others?

Table 6.10.B

How PAC information is provided	Number of PACS with a similar response	Percent
I-Zone	1	14
Native language translators	1	14
School/district website	6	86
Facebook	5	71
Propel Media app	2	29
Newsletter	3	43
Automatic robo calls	4	58
Flyers	2	29
Parent-parent communication	1	14

Nine different specific forms of communication were identified by PAC members who were interviewed. Six of the PACs (86%) cited the school and district website as the primary form of giving and receiving information. Facebook was mentioned by five of the PACs (71%) and robo calls by four of the PACs (58%). Other avenues of communication mentioned included newsletters (43%), flyers (29%), apps (29%), I-Zone (14%), native language translators (14%), and parent-to-parent conversations (14%). In summary, one parent noted: “The school is great at sending information to all parents in multiple languages.”

Open-Ended Questions from PAC Meeting Observations:

Question 11--How many parents are in attendance?

Table 6.11

Number of parents observed attending the meeting	Number of PAC meetings with the same number of parent attendees	Percent
5	1	14
6	2	43
12	2	29
20	1	14
40	1	14

As Table 6.11 shows, the number of parent attendees at the seven PAC meetings we observed varied from school to school. Three PACs had either five or six parents in attendance, two had twelve parents attending, and two PACs had a larger attendance of 20 or 40 parents. The PAC with 20 parents attending was split into two groups – one group with Spanish speaking parents and one group with speakers of languages other than Spanish. Both PAC groups had translators and headsets.

In the meetings with fewer parents, the PAC members cited possible reasons for the lack of participation. Some attributed the low turn-out to conflicts with work and family obligations. Another suggested that "parents feel that education is the job of the teacher and school."

Question 12A--Are there others in attendance?

All seven schools (100%) had participants other than the parents in attendance.

Question 12B: If so, how many and what are their roles?

Table 6.12.B

Role or position of other attendees observed at the meeting	Number of PAC meetings with each type of other person attending	Percent
Principal(s)	4	57
Teacher(s)	4	57
Network Partners	2	29
DPS Attorney	2	29
ELA dept. rep	3	43

Of the seven PAC meetings we observed, one or more Principals and teachers were in attendance in four (57%) of them. In three of the meetings we observed, the ELA rep was in attendance. And in two of the meetings (29%), a network Partner attended two meetings and a DPS attorney also attended. At the two schools where the attorney was present, I checked with the PAC to see if they approved and they did.

Question 13--What observed activities occurred during the PAC meetings?

Table 6.13 shows that during our spot-audit visits to seven school PAC meetings, the activities we observed were: welcome/introductions (100%); presentations by ELA support staff or district personnel (57%); calendar of the upcoming events (71%); communication and outreach among parents (57%); and discussions and information sharing concerning a variety of parental concerns (100%). Also, 43% of the seven PACS discussed EL support and training, testing and assessment updates, curricular and social resources, the DAC meeting, and/or home visits (parents to parents).

Table 6.13

Type of Activities observed during PAC meetings	Number of PACs that engaged in this activity	Percent
Welcome/Introductions	7	100
DAC meeting report out	3	43
Presentations	4	57
Testing/assessment updates	3	43
Calendar of upcoming events e.g. teacher/parent conferences	5	71
Communication/outreach via newsletters, face book, apps, phone calls, parent portal to inform and recruit more parents	4	57
Discussion on one or more of the following topics: Lau V. Nichols, refuges, immigration, Denver 2020 Plan, social/emotional learning, student/parent rights, biliteracy, bullying, homework, discipline, teachers, dress code, safety, after-school programs, learning walks, redesignation, and/or EL program models	7	100
Curricular/social resources	3	43
Home visits (parents to parents)	3	43

6.II. District-wide Advisory Committee (DACs)

A. Question 1.--What is the status of the DAC?

During the 2016-2017 school year, the District modified the way in which the DAC is implemented. The ELA Department in collaboration with the district's Family and Community Engagement Office integrated the Superintendent Parent Forums (SPFs) and the Family Leadership Institutes (FLIs) into the DAC. The DAC meets monthly during the school year per the CD requirement. One month the focus is the SPF and the next month the focus is on FLI. During the 2016-17 school year, five SPFs and four FLIs were implemented by the district.

Question 2.--Has a parent representative from each Program school been identified?

In reviewing attendance data for the monthly DAC meetings, we were able to determine that most ELA Program schools send parent representatives. More specifically, our review of the DAC data showed that 14 schools did not have at least one parent attend a DAC meeting during the 2016-17 school year. Of those 14, six are Pathways schools and several others such as Steele Elementary and Denver Discovery School have low numbers of ELs. In an ongoing effort to address this CD requirement, the ELA Department has engaged in a comprehensive outreach effort aimed at every Program school in the district. Examples of how DAC meeting information is publicized and made available to parents includes:

- Emails to school-based Family Liaisons
- Emails to the Constant Contact List
- Posting on FACE Community Calendar
- Emails to parents/staff lists
- Posting on Parent Portal
- Robo-calls to parents

- Posting on FACE website, ELA webpage, DPS website and, Commons website
- Info is shared in Principal Weekly
- Send UP postal mailing to ELA families
- Personal phone calls from schools to ELA families
- EDUCA Radio interview segments
- EDUCA radio PSAs in Spanish and English
- Univision TV: Voces de Nuestra Comunidad

Other examples of evidence that we reviewed included; SPF and FLI parent sign-in sheets; PAC newsletters that advertised SPFs and FLIs and which were sent to all school PAC contacts; and ISA newsletters that advertised the SPFs and FLIs. These newsletters are sent to all ISA Team members.

