



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE FOR CIVIL RIGHTS

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REGION IX
CALIFORNIA

June 1, 2017

Dr. James H. Hammond
Superintendent
Ontario-Montclair School District
950 West D Street
Ontario, California 91762

(In reply, please refer to OCR case no. 09-09-5002).

Dear Superintendent Hammond:

The U.S. Department of Education, Office for Civil Rights (OCR), has completed the resolution of the above-referenced compliance review of the Ontario-Montclair School District (District). OCR investigated whether the District has discriminated against English learner (EL or English learner) students on the basis of their national origin language minority status and/or on the basis of disability in the pre-referral, referral, evaluation and placement of these students into special education programs and services. Specifically, OCR investigated the following two issues:

1. Whether the District has an educational program, with qualified staff and appropriate materials, to ensure that EL students receive English language instruction that is designed to teach them English within a reasonable period of time and provide meaningful access to the District's educational program; and
2. Whether the District has referred, evaluated and placed EL students in special education programs in a nondiscriminatory manner.

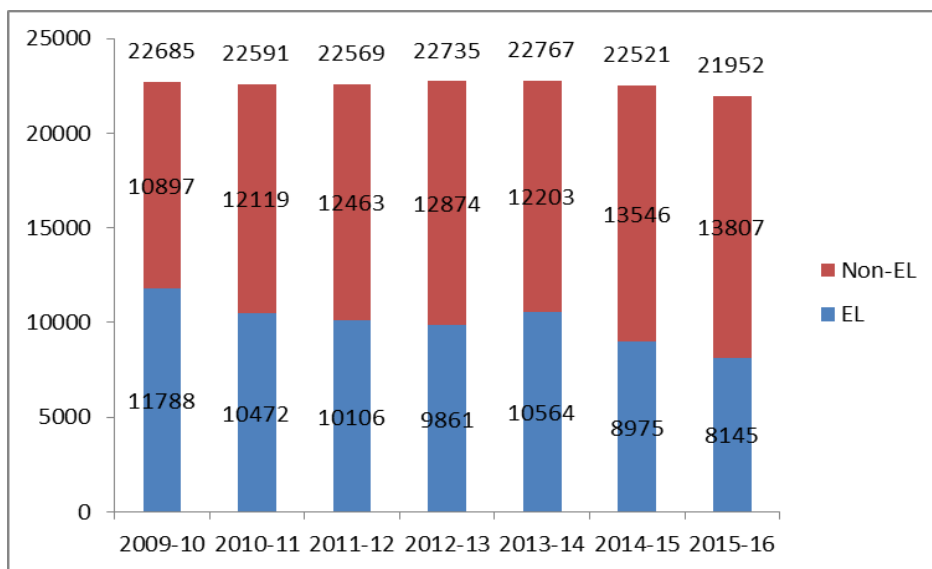
This compliance review was conducted pursuant to OCR's authority under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, and its implementing regulation found at 34 C.F.R. Part 100, which prohibit discrimination on the basis of race, color, and national origin, and under Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, and its implementing regulation found at 34 C.F.R. Part 104, which prohibit discrimination on the basis of disability. OCR also has authority as a designated agency under Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132, and its implementing regulation found at 28 C.F.R. Part 35, which prohibit discrimination based on disability by public entities. The District is a recipient of federal financial assistance from the Department and is a public education entity. Therefore, OCR has jurisdiction to investigate the issues addressed in this compliance review.

Background

This compliance review spanned seven school years from 2009-10 through 2015-16¹. The District is located in San Bernardino County in southern California and serves elementary and middle school students through eighth grade. In 2009-10, the District enrolled 22,685 students; the student population was predominately Hispanic or Latino at 87%, followed by 5% White, 3% African American, 3% Asian², and less than 1% American Indian/Alaska Native. Of the 22,685 students, 11,788 (52%) were EL; about 97% of the EL students had a primary or home language of Spanish, followed by Vietnamese (1%); other languages represented in the EL student population included Filipino, Arabic, Tongan, Indonesian, Arabic, Mandarin, Cantonese, and Khmer. OCR’s investigation focused on the Spanish-speaking students due to their high concentration within the District. In September 2009, the District reported 2,207 students in special education and 30 students with Section 504 plans, of whom 1,227 (about 56%) were EL.

The District’s student enrollment has decreased slightly since 2009-10. In 2015-16, the District served 21,952 students. The District’s student population remained predominately Hispanic or Latino at 90%, followed by 4% White, 2% African American, and 2% Asian. 8,145 students (37%) were EL, with 7,956 (98%) having a primary or home language of Spanish, followed by Vietnamese (1%) and the other languages noted above. In February 2016, 2,795 students were in special education, of whom 1,217 (43.5%) were EL. *Figure 1* shows the annual change in the District’s total and EL student populations for the seven years under review.

Figure 1: Annual Change in the District’s Total and EL Student Populations



OCR’s investigation examined the District’s educational program for English learners, including identification, placement, monitoring, exiting, and program evaluation, and the District’s process

¹ OCR notified the District that it was initiating this compliance review in April 2009, and began collecting information from the District beginning with the 2009-10 school year.

² This figure includes Pacific Islander and Filipino.

for referring, evaluating, and placing English learners for special education services. OCR reviewed District documentation related to its EL and special education services, including: all relevant District policies and procedures; materials describing the EL program at each school in the District; EL student enrollment, language acquisition, and achievement data; and information related to EL program changes and modifications. OCR also interviewed key District administrators, including the superintendent, assistant superintendent, and special education director and reviewed data available on the California Department of Education (CDE) website to assess the impact of the District's EL programs.

Based on the initial information gathered at the onset of its investigation, OCR selected five schools for closer examination: Arroyo ES, Euclid ES, Vineyard STEM magnet³, De Anza MS, and Wiltsey MS. OCR considered a number of factors in selecting these schools, including: the proportion of Latino student enrollment at each school and enrollment feeder patterns (OCR selected schools with high and low EL populations, as well as a magnet school). During onsite visits to the District in November 2009 and January 2010, OCR interviewed numerous individuals, including District administrators overseeing the District's EL and special education programs, and all District school psychologists and speech pathologists. For the five schools selected, OCR met separately with the school's administrative leaders, school psychologist, and speech pathologist to learn more about the school's EL and special education programs; conducted classroom observations; interviewed multiple teachers; and reviewed a set of student files.