B. Question 3--How often does the DAC meet?

The DAC meets monthly. We reviewed the monthly sign-in sheets and agendas to verify this.

Question 4--How many interpreters have typically been required at DAC meetings? For how many languages, typically?

We reviewed all of the requests made to the Multicultural Language and Outreach Services Translations Office during the 2016-2017 school year. For the FLIs, the documents that were most often translated were workbooks for parents. The three languages for which translations of materials were requested included Spanish, Vietnamese, and Arabic. For the SPFs, requests to the Multicultural Language and Outreach Services that we reviewed included translations for flyers announcing the forums and for In Person interpreters. Flyers were translated into the following 13 languages: Arabic, Amharic, Burmese, French, Karen, Kunama, Nepali, Russian, Somali, Spanish, Swahili, Vietnamese, and Tigrigna. Additionally, interpreters for each of those 13 languages were requested at the actual forums. The number of interpreters however, varied from meeting to meeting. As an example, at the Fall DAC Kickoff on September 27, 2016, two English and two Spanish interpreters were requested as well as one interpreter for each of the other 12 languages. For the second ELA DAC Kickoff on February 9, 2017, three English and Spanish interpreters were requested and one for each of the remaining 12 languages.

C. Question 5--Which of the following activities has the DAC been involved in?

- Review and Comment on ELA annual reports presented to the Board of Education. We learned that the ELA Department no longer reports to the Board on an annual basis. Instead, the ELA DAC Board reports to the DPS Board of Education annually.
- Review and comment on student assessment results made available for each school. The SPF which took place on September 27, 2016 devoted almost the entire forum to address student assessment issues. There was discussion at the forum about the Great Schools in Every Neighborhood goal of the Denver Plan 2020. Parents had an opportunity to participate in small group activities that introduced them to the School Performance Framework. They were able to assess the color representing the rating of their respective schools, gain information about the equity indicator, and talk in small groups and the large group about how ELA students were performing at their school based on the data provided them. In addition, there was a panel discussion at the forum that dealt with the topic of accountability and its effect on the trajectory of their school.
- Provide input regarding the District's efforts to increase parent involvement.

After every SPF and FLI, surveys are conducted which address five issues related to increasing parent involvement. Parents are asked to rate the way information was presented to them, whether it was useful for them as parents, whether they feel equipped to take this information back to their school and share it with others including PAC members, whether the event was easy to access, and their overall rating of the event. Our review of some of the evaluation scores gave the impression that parents are honest and critical. For example, at the September 27, 2016 SPF, 33 parents rated it as excellent, 21 as very good, 7 as good, and 9 gave the event a rating of fair. Parents were also asked for written and verbal comments, and although the commentary we reviewed touched on many issues, some parents were specific in providing suggestions for making sessions more effective.

- Discuss the structure and operation of school-based PACs.

  From the written evidence we reviewed, the operation of school-based PACs is a central theme of the start of the school year DAC Kickoff. At the September 6th and 7th Kickoff, parents were provided with an overview of ELA PACs including discussion about the need for reviewing their school's ELA Program and being able to express any concerns to the PAC. There was also discussion about the DAC and the importance of participating in this event. Parents were also provided with an overview of the CD including the history and struggle for civil rights in the DPS.

- Help parents understand ELA program services and benefits of those services.

  Our review of evidence suggests that three of the DAC meetings addressed this issue. The September DAC Kickoff introduced some of the ELA Program supports for ELLs with an emphasis on TNLI, ESL, and Dual Language Programs. Information was provided on dedicated and integrated ELD and a good deal of information was provided on the Seal of Biliteracy. Parents were also provided with information on Gifted and Talented Programs and there were staff at the Kickoff that parents could speak with to gain additional information. In the November 3, 2016 FLI, the focus of the training was on the importance and value of bilingualism and, secondly, on the Lifecycle of an English learner. Finally, we reviewed the presentation materials used during the January 19th, 2017 FLI. The focus of the entire training was on ELD. Parents were introduced to the ways their students learn a second language, why ELD blocks are necessary, and how parents can support and help their children at home.

- Provide the opportunity for parents to discuss concerns about the ELA Program.

In reviewing the various SPF and FLI agendas, we noticed that in every FLI session, there is a 30-40 minute allotment of time provided to reflect on the training, answer questions, and listen to concerns from parents. After every SPF, there is an evaluation conducted which included written comments. The following is a sample of comments offered by parents after DAC sessions:

1. "Communicate more about the Biliteracy Seal so our families know about it and how to apply."
2. "As part of the Seal of Biliteracy, we need more info on scholarships for fluent bilingual students."
3. "More information on graduation requirements and scholarships."
4. "Do teachers/leaders have skills and training to support English learners at an early age in ECE?"
5. "Newcomer information, and not just training, but make sure to implement it by

the office staff."

6. "GT: More information about how to qualify and to support. What does the test measure? How do I know if my child might qualify?"
   We should note that items 1, 2, and 6 above have been shared with the DPS Board. Based on this feedback, the ELA Department informed us that they have a Seal of Bilteracy resource table at every DAC meeting. Also, GT information is presented at the DAC Kickoffs in September.

- Other DAC activities.

  From our review of documentation provided for us, there were several other activities in which the DAC was involved. From previous DAC forums that the Independent Monitor has participated in, one theme that was present in many of the FLIs is Parent Leadership. At least three of the agendas and corresponding training materials provided for review show a focus on providing hands-on sessions for parents that are oriented toward helping them develop leadership skills in areas like developing stronger home and school partnerships, how to examine ELA Program services more critically, recognizing themselves as strong people with strong visions, etc. Other DAC activities included sessions within the SPF on college and career readiness, early literacy, and a presentation and discussion on the Denver Bond and Mill election. Finally, the DAC also convened a meeting with the DPS Muslim community so that the larger community of parents across DPS could gain awareness and understanding of some of the fears of parents and their reluctance to even participate in some DAC activities due to the political climate nationally.

D. Question 6--Has the DAC reported at least annually to the Board of Education on its activities in item 5?

We reviewed the End of the Year Report for the 2015-2016 school year which was presented to the DPS Board during their June 2016 Board Meeting. The presentation was done by the three ELA DAC Board members who represent the Math and Science Leadership Academy, Marrama Elementary, and Bruce Randolph High School. Although we were not present at the Board presentation, we did view it on a video that was made available. Most recently, the DAC Board also presented their Annual Report to the DPS Board during the May 18, 2017 Board of Education meeting. We reviewed the hard copy of the ELA DAC presentation and watched the video of the actual presentation done by Jorge Robles and two DAC Board members who presented to the Board in Spanish.

6.**III. Parent Training**

A. Question 7--Has the DAC provided an annual training program for parents regarding their rights and responsibilities in connection with the ELA Program?

The annual training program for parents was provided in two forums. The first was at the ELA DAC Kickoff on September 6th (same training repeated on Sept. 7, 2016) and focused specifically on ELA parental rights and responsibilities. There was an orientation provided on the CD and how, from this legal action, the PACs and DAC were born. There was also training provided on the role of the DAC Board as the leadership body of the DAC. In addition, during the FLI on January 19, 2017, there was a session led by ELA Program staff that provided a series of mini-sessions on ELA program services including TNLI, ELD, Newcomer, dual language, and ACCESS testing.

SUMMARY AND RECOMMENDATIONS

Two years ago, the IM decided to change the approach to collecting and reporting data regarding the Denver Public School's efforts toward meeting the requirements of the Consent Decree. With the assistance of colleague Dr. Chris Nelson, we decided to use a mixed methods research approach utilizing spot audits based on each of five chapters of the CD. The methodology was straightforward and supported by social science program evaluation and research practice. The goal was to collect evidence from either a representative sample of, or all of, the requirements outlined in each CD chapter, analyze these data and report our findings to the Court. This Sixth Report provides the results of these efforts.

Beginning in early 2016 and extending into 2017, spot audits were conducted in 41 representative Program schools across DPS based on five chapters of the CD. Those CD chapters, in the order we collected data on them, are numbers Seven, Three, Two, Eight, and Six. Utilizing our own self-created spot-audit checklists that correspond to a sample of CD requirements for each of the five chapters, we collected a substantial amount of information over 15 months. This sixth report presents the results of the evidence we've gathered consistent with the research based methodology that we've followed. Our evidence gathering has been informative and the spot audits we've conducted allow us to report our findings in both qualitative and quantitative ways. We've interviewed school leaders, teachers, ELA Program staff and parents of English language learners served by the Program. We've shared some of our preliminary findings with the parties during the most recent meeting in Denver during April of 2017.

In general, the results of our spot audits over five of ten CD chapters are favorable toward the Denver Public Schools. The district's efforts have not gone unnoticed. During the April 2017 meeting of the parties in Denver, both the DOJ and CHE representatives commented publicly that the district was working hard at implementing the requirements of the CD and that the results of those efforts were noticeable. This is not to imply that there isn't still work to be done and DPS has admitted as much.

We've formed some additional general impressions about the district's efforts in meeting CD requirements based on our spot audits of five chapters. First, support for the ELA Program has been voiced on numerous occasions by Superintendent Tom Boasberg. Assistant Superintendent Dr. Susana Cordova continues to be a strong advocate and champion for the Program and she now oversees the ELA Department within the district's larger management structure. Second, the ELA Network Partners continue to be one of the most integral parts of the implementation of the ELA Program district-wide. They truly represent a network of experts within DPS who have gained the trust and support of school leaders, Instructional Superintendents, teachers, and colleagues across Program schools. Third, the leadership of Mr. Jorge Robles, ELA Program Director, has become more defined. He has continued the vision and efforts of former director, Dr. Darlene LeDoux, and built coalitions with other departments and offices across the district. Mr. Robles has a strong leadership team and we've been impressed by how cohesively they continue to work together. Partnerships with the Special Education Department; the Assessment, Research, and Evaluation Office; the Family and Community Engagement Office; and the Department of Curriculum and Instruction are areas of strength that we've witnessed.

The nonprofit Great Schools Partnership suggests that educators often use the term capacity or capacity building to describe, “the quality of adaptation.” More specifically, capacity refers to the capability of a district, school, or educator to develop, advance, or get better. Over the past four years and especially during the period that this report covers, we have seen the Denver Public Schools make progress and get better in many areas toward meeting the requirements of the CD. We believe that the findings we’ve discussed in this report reflect this position.

Following is our opinion of the level of DPS implementation of each of the five chapters we spot audited followed by a series of recommendations:

Chapter 7-- Federal and state guidelines specify the information that must be included in DPS IEPs and 504 plans. The district must additionally address the requirements of the CD regarding information specific to ELs that should be included in those documents. Based on our review of 49 IEPs and 29 504 plans, our on-site interviews with school staff, and our meetings and phone conversations with DPS Central Office staff, we feel that DPS is partially implementing the Chapter 7 CD requirements for sections A through G (the sections of that chapter we spot-audited). Three-quarters of the IEPs we reviewed contained the information we expected to see on three of the four indicators for which we sought documentation, nearly 90% of the IEPs had information on the fourth indicator, and none of the IEPs had information for the fifth indicator. The district’s 504 plans reflected a higher level of CD implementation, with 100% addressing three of the four indicators we documented and 90% addressing the fourth.