As discussed herein, OCR's investigation revealed that in the 2009-10 and 2010-11 school years the District was out of compliance with federal law in its obligation to provide EL students, including EL students with disabilities, with appropriate language instruction and access to grade level curricula. Subsequently, the District revised its organizational structure and District personnel have taken steps to address the noncompliance related to its EL program. In this regard, during the 2012-13 school year, the District appointed an individual to oversee its English learner program as its Director of Curriculum and Instruction for English Language Development (Director), in conjunction with the Assistant Superintendent for Learning and Teaching (Assistant Superintendent).

OCR reviewed data and information related to the District's efforts and, for the 2014-15 and 2015-16 school years, OCR identified several areas of deficiencies with respect to the provision of services to EL students with and without disabilities, including with respect to placement and provision of effective services to such students, training for staff implementing the District's language assistance programs, and the District's evaluation and monitoring systems for such programs.

Prior to OCR completing its investigation in these areas and reaching a compliance determination, the District expressed an interest in resolving this compliance review. To complete its investigation, OCR would need to conduct additional interviews and analyze language acquisition and achievement data at more school sites for all EL students, including

³ In 2008-09, Vineyard became a magnet school for science, technology, and engineering and included grades K-6; grade 7 was added in 2009-10 and grade 8 was added in 2010-11 (after OCR's onsite visits).

EL students with disabilities. Based on its investigation to date, OCR determined that it was appropriate to resolve this compliance review with the enclosed Resolution Agreement (Agreement), which requires the District make additional modification and changes to its EL program and services.

The Agreement requires the District to retain an expert to make changes and modifications to its EL program and services including, among other items: (1) complete and effectively implement a comprehensive EL plan for how the District will identify and place and provide English language services and instruction to all EL students, including how it will ensure the timely evaluation and provision of services for EL students with disabilities; (2) take further steps to provide notice to parents about the comprehensive EL plan and the interventions and services that are available to EL students who are not making expected progress; (3) finalize the development of and implement a comprehensive training plan for administrators, teachers, and special education evaluators on their responsibilities to implement the comprehensive EL plan; (4) engage in additional actions to ensure that English language development test scoring is accurate and reliable so that students are appropriately placed for provision of EL services; and (5) evaluate and monitor the effectiveness of the EL program and provide annual progress reports to OCR regarding the same.

This letter provides the applicable legal standards, and OCR's factual findings and determinations.

Issue 1: Whether the District has an educational program, with qualified staff and appropriate materials, to ensure that EL students receive English language instruction that is designed to teach them English within a reasonable period of time and provide meaningful access to the District's educational program.

In evaluating a recipient's program and services for English learner students for compliance with Title VI and its regulations,⁴ OCR analyzes compliance with respect to the program components described below:

A. Identifying and Assessing All Potential EL Students

Legal Standard

The Title VI implementing regulation, at 34 C.F.R. §100.3(a), states that no person shall, on the grounds of national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving federal financial assistance. The regulation, at 34 C.F.R. §100.3(b)(1)(i)-(vi), further states, in relevant part, that a recipient may not, on the grounds of national origin, deny an individual any service or benefit of its programs; provide any services or benefits to an individual which are different or provided in a different manner; treat an individual differently in determining continued enrollment in its

⁴ In determining whether a school district's program is in compliance, OCR applies the standards set forth in Castaneda v. Pickard, 648 F.2d 989 (5th Cir. 1981).

programs; or, deny an individual an opportunity to participate in a program through the provision of services which is different from that afforded others under the program. The regulation, at 34 C.F.R. §100.3(b)(2), also provides that a recipient may not utilize criteria or methods of administration that have the effect of subjecting individuals to discrimination on the basis of national origin, or have the effect of substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular national origin.

On May 25, 1970, pursuant to its authority under Title VI, the Department of Education issued a memorandum entitled "Identification of Discrimination and Denial of Services on the Basis of National Origin" (May 25, 1970), reprinted in 35 Fed. Reg. 11,595 (July 18, 1970) (hereinafter May 25th memorandum). The memorandum clarified OCR policy under Title VI on issues concerning the responsibility of school agencies to provide equal educational opportunity to limited English proficient national origin minority students. The memorandum states, in part, that school districts must take affirmative steps to address the language needs of English learners. To do so, school districts must have procedures in place to accurately and timely identify potential EL students.

Factual Findings, Analysis, and Conclusions of Law

OCR reviewed the District's planning document for English Learners called the "Master Plan for English Learners" (EL Master Plan), which was last updated in January 2010. The EL Master Plan required parents to complete a home language survey (HLS) at the time of student enrollment. If the HLS indicated a language other than English, the District was required to assess the student in English using the California English Language Development Test (CELDT) within 30 days of enrollment and in the student's primary language within 90 days of enrollment. If the student scored at a Beginning, Early Intermediate, or Intermediate level overall on the CELDT (*i.e.* CELDT levels 1, 2, or 3), the student was identified as an English learner and placed in an EL program. If the student scored at an Early Advanced or Advanced level overall on the CELDT (*i.e.* CELDT levels 4 or 5), with no subscore below the Intermediate level, then the student was identified as initial fluent English proficient (I-FEP), placed in a "mainstream" program, and monitored for six months to ensure academic success. According to the District, all EL students were administered the CELDT test annually. Based on its investigation to date, OCR did not identify any areas of Title VI noncompliance with respect to the District's process for identifying EL students.

However, OCR identified a deficiency with respect to the District's local scoring of the annual CELDT tests. The District told OCR that it locally scored all CELDT tests and used the local scores to determine appropriate placement in EL program and services, pending receipt of the State's official scores. The District provided training each year to staff members who administered and locally scored the CELDT, but had not checked for consistency between the District's local scores and the State's official scores. At OCR's request, in February 2010, for each student who took the 2009 CELDT test, the District compared the overall score on the CELDT test as determined by the District and by the State. The District's analysis, which was verified by OCR, revealed that out of more than 11,116 students who took the test, the District's

score differed from the State's score by one or more levels in at least 10% of the instances. The District continued this same practice through the 2014-15 and 2015-16 school years. The District told OCR that starting in 2012-13, the District began conducting training to improve the accuracy of its local scoring; the District acknowledged that while accuracy has improved substantially, there was still some discrepancy between the two scores. Consequently, there is an ongoing compliance concern as to the accuracy and use of local scores in determining appropriate EL services for the 2009-10 through the 2015-16 school years.