As noted in the discussion of the Chapter 7 data, the district described how they have addressed the missing information in the IEPs, and we plan to conduct another spot audit of IEPs in February 2018 to verify whether the actions DPS reports having taken have resulted in a higher level of implementation of the Chapter 7 A through G requirements as well as to document implementation of the requirements in Chapter 7 H through N.

Chapter 3--This chapter of the CD contains 48 requirements. It is sufficiently comprehensive that we felt the need to conduct two separate onsite visits to DPS and collected data at 16 schools that are representative of schools across DPS. Based on interviews with 36 parents representing multiple language groups, interviews with school secretaries at eight schools, and discussions with teams of school leaders, assessment leads, and teachers at eight different schools, we are confident that DPS has systems/practices in place to ensure consistent implementation of those provisions of Chapter 3 across the district. Central to forming this opinion was the feedback from parents who generally felt that schools were providing them with sufficient information to make informed decisions about the language instruction options for their children. Additionally, we felt that the secretaries whom we interviewed and who assume a major role planning and carrying out Registration are doing so effectively. They followed the Registration procedures that the district requires and that follow the requirements of the CD. The conversations with school teams reinforced what we heard from parents about the transmission of information in languages they understand. Also, school teams that we interviewed all followed the pre-and post-Registration requirements of the district and outlined in the CD.

Chapter 2--There are no other districts that we know of or have worked with that have Instructional Services Advisory (ISA) Teams in the way that DPS does. The framers of the CD used a great deal of vision is creating the concept of ISA Teams. We have been interacting with ISA Teams for nearly all of the time that the IM has served in this capacity. I have observed the format and quality of training for all ISA Team members and how it has improved over the years. DPS has made a strategic hire by appointing an ELA Network partner to be the point person from the ELA Program to schools on issues that are ISA related. A major concern that the DOJ and CHE have raised about how ISA Teams weigh conflicting data when making redesignation/exit decisions was addressed with depth by all of the teams we interviewed. Most importantly for us, we actually saw ISA Teams conducting meetings in real time and in a non-simulated manner. They addressed the individual cases of students eligible for redesignation/exit and held long and objective based deliberations before making decisions. We actually saw how ISA Teams handled the question of conflicting data and more often than not, erred on the side of caution and chose to continue to provide students with Program services rather than redesignating them. Based on our interviews and observations and given the limitations of a small sample size, it's our opinion that DPS is meeting this requirement of the CD for the ISA Team decisions we examined. As noted earlier in our report, we did not examine records related to PPF3 monitoring due to the fact that the window for those decisions was not open prior to our visit. Further, we did not observe any consideration of, or examine evidence related to, Program reentry; thus, we do not draw conclusions about those ISA Team functions, and they would be a logical focus for further examination of Chapter 3 implementation.

Chapter 8--There are three requirements in the CD regarding Charter Schools. We prepared a 17 item spot-audit checklist for use at school site visits and interviewed school and DPS administrators to examine these three requirements as completely as possible. We recognize that charter schools in DPS are a political issue and certainly not without debate. Our approach has been to remain as neutral and even-handed as possible and continue to be removed to the extent feasible from any emotional debates or deliberations unless these issues impact the requirements of Chapter 8 adversely. Our data based on seven schools we visited did point to one glaring issue that CHE and the DOJ have commented on continuously. That is that charter schools in Denver seem to serve a small percentage of ACCESS Level 1 students. Our data supports this contention. We feel that until they serve a much greater number of ACCESS 1 students, it will be difficult to more fully address their effectiveness in meeting the needs of ELs whose parents opt for Spanish language instruction. However, based on our interviews with school directors or principals, teachers, Charter ISA (Ch ISA) Team members and other staff; our document review and observations related to ELA services provided at charter schools; and our interviews with DPS Central Office staff responsible for monitoring ELA services at charter schools, we are of the opinion that DPS is meeting the three requirements outlined in Chapter 8. The parties have received a verbal commitment from the district that in the future, any Charter Schools that might replace TNLI schools will have to meet all requirements outlined in the CD for TNLI schools.

Chapter 6--There are two distinct features of parental oversight outlined in the CD. One is the question of whether an ELA PAC is in place at every Program school and whether they are meeting the intent of Chapter 6, which is to create school-based advisory committees that focus on parents of ELs receiving Program services and who are informed about the ELA Program and other school-based issues in regularly scheduled meetings. A second feature of this chapter centers on the creation of a District Advisory Committee (DAC) that serves a larger audience made up of parents from all Program schools district-wide. The

DAC is also intended to disseminate information about the ELA Program to participants, apprise parents about language instruction options, seek and gather parent concerns, and report to the DPS Board annually. Based on our interviews with parents from seven schools, attendance at numerous PAC meetings, a review of data provided us from the district, participation in a DAC meeting including a separate meeting with the DAC's advisory board, we offer the following opinion. The district is making progress in meeting part of the requirements of Chapter 6. Of major concern at the time that we gathered our evidence is the fact that at a most basic level, there were still Program schools that did not yet have an ELA PAC in place. This was concerning because I have made the recommendation numerous times to the ELA Department and to the Family and Community Engagement Office (FACE) that the CD calls for an ELA PAC as outlined in the CD at every Program school.