B. Providing Language Assistance with Appropriately Trained Staff and Resources, and Meaningful Access to Grade Level Curriculum for EL Students

Legal Standards

Title VI and the May 25th memorandum require school districts to provide equal opportunity through affirmative steps to address language deficiencies and ensure effective participation, including by selecting a sound educational theory for their programs designed to provide effective participation for English learners, and by using practices, resources and personnel reasonably calculated to effectively implement their educational theory. Districts are expected to ensure their educational program produces results indicating that the students' language barriers are actually being overcome in a reasonable period of time, and to modify programs that are not successful. Districts also have a dual responsibility to teach students English and to provide them with access to the curriculum, taking steps to ensure that students are not left with academic deficits. This dual obligation requires school districts to design and implement EL programs that are reasonably calculated to enable EL students to attain both English proficiency and parity of participation in the standard instructional program within a reasonable period of time.

Factual Findings, Analysis, and Conclusions of Law

The District's EL program for the 2009-10 and 2010-11 school years was addressed in two documents—the EL Master Plan and the Base Program⁵—but they failed to set forth a plan for providing effective English language development (ELD) instruction to all EL students at every English proficiency level and contained conflicting information:

- For elementary grade levels, the EL Master Plan specified 30-60 minutes of daily ELD instruction for all EL elementary students at all CELDT levels, while the Base Program specified 20-30 minutes of daily ELD instruction.
- Within the EL Master Plan, there was conflicting information about the ELD materials that should be used at the elementary school level. One part specified the ELD

⁵ The EL Master Plan described the District's overall program and services for EL students, while the Base Program outlined the minimum required program for all students, including EL students, at each grade level, and specified the subject areas to be taught and amount of instructional time for each area.

materials for grades K-6 as Science Research Associates, Inc.'s (SRA) Language for Learning, SRA Language for Thinking, and SRA Language for Writing. In contrast, the Appendix to the EL Master Plan specified that SRA Language for Learning and SRA Language for Thinking should be used for EL students at lower CELDT levels and at lower grade levels (K-3) only; the Appendix did not specify SRA Language for Writing for any grade level or CELDT level, or specify ELD materials or curriculum for students at CELDT levels 4 and 5 in grades K-3. For grades 4-6, the Appendix specified that EL students at CELDT level 1 should receive Read 180 and the accompanying "L Book"⁶ and that EL students at CELDT level 2 should use either the Read 180 L Book or SRA Language for Learning; no ELD materials or curriculum were specified for EL students at CELDT levels 3 through 5 for grades 4-6.

- At the middle school level, the Base Program addressed grades 6-8 together, and all students were assigned to one of three categories based primarily on their performance on the English Language Arts (ELA) portion of the California Standards Tests (CST)—Intensive (lowest level), Strategic (middle level), or Benchmark (highest level). For the two lower levels (*i.e.*, Intensive and Strategic), ELD was supposed to be included in the instructional blocks with reading/language arts, with no amount of time specified for the ELD instruction within these blocks. For the highest level (*i.e.*, Benchmark), ELD was not mentioned at all. In contrast, the Appendix to the EL Master Plan (Page 72) addressed grades 7 and 8 together, and showed that EL students at CELDT levels 1 through 3 should be enrolled in a leveled "ELD Core" class for two periods daily. ELD Core was not described and there was no curriculum for it, nor was there any explanation of how ELD Core was integrated with the Base Program which merged ELD with ELA. OCR noted that the Base Program and the EL Master Plan used different criteria for student placement, with the former relying on CST (ELA portion) scores and the latter using the CELDT score.
- With respect to ELD materials at the middle school level, the Base Program listed three options for students at the Intensive level, one of which was Read 180. No ELD materials were specified for students at the Strategic and Benchmark levels. In contrast, Page 21 of the EL Master Plan identified Santillana Intensive English as the board-approved "ELD supplementary materials" for grades 6-8; this information was inconsistent with Page 72 of the EL Master Plan, which showed that EL students at CELDT levels 1 and 2 should be instructed using Read 180, while EL students at CELDT level 3 should be instructed using Pearson Language Central. The page did not specify ELD materials for EL students at CELDT levels 4 and 5.
- As for the provision of EL services to students in special education, in 2009-10, the District reported to OCR that there were 1,227 EL students receiving special education services primarily through the Resource Specialist Program (RSP) and the Special Day

⁶ Read 180 was developed for students functioning below grade level in English language arts beginning in the fourth grade. EL students in Read 180 used the "L Book," which was aligned with the State's 1999 ELD standards.

Class (SDC) program. The District told OCR and OCR confirmed through site visits, documents, and interviews that, under its special education program design, special education students, including those in the SDC program, were placed in general education classrooms for all or most of the school day with support from special education teachers and aides; under this model, special education students who were also English learners received their ELD instruction in the general education program to the same extent as their peers without disabilities. The District identified that special education students whose disabilities were so severe that they were in self contained classes all day received ELD instruction from their special education teacher and did not receive any specialized ELD program. The District did not provide any unique ELD services to special education students who were also English learners or develop any program or guidance for providing ELD instruction to students receiving special education services.

In January 2010, OCR met with a teacher on special assignment (Teacher) who had been overseeing the EL program since 2008-09 to obtain clarification on the District's design for providing ELD. The Teacher provided training to school sites on implementing services to EL students during 2009-10, and several staff referenced her training in their interviews with OCR. For lower elementary grade levels, the District adopted SRA as the ELD curriculum in 2005-06; she explained that the SRA curriculum addressed ELD standards that focused primarily on speaking skills, and that ELD standards that focused on the other language domains—listening, reading, and writing—were addressed through the ELA standards. The Teacher stated that SRA materials were not appropriate for upper elementary grade levels.⁷ The Teacher provided OCR with a diagram which was used in her training provided to school sites. It contained information that was different from the EL Master Plan and the Base Program. The diagram showed that EL students in grades K-2 would use SRA Language for Learning and SRA Language for Thinking, and students in grade 3 would use SRA Language for Writing; there was no discussion of students' CELDT levels. EL students in grades 4 and 5 would receive "structured academic expressive language" (also referred to as "analytical thinking"), which OCR learned was the District's term for general instruction that was focused on text structure and vocabulary and had no prescribed or associated curriculum, textbook, or materials. There was no ELD program specified for grade 6 in this diagram.

The District told OCR that it adopted the Read 180 program for the first time in 2009-10 for students in grades 4-8,⁸ who were unable to access their grade level ELA curriculum because they were two or more grade levels behind in reading and were performing at the lowest levels

⁷ The Teacher's statements were supported by information on the publisher's website in December 2009. The website stated that SRA Language for Learning was designed for students in pre-kindergarten through second grade, while SRA Language for Thinking was suitable for students in grades 1-3, and they both focused primarily on listening and speaking, rather than on reading and writing.

⁸ The District told OCR that the Read 180 program was available for students in grade 4-8, but not every school adhered to this directive. When OCR reviewed the District's list of students in this program for the 2009-10 school year, OCR found that El Camino ES and Mariposa EL had students in grades 1-3 in Read 180, while Sultana had students in grades 2-3 in Read 180, totaling 559 students in grades 1-3 who were in Read 180 at the three schools.

on the ELA portion of the CST test. The District described Read 180 as a reading replacement program, meaning students in these classes followed the Read 180 curriculum rather than the grade-level ELA curriculum. In 2009-10, out of 3,578 students enrolled in Read 180, 2,253 students (63%) were English learners with CELDT scores ranging from 1 to 5. Of the 2,253 EL students in this program, 1,486 (66%) were at the elementary school level and 767 (34%) were at the middle school level; 807 (36%) of the EL students in the Read 180 program had been attending a U.S. school for six or more years⁹. EL students in Read 180 received some amount of ELD instruction through the L Book, which was aligned to the 1999 State ELD standards.

As noted above, OCR visited five schools in 2009-10 and met with school administrators and teachers at each school and conducted classroom observations to learn about the school's implementation and delivery of EL services, as summarized below:

- Both Arroyo ES (K-6) and Vineyard STEM (K-7) provided about 30 minutes of daily ELD instruction to EL students in grades K-6. They used one or more of the SRA materials for grades 1-3, and “analytical thinking,” which had no associated ELD curriculum or materials, for grades 4-6. For grade 7 at Vineyard STEM, the school did not have designated ELD time or materials until OCR's onsite visit in January 2010, when the school started implementing 30 minutes of daily ELD instruction provided by the ELA teachers using Pearson Language Central¹⁰. At both schools, EL students enrolled in Read 180 received some amount of ELD instruction through the L Book. In 2009-10, 40 out of 267 EL students (15%) at Arroyo ES and 44 out of 342 EL students (13%) at Vineyard STEM were enrolled in Read 180. SDC students at Arroyo ES were grouped with general education students within their grade level throughout the day, with support from their special education teachers.

Based on interviews with numerous teachers at Arroyo ES and Vineyard STEM, several staff members' implementation of EL services was not consistent with the District's EL Master Plan and Base Program or the Teacher's training materials with respect to ELD instruction tailored to student English proficiency levels. Specifically, the interviews revealed that several staff relied upon subject matter curriculum, strategies, and testing to address student language acquisition (e.g., using CST rather than CELDT results to inform how they worked with students regarding language acquisition).

- Euclid ES¹¹ (K-6) rejected the SRA program as ineffective after using it for several years; the numerous teachers whom OCR interviewed described the SRA as focused too much on speaking abilities to the exclusion of other skills, and stated that SRA required no critical thinking or thought process on part of the students, and did not provide students with opportunities for “authentic practice.” After searching for other ELD materials,

⁹ Enrolled in a U.S. school prior to Aug. 1, 2003.

¹⁰ Pearson Language Central is a supplement to the grade level language arts text that addresses the ELD standards according to the publisher.

¹¹ In 2009-10, Euclid ES had the highest percentage of EL students in the District at 77% (489 out of 632 students).

Euclid ES started using ELD materials from another school district in the 2008-09 school year. An individual from that district came to the school to train them on using these materials. According to the teachers, they overwhelmingly preferred the other district's materials because they explicitly addressed all levels of English proficiency for all grade levels and all ELD standards, including reading and writing, and they reported seeing more student progress using those materials than with SRA.

Using the other district's materials, Euclid ES provided ELD instruction four times a week for all grade levels for 20-45 minutes each (depending on grade level). During ELD time, students were grouped within their grade level by their English proficiency as measured by their CELDT scores and teacher judgment. The school provided additional ELD support through the Rosetta Stone program for students in grades 3-6 at CELDT levels 1-2, and through the L Book for the 41 out of 481 EL students (9%) who were enrolled in Read 180.

- Neither Wiltsey MS (7-8) nor De Anza MS (7-8) had designated ELD classes. EL students enrolled in Read 180 received some amount of ELD instruction through the L Book, which applied to 91 out of 338 EL students (27%) at Wiltsey MS and 140 out of 312 students (45%) at De Anza MS. For all other EL students, ELD was supposed to be addressed in their ELA classes, but interviews with many teachers at Wiltsey MS and De Anza MS showed that this was not being done. At both Wiltsey MS and De Anza MS, SDC students were grouped with general education students for most, if not all, of the day.

With respect to providing EL students with access to the core curriculum, in 2009-10 and 2010-11, all teachers in the District had one of the state authorizations to instruct English learners. The District relied on teachers using Specifically Designed Academic Instruction for English (SDAIE) strategies to make the curriculum accessible to EL students. The District told OCR that it had worked with consultants to devise a five-day training on SDAIE strategies. Through interviews with teachers at the five schools OCR visited and through classroom observations, OCR confirmed that teachers were using SDAIE strategies in the classroom, such as small group instruction, partnering, visuals, and graphic organizers. However, as described more fully in section 1.F, a review of four sets of EL student achievement data for 2008-09 and 2009-10 school years—i.e., EL students' annual growth on the 2009 CELDT test; (2) EL students' enrollment in the Read 180 intervention program in 2009-10; (3) percentage of EL students who were retained at the end of 2008-09; and (4) percentage of students who were reclassified in 2009-10—showed that the use of these EL instructional strategies did not translate into results indicating that EL students' language barrier was being overcome or that they were being provided with parity of participation in the standard instructional program in a reasonable period of time.

As of 2014-15 and 2015-16, OCR found that the District was taking steps to address the noncompliance identified above. The District was in the process of dismantling the EL Master Plan and Base Program and developing a new EL framework. In August 2015, the Assistant

Superintendent and the Director described the changes the District was in the process of making with respect to the provision of ELD, which included training all school principals and teachers on the State's new 2012 ELD standards and providing every teacher in the District with a copy of the standards as well as plans to adopt a new ELA/ELD curriculum once the State issued the official list of instructional materials adoptions¹²; they stated that the new curriculum adoptions would address access to ELD for all EL students, including those with disabilities, and that the Director would be working with the special education department to address how EL students in special education will receive access to the core content. They also stated that the District no longer used the SRA materials and Read 180's L Book for ELD instruction because it found them ineffective. In March 2017, they told OCR that, in 2016-17, the District has adopted and implemented one of the 2015 State recommended ELA/ELD core curriculum, with plans to implement another State recommended curriculum starting in the 2017-18 school year to target middle school long-term EL students who are more than two years below grade level in reading.