Although this last issue had not been fully addressed at the time we collected data, we recently met with an ELA Department staff person who is now charged with assuring that, during the 2017/18 school year, every Program school will have an ELA PAC in place. We were joined at this meeting by Martha Urioste who was there representing CHE. The report we received from the ELA staff member was very encouraging. The ELA Network Partners have been assigned the responsibility of assuring that ELA PACs will be in place during the current school year.

The data that we reviewed regarding the DAC was quite positive. The DAC meets monthly, the attendance by parent representatives is significant, there is a DAC Advisory Board in place comprised of parents who were selected by parent participants, and a comprehensive outreach effort is in place to continue increasing the size of the DAC. Our opinion is that DPS is partially meeting the requirements of Chapter 6. Further, when the district can show evidence that an ELA PAC is in place and convening regularly and meeting CD requirements, the district will be much closer to meeting the requirements of Chapter 6. Because we have witnessed the work of the ELA Network Partners, we feel confident that they will be able to accomplish this during the 2017/18 school year. With regard to the DAC, we feel that this requirement is being met successfully. After carefully reviewing DAC meeting agendas, notes, sign-in sheets, their annual report to the Board, and attending their monthly meetings, our opinion about the DAC is favorable.

Recommendations:

The following recommendations are an outcome of over 15 months of collecting evidence regarding the five chapters of the CD that we spot audited.

1. Our review of IEPs and 504 plans for implementation of Chapter 7 requirements leads us to make two recommendations regarding IEP and 504 plan content. Our first recommendation is that DPS provide models for how to explicitly link ELs' language proficiency to academic performance in the appropriate section of the IEP (perhaps the Present Levels of Performance section in which a student's assessment results are summarized and where, for example, ACCESS subtest scores for each language modality could be linked to CMAS subtest performance, course grades, and productive or receptive oral and written language issues observed by teachers in the classroom and on assignments). Based on the documents we reviewed, this is not as big an issue for 504 plans, but it would still be useful for the district to clarify how this CD requirement should be explicitly addressed in 504 plans. Secondly, it's important that IEP information specific to ELs be included in all IEPs, just like we would expect to see other required IEP components like annual goals, types of service, location of services, and duration of services. DPS has described the actions they have taken to ensure that the Student and Family Information section of the IEPs will contain required information for ELs specified in Chapter 7 Section F, and they should take action as well to ensure that all IEPs also include the information required by the other sections of Chapter 7.

2. An area where secretaries at times seemed unsure about one CD requirement that is outlined in the district's Registration Checklist is requirement 3.B.4 dealing with provisional placement in the Program. We recommend that Program schools provide training to secretaries prior to registration and discuss this requirement of the CD. It will enhance all secretaries' ability to address this issue or answer questions that parents might have about provisional placement of their children.

3. ELA Program staff who are directly responsible for ensuring that CD Chapter 2 requirements are met should convene a strategic planning session where a concise "state of the state" of ISA Teams report is prepared. This information could then be disseminated to ISA Teams district-wide through the numerous outreach mechanisms that DPS has including the Newsletter that gets sent out weekly. If there are issues or concerns that get identified as occurring with some frequency, such as how to apply the new WIDA standards in redesignation/exit decisions, suggestions for fixing them could be incorporated into the annual training required of ISA Team members.

4. We recommend a meeting between charter school representatives and the parties when they meet in April of 2018. There are risks involved in such a meeting but it would be productive to begin a dialogue where CHE and the DOJ can express some of their concerns and charter schools could share some of their perspectives regarding the requirements of the CD.

5. We recommend that DPS provide a report to the parties at their April 2018 meeting that addresses whether the district has been successful in ensuring that every Program school in the district has an ELA PAC that has convened and, if not, what efforts are underway to meet this CD requirement immediately. Additionally, the district should report on whether every Program school has an identified DAC representative and, if not, what efforts are underway to ensure that this happens immediately.

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Appendix 1
CD Chapter 7 Spot Audit Checklist

Denver Public Schools School Site Visit Spot Audit, CD Chapter 7

School ________________________ Date______________

File # __________ Check one: ______ IEP ______ 504 Plan

CD Chapter 7 Section	Evidence/Notes
7.A. "IEP and 504 teams shall include a fully qualified ELA-E or ELA-S teacher . . ."	Team membership on attendance/signature page. Check with School regarding ELA-E or ELA-S status Yes ___ No ___ Notes:
7.F. "ELLs' IEPs and 504 plans shall document that the student is an ELL, the student's language proficiency level. . ."	504 Plan, Page 1, Section E filled out. IEP, Page 1, Section 3 ELL information filled out. Yes ___ No ___ IEP, Section 7F filled out. Yes ___ No ___ Notes:
7.F. "ELLs' IEPs and 504 plans shall document . . . the Program services the student is receiving (i.e., ESL/ELA-E, TNLI) . . ."	Documentation of the Program services the student is receiving (i.e., ESL/ELA-E, TNLI) Yes ___ No ___ Notes:
7.G. "The district shall maintain in all ELLs' IEPs or 504 plans . .(b) an analysis of the effect of proficiency in English and other languages on the student's learning, including an analysis of the student's assessment results in relation to the student's language proficiency"	Yes ___ No ___ Notes:

Appendix 2
CD Chapter 3 Parent Interview

Chapter 3 Parent Interview Draft 1

School ____________________________ Date ____________

Total number of parents participating in the interview ____________

Note: Enter the number of parents in the group choosing each alternative or responding affirmatively to the item.