Although the District was instituting changes, OCR, as of the 2014-15 and 2015-16 school year, noted the following:

- Based on program information provided by the District, all of its EL students were to be placed in a section of Academic Language Development (ALD). However, documentation provided by school sites in January 2015 showed that not all EL students were placed in a section of ALD at six middle schools. At Serrano MS, EL students at CELDT level 5 were not placed in a section of ALD. At Wiltsey MS, De Anza MS, Oaks MS, Vina Danks MS, and Vineyard (K-8), EL students who were in Read 180 were not placed in a section of ALD. These schools wrote that these students received their ELD instruction through the Read 180's L Book, even though District administrators told OCR that it was ineffective to use Read 180 for ELD instruction.
- The Director and Assistant Superintendent described to OCR a number of areas in which teachers needed additional training in order to provide effective ELD teaching, including further training on the 2012 State ELD standards, integrating ELD into core content instruction, developing language objectives for all classes, and delivering ELD and providing access to core content to EL students in special education.
- CDE data for the 2015-16 school year shows that a high proportion of EL students in grades 6 and higher have been unable to meet the reclassification criteria despite being enrolled in a U.S. school for six or more years. 92% of all EL students in grades 6 and higher (1,571 out of 1,709) in the District have been in EL status for six or more years.

In summary, based on the evidence gathered, OCR found that for the 2009-10 and 2010-11 school years the District failed to adopt and implement an English learner program for EL students with and without disabilities to address language deficiencies and ensure effective participation in the educational program offered by the District to non-EL students, including

¹² The State published the list of adoptions on November 4, 2015.

because the language assistance program failed to use materials or curriculum that addressed all four language domains —i.e., speaking, listening, reading, and writing --- for all EL students at every grade level and English proficiency level. For lower elementary grade levels, the SRA materials focused primarily on speaking skills and did not address the full range of English acquisition needs; one school (Euclid ES) was so dissatisfied with the SRA materials, it borrowed ELD materials from another school district, which it found to be more effective. For upper elementary grade levels, the District's analytical thinking program had no prescribed or associated curriculum, content, or materials, which meant that there was no consistency, accountability, or oversight of what was being taught during this time. At the middle school level, the only students who received some amount of ELD instruction were those enrolled in Read 180, which applied to 767 out of 2,033 (38%) EL students in grades 7-8 in the 2009-10 school year.

Moreover, while teachers in the District had one of the state authorizations to teach English learners and were observed using instructional strategies for EL students, interviews with teachers revealed training deficits, particularly with respect to using achievement, rather than language acquisition, testing information to inform their instruction. In addition, as discussed in section 1.C., the District acknowledged to OCR that its EL program for newcomer elementary school students was ineffective and was therefore dismantled in 2014-15.

Although the District is in the process of making modifications to its program, OCR found several deficiencies as of the 2014-15 and 2015-16 school year: 1) District schools were not consistently implementing its educational program for EL students; 2) many District teachers did not yet have sufficient training to implement the District's program; and 3) the District's EL program data showed that large numbers of students were not moving towards English proficiency and parity of participation in the standard instructional program.

C. Avoiding Unnecessary Segregation of EL Students

Legal Standards

The Title VI implementing regulation, at 34 C.F.R. §100.3(b)(1)(iii), provides that a school district may not, on the basis of national origin, subject a student to segregation or separate treatment in any matter related to the student's receipt of any service or benefit of the district's program. Under §100.3(b)(2), school districts may not utilize criteria or methods of administration that the effect of discriminating against students based on their national origin. Providing special services to English learners may have the effect of separating them from other students on the basis of their national origin. Separation of English learners is permissible to the extent necessary and appropriate to address the students' limited proficiency in English. However, school districts must implement their programs for English learners in the least restrictive environment consistent with achieving the program goals. Districts must have a legitimate educational justification for segregating English learners and must take steps to minimize the effects of any segregation.

Factual Findings, Analysis, and Conclusions of Law

From 2009-10 through 2015-16, outside of the District's newcomer program, the District did not have separate classes for EL students except for designated ELD classes, and EL students were placed in heterogeneous classes with non-EL students for most, if not all, of the school day.

With respect to the District's newcomer program, in 2009-10, it was located at two elementary schools--Arroyo and Montera--for EL students who have been in the country for less than one year and were at the first level of English proficiency. The goals of the newcomer program were to develop newcomer students' oral English language, to acculturate them to their new environment, and to develop their academic and social vocabulary; the primary focus of the newcomer program was providing students with ELD. OCR reviewed student schedules and confirmed that students did not exceed 12 months of enrollment in the newcomer program.

In 2014-15, the District eliminated the newcomer program at the elementary school level because, upon reviewing student achievement data, the District discovered that elementary school students in the newcomer program were performing less successfully than students who had opted out of the newcomer program. The District has continued its newcomer program for middle school students since 2010-11; the program is located at Vernon MS and serves about 20-25 students. The students in the newcomer program have four periods of core content, one period of physical education, and one period of ELD, every school day. They are integrated with students who are not in the newcomer program for all classes, except for ELD. For ELA and math, the students are clustered with a Spanish speaking teacher who received additional, targeted training on teaching newcomer students. For these classes, as well as other core content classes, students in the newcomer program receive push-in support from a newcomer teacher and aide. Students are allowed to stay in the newcomer program for a maximum of one year. After the one year period, students are exited from the newcomer program and are returned to their home school. Based on the foregoing information, OCR found the District in compliance with Title VI respect to this program component.

D. Monitoring the Progress of EL Students

Legal Standards

School districts must monitor the achievement of all of the EL students to ensure that they are making adequate progress while in the EL program.¹³ Districts must therefore validly, reliably and annually measure EL students' performance on the state English language proficiency assessment, and their performance in academic content areas. Monitoring systems should include benchmarks for expected growth. Districts should take appropriate steps to assist students who are not adequately progressing towards those goals.

Factual Findings, Analysis, and Conclusions of Law

¹³ Castaneda, 648 F.2d at 1013-14.

In 2009-10, the District told OCR that an important tool in monitoring student progress in acquiring English was the English Learner Teacher Observation Checklist (ELTOC). ELTOC was a District developed ELD standards-based observation form that was completed by teachers at the end of each trimester for each EL student to indicate which ELD standards have been mastered by the student. However, in a review of student files at the sites OCR visited an ELTOC was not completed for all EL students, especially at the middle schools. Moreover, based on school administrative and teaching staff interviews, OCR determined that, even when the ELTOC was completed, it was not typically utilized to track student progress or to lead supports or adjustments to students' EL services.