1. Did you fill out a home language questionnaire (HLQ) when your child registered here in the school?
   _____ Yes
   _____ No
   _____ Not sure, don’t remember

2. How many of you stated on the HLQ that the primary language spoken in your home or by your child was Spanish (or a language other than English)? _______

OF THOSE WHO ANSWERED ITEM 2 AFFIRMATIVELY:

3. Did the School give you an ELA Parent brochure that explained the two options for the language used to teach your child?
   _____ Yes
   _____ No
   _____ Not sure, don’t remember

4. Did you view a video explaining the language instruction options?
   _____ Yes
   _____ No
   _____ Not sure, don’t remember

5. After viewing the video and going over the brochure, did you understand the two options?
   _____ Yes
   _____ No
   _____ Not sure, don’t remember

Comments (esp regarding reasons for lack of understanding):

6. Was someone at the school able to answer questions you had about the options?
   _____ Yes
   _____ No
   _____ Did not have questions

Comments (esp regarding inability to get questions answered)

7. What option did you choose for your child?
   _____ PPF1
   _____ PPF2
   _____ Other (e.g., PPF3, didn’t choose)

Reasons for choosing the option:

8. What was helpful to you as you went through the registration process with your child (e.g., information or people who were helpful)?

9. What could Denver Public Schools do to improve their student registration process?

Appendix 3
DPS and John Amesse Elementary
Secretary Registration Checklists

ELA REGISTRATION PROCESS
Secretary Checklist

Prior to Registration

- ☐ Be clear and knowledgeable about the registration process.
- ☐ Identify who the Principal has appointed as the ELA registration point person.
- ☐ Read the ELA Parent Brochure, *English Language Learning Choices.*
- ☐ View the ELA Parent video, *English Language Learning Choices.*

Registration Procedure for New Stidemts

☐ **Home Language Questionnaire (HLQ):**

- o Distribute the Home Language Questionnaire (HLQ) to each parent of a new student.
- o Once a parent completes the HLQ, enter the parent responses into Infinite Campus ***and*** upload the form to the Documents tab of the Registration folder in Infinite Campus.

☐ **Parent Permission Form (PPF):**

- o If a parent indicates any language other than English on the HLQ, follow each of the steps below to ensure parents are making an informed decision regarding the placement of their student:
  - Give parent the ELA Parent Brochure, **and**
  - Have parent watch the ELA video **and**
  - Have parent discuss any questions with an ELA registration point person, **then**
  - Have parent complete the Parent Permission Form (PPF).
- o Once the PPF has been signed, enter the response into Infinite Campus ***and*** upload the form to the Documents tab of the Registration folder in Infinite Campus.
- o If a parent's response to any question on the HLQ is Spanish and the parent is not registering at a TNLI School, the parent must be offered the option to receive ELA-S instruction at their TNLI Zone School with transportation provided by DPS.

☐ **Newcomer:**

- o If you determine that a student is a potential newcomer, communicate to the parent that the student is eligible to attend a Newcomer Center. If the parent chooses this option, please complete the Newcomer Intake Form.
- o If the parent chooses to stay at your school, please check the Newcomer Referral Checkbox when building the household profile in the *ELA District Tab* in Infinite Campus.

YOU HAVE SUCCESSFULLY COMPLETED THE ELA REGISTRATION PROCESS!

After Registration

☐ **Remember the following processes for PPF Option 3:**

- o PPF Option 3 is only available after a student is W-APT tested, assessment results are mailed to parents, and parents confer with the classroom teacher and/or administrator. Verify that the school Administrator has completed the bottom portion of the sheet titled "For Internal Use Only", as the reasons for waiver of services need to be fully explained. Do not process a PPF Option 3 form without this completed section.

- o Contact Lucero Elizondo to request a Parent Permission Form Option 3.
- o Print a Parent Choice Office Log to document Option 3 students. This is an auditable document, and must be filled out completely.

Additional resources for parents and staff

✓ **ELA Hotline at 720-423-2040**

dps/ela/08032016

Denver Public Schools
ELA Registration Process
John Amesse Elementary

Prior to Registration

- Be clear and knowledgeable about the registration process.
- Lupe will lead the ELA registration process and be the ELA registration point person.
- Create schedule for registration.
- Read the ELA Parent Brochure-English Language Learning Choices.
- Prior to registration review the ELA video, English Language Learning Choices.
- Arrange for a minimum of 4 laptops with headphones for a parent language information station.
- Print out or organize ELA Parent Brochures.

Registration

- Hand out a Home Language Questionnaire (HLQ), to all new students' parents.
- In addition, if parents indicate any language other than English on the Home Language Questionnaire, provide a PPF form to also be filled and returned with registration packet.
- Check all laptops to ensure links, etc. are working.

Stations Required:

- Parent portal station
- Video from ELA station (see Questionnaire section below)
- Uniform station (ordering and pick up?)
- Family handbook station
- Copier station

Questionnaire (HLQ):

- Parents receive the ELA Parent Brochure
- Parents watch the ELA video
- Parents discuss any questions with an ELA registration point person (Lupe and Juanita)
- Parents complete the Parent Permission Form (PPF).

After Registration

- Enter the HLQ form data as required in Infinite Campus.
- Upload HLQ into Infinite Campus.
- Enter the PPF (if applicable) data as required in Infinite Campus.
- THEN, Upload PPF into Infinite Campus.
- Provisional ELs will be provisionally (temporarily) placed/scheduled in ELA classroom/courses.
- Provisional ELs will be tested (by SAL/teacher) according to district procedures.
- Parents of Provisional ELs will be notified of test scores (through NCLB letter).