In addition to the ELTOC, the District, according to the EL Master Plan, expected students to improve one level on the CELDT annually. However, at each school OCR visited, OCR identified students who were not meeting this District goal. OCR identified 33 students at Arroyo ES, 54 students at Euclid ES, 51 students at Wiltsey MS, 44 at DeAnza MS, and 19 at Vineyard STEM who had been in the District for three or more years, and yet were still at the Beginning and Early Intermediate levels of English proficiency (CELDT 1-2); none of these students were identified as being eligible for special education placement for a majority of the school day or were identified for speech/language services that might impact their English language acquisition. According to District leadership staff, the schools reported they monitored student progress on CST math and language arts and District benchmark assessments, but did not focus on CELDT progress.

The District told OCR in August 2015 that it had eliminated the ELTOC because it found that the ELTOC was not an effective assessment. In February 2016, the District provided OCR with a new monitoring form called the "Long Term English Learner Monitoring Form." The one page form shows the EL student's most recent CELDT scores (overall and subscores), a three year history of the student's overall CELDT score, and the student's most recent score on a State approved reading inventory.

From 2009-10 through 2014-15, OCR found the District out of compliance with Title VI requirements for this program component due to its lack of consistent use of the ELTOC (or any another instrument) for its intended monitoring purpose and failure to address the significant number of students not making yearly progress on the CELDT. OCR found that, for the 2015-16 school year, the District had a process for monitoring the progress of EL students that was in compliance, as written, but OCR has identified a compliance deficiency because, as described in section 1.F, the District's high number and percentage of long-term EL students who did not meet the District's reclassification criteria despite being enrolled in a U.S. school for six or more years indicates that the District's system for monitoring their progress may not be effective.

E. Exiting EL Students from EL Programs and Services

Legal Standards

An EL student may not be exited from language assistance programs or status until the student demonstrates English proficiency. School districts must monitor the academic progress of former EL students to ensure that students have not been prematurely exited (reclassified); any academic deficits they incurred resulting from the EL program have been remedied; and they are meaningfully participating in the district's educational programs comparable to their peers who were never EL students.

Factual Findings, Analysis, and Conclusions of Law

The District's reclassification criteria in 2009-10 and 2010-11 were as follows: (1) an overall score of Early Advanced or Advanced (CELDT 4 or 5) on the CELDT, with no subscore below Early Advanced (CELDT 4); (2) Basic or above on the ELA portion of the CST during one of the last two consecutive years; (3) Early Advanced or Advanced (CELDT 4 or 5) on the most recent ELTOC; (4) teacher evaluation; and (5) parent approval. OCR reviewed student data which confirmed that students who met the criteria were reclassified and were not prematurely exited and that their academic performance subsequent to the reclassification was monitored. OCR confirmed that the District identified EL students who were eligible for reclassification once or twice a year. Staff at the school sites described the process and provided OCR with documentation to show that students who met the criteria were reclassified. Upon reclassification, schools monitored the performance of reclassified students in the same manner they monitored all students, by tracking CST scores and District benchmark assessment results. During the 2009-10 and 2010-11 school years, 783 (7%) and 1,034 (8.8%) of EL students were reclassified by the District.¹⁴ OCR found that the District's procedure for exiting EL students from the EL program was in compliance with Title VI during this period.

The District's data for 2014-15 and 2015-16 shows that the District has revised its reclassification criteria to make it consistent with the State criteria. The revised criteria are as follows: (1) an overall score of 4 or 5 on the CELDT, with no subscore below a 3; (2) a score of "3" or "C" for reading in English language arts on the Student Achievement Report; (3) a Lexile reading score at or above a specified level depending on the student's grade; (4) parent consultation; and (5) teacher recommendation. In February 2016, the District reported to OCR its efforts to regularly review student data and increase the number of EL students who could be reclassified, including meeting individually with all EL students in grades 6-8 to discuss their goals for reclassification and hiring two teachers to work directly with middle school students to improve their reading score. The District's rate of reclassification has increased in recent years, with the District's rate exceeding that of the County and the State in 2014-15 and 2015-16.¹⁵

¹⁴ See *Figure 2* for more details.

¹⁵ See *Figure 2* for more details.

OCR has determined that there is insufficient evidence of noncompliance with respect to this program component.

F. Evaluating the Effectiveness of EL Program

Legal Standards

Language assistance programs for EL students must provide for effective participation; they must be reasonably calculated to enable EL students to attain English proficiency and meaningful participation in the standard educational program comparable to non-English learners in a reasonable period of time. School districts must evaluate EL programs over time using accurate data to assess the educational performance of current and former EL students in a reliable way and must timely modify their programs when needed.

Factual Findings, Analysis, and Conclusions of Law

The EL Master Plan identified two ways to evaluate EL program effectiveness. The first was through the Annual Measurable Achievement Objectives (AMAOs) under Title III of the No Child Left Behind Act of 2001; three AMAO performance objectives --AMAO 1, AMAO 2, and AMAO 3-- measure the percent of ELs making annual progress in learning English, the percent of ELs attaining English language proficiency, and the percent of ELs who are proficient on CST, respectively. The second way was through the District Student Achievement Review Process (SARP), where students were determined to be at Mastery, Progress toward Mastery, or At-Risk. Students in the latter two categories were supposed to be provided with classroom interventions and extended learning opportunities outside the regular school day.

In addition, according to a diagram entitled "Accountability for Systemic Change" contained in the EL Master Plan, the District was required to produce two reports: (1) an Annual English Learner Evaluation Report to be submitted to the school board, CDE, and OCR, and (2) regular data analysis that discussed program monitoring, interventions for EL students, and program adjustments.

From 2009-10 through 2015-16, the District failed to provide any documentation that it had prepared the EL program reports that were identified in the diagram. Throughout the investigation, OCR made multiple requests for all EL program evaluation documents. In response, the District typically produced the AMAO results and District benchmark assessment results for language arts and math for each school; the District also provided the results of the State mandated self-assessment for the EL subgroup for the 2012-13 school year that was largely focused on AMAO and CST results.

The District's responses to OCR's requests did not meet the District's obligation under Title VI to conduct an EL program evaluation for several reasons. Regarding AMAO results, OCR notes that a district could be meeting its AMAO targets but still have large numbers of EL students not making progress in acquiring English or reaching proficiency within a reasonable period of time.

In this regard, the District's target for AMAO 1 in 2008-09 was that 51.6% of EL students would meet the annual proficiency growth target. The District met this target because 53.4% of students met the target. However, this left 47% of the students who did not make progress, and this group was not addressed through the AMAOs. In addition, several school sites did not meet the AMAO targets. Similarly, focusing on District benchmark assessment results was useful for identifying students who needed intervention, but not for evaluating the effectiveness of the EL program. Overall, the reports provided by the District did not compare the scores of EL students to non-EL students; contained data from a single point in time so it was not possible to establish a baseline for EL students and track their growth or lack of growth; and contained no analysis of whether EL students were meeting the District's program goals, any steps the District was taking to address failure to meet its goals; and recommendations for program modifications as needed.

OCR separately looked at five measures of student achievement to assess whether EL students were meeting the District's stated goals and whether the District's EL program was reasonably calculated to enable EL students to attain English proficiency and meaningful participation in the standard educational program in a reasonable amount of time.

First, OCR reviewed the District's comparison of CELDT results for two years (2008 and 2009), specifically assessing the percentage of students who grew by at least one level, stayed the same, or decreased on the 2009 CELDT test from the prior year. The evidence showed that 32% of the EL students failed to grow by one level from CELDT level 1 to 2 and 39% failed to grow one level from CELDT level 2 to 3; the EL Master Plan stated that all of the students in these two groups were expected to grow a level. Another notable concern that emerged was the 45% of Advanced level students who went down one or more levels on the 2009 test compared to the 2008 test.

Second, OCR looked at the students who were enrolled in Read 180. OCR computed that, in 2009-10, 63% (2,253 out of 3,578) of the students in Read 180 were English learners, even though English learners made up 49% of the District student population, and more than a third (36% or 807 out of 2,253) of the English learners in the Read 180 program had been attending a US school for six or more years. At the two middle schools OCR visited, 84% (231 out of 274) of the students in Read 180 were English learners, and 81% (188 out of 231) of the English learners in the Read 180 program had been attending a U.S. school for six or more years. The high proportion of EL students who required a reading replacement program geared for the lowest reading students indicated an ineffective ELD program and a lack of parity of participation in the standard instructional program.

Third, OCR looked at the students who were retained at the end of the 2008-09 school year. The District retained 55 students, of whom 40 were English learners; in other words, 73% of the students who were retained were English learners. At Euclid ES, all eight students who were retained were English learners. Based on OCR interviews with District administrators and a review of its documentation, OCR determined that the District did not monitor the number of EL students who were retained.

Fourth, OCR looked at the District's annual number and rate of reclassification compared to that of the County and State from 2009-10 through 2015-16.

Figure 2: The District's Annual Rate of Reclassification Compared to the County and State

Year	District's Number of Reclassified Students	District's Rate of Reclassification	County's Rate of Reclassification	State's Rate of Reclassification
2009-10	783	7.0%	9.9%	11.6%
2010-11	1,034	8.8%	10.5%	11.4%
2011-12	1,118	10.7%	10.4%	12.0%
2012-13	1,059	10.5%	11.4%	12.2%
2013-14	1,068	10.0%	11.7%	12.0%
2014-15	2,355	22.3%	12.1%	11.0%
2015-16	1,508	16.8%	11.1%	11.2%

As shown above in *Figure 2*, the District's rate of reclassification was lower than the rate for the County and the State for the first five years under review. The District's rate exceeded that of the County and the State in the last two years.

Lastly, OCR reviewed publicly available data on the CDE website for the 2015-16 school year. The CDE reported the number of EL students in grades 6 and higher who have been in EL status for 6 or more years. For the District as a whole, 92% (1,571 out of 1,709) of EL students in grades 6 and higher have been in EL status for six or more years. The CDE data showed that for six schools—Buena Vista Arts, Corona ES, Edison ES, Monte Visa ES, Ramona ES, and Vista Grande ES--100% (73 students) of their EL students in grades 6 and higher have been in EL status for six or more years.

For the reasons discussed herein, OCR has identified a deficiency from 2009-10 through 2015-16 with respect to the manner in which the District has conducted its program evaluation in order to determine its effectiveness and make modifications to its EL program as needed.

Issue 2: Whether the District has referred, evaluated and placed EL students in special education programs in a nondiscriminatory manner.

Legal Standards

The Section 504 regulation, at 34 C.F.R. §104.35(a), requires school districts to conduct an evaluation of any student who needs or is believed to need special education or related aids and services because of disability before taking any action with respect to the student's initial placement and any subsequent significant change in placement. EL students who may have a disability, like all other students who may have a disability, must be located, identified, and evaluated for special education and disability-related services in a timely manner.

The Section 504 regulation, at 34 C.F.R. §104.35(b), state that tests and other evaluation materials must be valid for the specific purpose for which they are used and must be administered by trained personnel in conformance with the instructions provided by their producer. The May 25th memorandum provides that pursuant to Title VI school districts may not assign national origin minority group students to special education programs on the basis of criteria which essentially measure or evaluate English language skills. Therefore, districts must employ standards and procedures for the evaluation and placement of English Learner students in special education that reliably identify students' educational disabilities, rather than the students' lack of English proficiency. As such, when administering evaluations to determine whether an EL student has a disability under Section 504, school districts must administer such evaluations in an appropriate language to avoid misclassification. 34 C.F.R. pt. 104, App. A at number 25.

34 C.F.R. § 104.35(c) requires that, in interpreting evaluation data and in making placement decisions (i.e., decisions about whether any special services will be provided to the student and, if so, what those services are), school districts must draw information from a variety of sources, including cultural background, which OCR interprets to include linguistic background. EL students with disabilities must be provided both the language assistance and disability-related services to which they are entitled under Federal law.

Factual Findings, Analysis, and Conclusions of Law

A. Pre-referral and referral of EL students for special education

A review of the District's special education and SST manuals in effect for 2009-10 and interviews with staff at the five schools OCR visited described a potentially lengthy and duplicative process before a student could be assessed for special education. When students experienced difficulties, they were first referred to the school's Coordination of Services Team (COST), which identified the concern and specified actions or steps to be taken in response. At subsequent COST meetings, the team reviewed whether the actions had been taken and whether further action was needed to address the identified concern. If students were still struggling, the COST team referred them to the Student Success Team (SST) which developed a plan and held follow up meetings to modify the plan as needed. If the SST plan continued to be unsuccessful, depending on the school, the SST team referred students for a special education evaluation or referred them to the School Appraisal Team (SAT) for consideration for a special education assessment. Once referred to the SAT team, the SAT team could prescribe additional interventions or refer the student for a special education evaluation. The students' lack of progress on the CELDT or ELTOC was not a trigger for selecting or identifying students as "struggling" and for possible referral to the COST team.