REMEMBER:

- During registration, parents may only select Option 1 or 2 on the PPF (remember Option 3 is NO LONGER an option during registration).

Permission Form (PPF):

- Parent Permission Form with Option 3 is only available after a student is W-APT tested, the assessment results are mailed to the home, and the parents confer with the classroom teacher or an administrator.
- Print a Parent Choice Office Log to document Option 3 students. This is an auditable document, and must be filled out completely.

Within the First 30 Days After Registration

- Students are assessed (W-APT) if applicable.
- ISA teams identifies students with teachers' support.
- Teachers provide BOE for identification.
- ISA notifies teacher of placement and student specific needs.

Appendix 4
CD Chapter 3 Spot Audit Checklist

Chapter 3 Spot Audit Checklist

School ______________________________ Date _____________

3.II. ***Systematically select 10 students from the total # who registered at the school. Total # _____***

1. HLQ filled out
2. HLQ entered into IC
3. HLQ uploaded into IC

	1		2		3	
	Yes	No	Yes	No	Yes	No
Student 1	___	___	___	___	___	___
Notes:						
Student 2	___	___	___	___	___	___
Notes:						
Student 3	___	___	___	___	___	___
Notes:						
Student 4	___	___	___	___	___	___
Notes:						
Student 5	___	___	___	___	___	___
Notes:						
Student 6	___	___	___	___	___	___
Notes:						
Student 7	___	___	___	___	___	___
Notes:						
Student 8	___	___	___	___	___	___
Notes:						
Student 9	___	___	___	___	___	___
Notes:						
Student 10	___	___	___	___	___	___
Notes:						

3.III. ***Systematically select 10 students from the total # who indicated LOE on HLQ. Total # _____***

1. PPF filled out
2. PPF entered into IC
3. PPF uploaded into IC

	1		2		3	
	Yes	No	Yes	No	Yes	No
Student 1	___	___	___	___	___	___
Notes:						

3.III Continued

	1 (filled out)		2 (entered IC)		3 (uploaded IC)	
	Yes	No	Yes	No	Yes	No
Student 2	___	___	___	___	___	___
Notes:						
Student 3	___	___	___	___	___	___
Notes:						

Student 4	___	___	___	___	___	___
Notes:						
Student 5	___	___	___	___	___	___
Notes:						
Student 6	___	___	___	___	___	___
Notes:						
Student 7	___	___	___	___	___	___
Notes:						
Student 8	___	___	___	___	___	___
Notes:						
Student 9	___	___	___	___	___	___
Notes:						
Student 10	___	___	___	___	___	___
Notes:						

3.III.A

1. Name of Designated Administrator trained to explain ELA to parents ___________________________

2. What training did you receive from DPS to explain ELA services to parents?

Principal Checklist

1. ELA Parent Choice Log (Parent PPF3 Selection Office Log) filled out Yes ____ No ____

Notes (If the school has both, indicate here Yes/No for each):

3.IV.A. ***Systematically select 10 students whose HLQ indicates LOE. Total # ___***

	Date Registered	Date ELP Assessment	ELP Assessment	≤ 25
Student 1	_____________	_________________	_____________	
Student 2	____________	_________________	_____________	___
Student 3	_____________	_________________	_____________	___
Student 4	____________	_________________	_____________	___
Student 5	_____________	_________________	_____________	___
Student 6	____________	_________________	_____________	___
Student 7	_____________	_________________	_____________	___
Student 8	____________	_________________	_____________	___
Student 9	_____________	_________________	_____________	___
Student 10	____________	_________________	_____________	___

Appendix 5
CD Chapter 2 Spot Audit Checklist

ISA Checklist Version 2

School ____________________________________ Date ____________

I. Team Membership (CD 2.C)

ELA Program School
___ Principal or Administrator Designee
___ Fully Qualified ELA-E or ELA-S Teacher
___ Second Teacher
___ Additional Members? Specify.

Non-Program School
___ Principal or Administrator Designee
___ Fully Qualified ELA-T Teacher
___ Second Teacher
___ Additional Members? Specify.

II. ISA Training (CD 5.XI)

___ Principal or Administrator Designee. Most recent training date ____________
___ Teacher 1. Most recent training date _________________
___ Teacher 2. Most recent training date _________________
___ Other member(s). Most recent training date _______________

III. ISA Meeting Documentation (DPS ISA Guidebook)

___ Meeting Schedule (# of meetings scheduled for 2016-17 ____ ; # of meetings held in 2015-16 ____)
___ Meeting Agendas (___2015-16 ___ 2016-17)
___ Meeting Minutes (___ 2015-16 ___ 2016-17)

IV. ISA Observation (DPS ISA Guidebook, CD 2.B, CD 2.A-D)

___Agenda available
___ Minutes recorded
___ Other Attendees? Specify:

<u>ISA Activities Occurring During the Meeting</u>. Describe each activity, including types of evidence considered and recommendations or decisions made. Make note of redesignation, reentry, and exit decisions as well as decisions about change of service. Identify DPS forms used or filled out as part of each activity.

___ Reviewing services provided to newly identified ELs, including Newcomers

School ________________________________

IV. ISA Observation (continued)

___ Monitoring identification of ELs to identify potentially inappropriate identification and placement

___ Reviewing English language proficiency (ELP) and academic progress of all ELs, including those who have declined services – PPF3 students.

___ Identification of ELs in need of intervention, as indicated by objective data and collaboration with appropriate staff, to address the student's instructional needs

V. Questions

1. How has the automated system used to compile ISA data for students been working for you? Do you have any suggestions for the District about how to improve it?

2. In redesignation decisions, how does your ISA team weigh, or reconcile, conflicting data in cases where some data indicate a redesignation should be recommended yet other data indicate there should *not* be a redesignation?

School ________________________________

VI. Document Review

Student 1
Decision:
Assessment data:
Student 2
Decision:
Assessment data:
Student 3
Decision:
Assessment data:
Student 4
Decision:
Assessment data:
Student 5
Decision:
Assessment data:
Student 6
Decision:
Assessment data:
Student 7
Decision:
Assessment data:
Student 8
Decision:
Assessment data:
Student 9
Decision:
Assessment data:
Student 10
Decision:
Assessment data:

Appendix 6
CD Chapter 8 Spot Audit Checklist

Chapter 8 Spot Audit Checklist

School ___________________________________ **Date ____________**

I. ELA Program

A. Administrator/Administrator Designee Interview

1. Name & position of school administrator or administrator designee with ELA expertise who provides oversight and evaluates the effectiveness of ELA services provided by the school

Name ______________________________ Position ______________________________

2. Evidence of ELA expertise on the part of the ELA administrator or designee (e.g., degree(s), license/endorsement areas, experience with ESL/bilingual education)

3. What training has DPS provided to you for your role as the person who oversees and evaluates the effectiveness of ELA services at your school?

4. Describe how you provide oversight of ELA services at your school.

5. Describe how you evaluate the effectiveness of the ELA services at your school.

6. What could DPS do to provide additional support for ELA programs in Charter Schools?

School _________________________________

B. ELL List/ELD Scheduling Report

1.Date of Report __________

2. ELD enrollment & explanation of discrepancies (check & record on the ELL List/Scheduling Report)

3. PPF designation for each ELL student (check & record on the ELL List/Scheduling Report)

II. CH-ISA Process

A. CH-ISA Team

1. Membership

Member	*Endorsement/Certification*
___ Principal or Administrator Designee	___ ELA-E __ ELA-S __ ELA-T
___ Teacher 1	___ ELA-E __ ELA-S __ ELA-T
___ Teacher 2	___ ELA-E __ ELA-S __ ELA-T

___ Teacher 3 ___ ELA-E __ ELA-S __ ELA-T
___ Other _________________________ ___ ELA-E __ ELA-S __ ELA-T
2. CH-ISA Training (Check if participated in training)
___ Principal or Administrator Designee. Most recent training date ____________
___ Teacher 1. Most recent training date _________________
___ Teacher 2. Most recent training date _________________
___ Teacher 3. Most recent training date _________________
___ Other member(s). Most recent training date _______________

3. CH-ISA Meeting Documentation
___ Meeting Schedule
___ Meeting Agendas
___ Meeting Minutes
___ Other documentation (e.g., body of evidence)

School _______________________________
B.CH-ISA Meetings
1. How often does the CH-ISA Team meet?
2. Describe a typical CH-ISA meeting.

3. Describe the body of evidence the CH-ISA Team typically reviews for each of the following decisions in the "life cycle" of an English Language Learner.
a. Identification &registration of a student as an EL

b. Placement in ELA services (include information on parent waiver requests)

c. Redesignation

d. Monitoring of student progress after redesignation

4. How has the automated system used to compile CH-ISA data for students been working for you? Do you have any suggestions for the District about how to improve it?

5. In redesignation decisions, how does your CH-ISA team weigh, or reconcile, conflicting data in cases where some data indicate a redesignation should be recommended yet other data indicate there should *not* be a redesignation?

School ________________________________

C. CH-ISA Document Review

Student 1
Decision:
Assessment data:
Student 2
Decision:
Assessment data:
Student 3
Decision:
Assessment data:
Student 4
Decision:
Assessment data:
Student 5
Decision:
Assessment data:
Student 6
Decision:
Assessment data:
Student 7
Decision:
Assessment data:
Student 8
Decision:
Assessment data:
Student 9
Decision:
Assessment data:
Student 10
Decision:
Assessment data:

Appendix 7
CD Chapter 6 Spot Audit Checklist

PAC Interview Questions & Meeting Observation Form

School _________________________ Date ____________________

PAC Interview Questions

Positions or roles and # of interviewees:

1. When was the PAC first started in this school? _________________

2. Is the PAC a subcommittee of a larger committee or a "stand-alone" committee?

   _____ Subcommittee (specify larger committee) _____________________
   _____ "Stand-alone" committee

3. How are members of the PAC chosen?

4. How often does the PAC meet?

5. How are PAC meetings documented?

	Observed?
____ Sign-in sheets	____
____ Meeting agendas	____
____ Meeting schedule for the year or semester	____
____ Meeting minutes	____
____ Audio recording	____
____ No written documentation	
____ Other (describe)	

6. Describe what happens at a typical PAC meeting.
   (Probe for: examples of information provided, review or discussion of the school's implementation of the ELA program, discussion of parent concerns)

7. What type of assistance has the School or the District provided in organizing the PAC and assisting the PAC in its activities here at the School?

8. Who represents the School on the DAC?

9. What could the School or the School District do to provide additional support for your PAC?

10. Does the PAC provide information to parents or others outside of PAC meetings? If yes, describe type of information and how it is provided.

PAC Meeting Observation

11. How many parents are in attendance?
12. Others in attendance? (# and position/role)
13. Describe the activities that occur during the PAC meeting (issues addressed, information provided, etc.)