OCR reviewed a set of files at the five schools and found that because schools had multiple teams that considered students having difficulties, it could take many months or years for all the teams to consider the student and ultimately refer the student for a special education evaluation. This was true even though, most of the time, the various teams at each school were composed

of the same or overlapping members. For example, an EL student at Arroyo ES had an SST meeting in November 2009 as a fourth grader. The November 2009 SST notes showed the following: She had her first SST meeting as a first grader in October 2006. Since then, she was diagnosed with hearing problems and provided various classroom interventions and tutoring, without success. In third grade, she was enrolled in a reading replacement program called Language!, and in fourth grade, she was in Read 180, another reading replacement program; her CELDT scores had declined since first grade. The November 2009 SST team decided the following: Refer her yet another team, the SAT team, for interventions in ELA and math; get progress reports from the Read 180 teacher, and get another hearing test. She had been in the SST process for over three years without an evaluation for special education services, even though she was not making progress. The November 2009 SST team's response was to refer her to the SAT team, a potential for another delay, who could either choose to refer her for an evaluation or choose to continue with school interventions.

The District updated its special education manual in 2014-15. The updated manual provides for the same process as described in 2009-10, consisting of the COST, SST, and SAT teams, for referring a student for a special education evaluation. The schools' responses to OCR in 2014-15 show that they still have the same pre-referral teams described above.

OCR has identified a deficiency from 2009-10 through 2015-16 based on the program description specifying multiple process prior to evaluation and the identified practice of requiring multiple, serial team meetings prior to a special education evaluation, along with the number of instances where the case files reviewed in the earlier years documented that students were not evaluated for special education services within a reasonable amount of time.

B. Evaluation of EL students for special education

In the 2009-10 school year, the District had written guidelines for assessing EL students with suspected disabilities or disabilities, which required bilingual school psychologists to:

- (1) conduct all initial and triennial evaluations of EL students in grades K-3 with CELDT levels 1-3; and
- (2) conduct collaborative assessments with monolingual school psychologists for both initial and triennial evaluations for: (a) K-3 students with CELDT levels 4-5 who have negligible Spanish skills on the assessment instrument and have had only English instruction; (b) for initial evaluations of grades 4-8 students with any CELDT level who have negligible Spanish skills on the assessment instrument and have had only English instruction; and (c) for triennial evaluations of grades 4-8 students with CELDT levels 1-2 who have negligible Spanish skills on the assessment instrument and have had only English instruction.

In 2009-10, the District had fifteen school psychologists who were assigned to specific schools. Ten of the school psychologists were bilingual in English and Spanish, and there were two bilingual aides to support the monolingual psychologists who were trained to conduct bilingual

academic testing. OCR interviewed all District school psychologists and heard consistent testimony that they took into account EL students' English proficiency and language background in conducting the evaluation, including reviewing a student's CELDT subscores to analyze the meaning of differences between them, looking at whether the student has grown on the CELDT over time, and verifying that the student has received ELD instruction. The bilingual psychologist interviewed parents and considered cultural and linguistic differences. A monolingual and bilingual psychologist often collaborated on the evaluation and discussed whether there was evidence of disability through information obtained in Spanish and English.

The District also had 20 language/speech therapists (LSH), four of whom were bilingual in Spanish and English; in addition, three out of the four LSH aids who administered assessments under the supervision of the LSH specialists were also bilingual. OCR interviewed all District LSH specialists; they discussed how they differentiated between a student with a potential speech disability and a student who was simply still acquiring English in their assessment process. The LSH specialists had assessment instruments in both English and Spanish, and monolingual specialists worked with the bilingual aides to administer assessments in both languages. All students at the Beginning and Early Intermediate (CELDT 1 and 2) proficiency levels, as well as most students at the Intermediate (CELDT 3) level, were given assessments in both languages. For very young children, such as kindergarteners, they would use instruments in both languages for I-FEP students.

OCR reviewed the psychoeducational and speech and language assessment reports in the special education files of students who attended each of the five schools OCR visited, and confirmed that the assessments had been carried out in accordance with the District procedures for bilingual assessments. OCR consistently found that EL students at the Beginning through Intermediate levels of English proficiency were evaluated in both English and Spanish.

In 2014-15, the District had 21 school psychologists, twelve of whom were bilingual in Spanish, and 32 LSH specialists, six of whom were bilingual in Spanish. The updated special education manual described which EL students were to receive a bilingual psychoeducational evaluation, as follow:

- All initial evaluations of English learners at all CELDT levels will be conducted collaboratively by a Spanish bilingual and English monolingual psychologist. This is also specified for the triennial evaluations of EL students in grades K-3; and
- The triennial evaluations of EL students at all CELDT levels who have received English only instruction since kindergarten will be assessed by an English monolingual psychologist.

Based on this information, OCR concluded that there was insufficient evidence of noncompliance with Title VI and Section 504/Title II with respect to this program component from 2009-10 through 2015-16.

Overall Conclusion

The District entered into the enclosed Agreement, when fully implemented, is intended to address the violations and deficiencies identified in this compliance review. OCR will monitor the implementation of the Agreement until the District is in compliance with the statute(s) and regulations which were at issue in the case.

This concludes OCR's investigation of this compliance review and should not be interpreted to address the District's compliance with any other regulatory provision or to address any issues other than those addressed in this letter. OCR is closing the investigation of this compliance review as of the date of this letter.

This letter sets forth OCR's determination in a compliance review. This letter is not a formal statement of OCR policy and should not be relied upon, cited, or construed as such. OCR's formal policy statements are approved by a duly authorized OCR official and made available to the public.

Please be advised that the District may not harass, coerce, intimidate, retaliate, or discriminate against any individual because he or she has filed a complaint or participated in the complaint resolution process. If this happens, the individual may file another complaint alleging such treatment.

Under the Freedom of Information Act, it may be necessary to release this document and related correspondence and records upon request. In the event that OCR receives such a request, we will seek to protect, to the extent provided by law, personally identifiable information, which, if released, could reasonably be expected to constitute an unwarranted invasion of personal privacy.

OCR wishes to thank the District, and in particular, Ms. Tammy Lipschultz, Assistant Superintendent of Learning and Teaching, and Ms. Lizette Diaz, Director of Curriculum & Instruction for English Language Development, for their assistance in resolving this compliance review. If you have any questions regarding this letter or the investigation, please contact Jenny Moon, civil rights attorney, at (415) 486-5538.

Sincerely,

/s/

Laura Faer

Regional Director

Enc.

Cc: Tammy Lipschultz, Assistant Superintendent of Learning & Teaching (email)
Lizette Diaz, Director, Curriculum & Instruction of English Language Development (email)