

Illinois State Board of Education (ISBE)

May 23-25, 2005

Scope of Review: A team from the U.S. Department of Education's (USDE's) Office of English Language Acquisition, State Consolidated Grant Division conducted an on-site review of the Illinois State Board of Education (ISBE) and Chicago Public Schools (CPS) from May 23-May 25, 2005. This was a comprehensive review of ISBE's administration of Title III, Part A of the No Child Left Behind Act (NCLB).

In conducting this comprehensive review, the USDE team carried out a number of major activities. In its review of the Title III, Part A program, the USDE team reviewed the seven elements addressed in the Title III monitoring guide. The review included analysis of implementation of English language proficiency standards, assessment, and accountability requirements, a review of State activities under Title III, and other essential components of the Title III State Formula Grant Program. During the on-site review, the USDE team visited the district office of Chicago Public Schools (CPS), along with the George B. Armstrong School of International Studies (an Elementary School), and interviewed administrative staff, teaching staff, and parents.

Illinois State Board of Education participants: Robin Lisboa (Administrator, Division of English Language Learning (DELL)), Gail Lieberman (Special Assistant to the State Superintendent for NCLB), Dr. Ginger Reynolds (Interim Assistant Superintendent for Teaching and Learning), (Principal Consultants, DELL): Dr. Boon Lee, Seng Naolhu, Naomi Green, Sherry Johnson, Carolina Mata-Woodruff, Beth Robinson, William Garcia; Mary Morrison (Principal Consultant, Funding and Disbursements), Kim Lewis (Principal Consultant, Funding and Disbursements), Myron Mason (Federal Grants and Programs), Dave McDermott (Division Administrator, Budget and Fiscal Management), Robert Wolfe (Administrator, External Assurance), Becky McCabe (Administrator, Student Assessment), Dr. Connie Wise (Administrator, Data Analysis), Dr. Lilibeth Gumia (Principal Consultant, Data Analysis), Data Donna Luallen (Administrator, Accountability), Dr. Andy Metcalf (Principal Consultant, Data Analysis), Dr. Shange Shen (Principal Consultant, Data Analysis), Dennis Goedecke (Principal Consultant, Student Assessment), Dr. Else Hamayan (Director, Illinois Resource Center), Jolene Reddy (Principal Consultant, Certification), Robert Wolfe (Administrator, External Assurances)

USDE Participants: Dr. John Ovard (Director, Division of Innovation and Improvement), Dr. Millie Bentley-Memon (Senior Education Program Specialist), Margarita Ackley (Education Program Specialist)

Previous Monitoring Findings: None. This is the first Title III on-site monitoring review for the Illinois State Board of Education.

Summary of Title III, Part A Monitoring Indicators

Title III, Part A: Submission Indicators			
Element Number	Critical element	Status	Page
Element 1.1	State submissions: Follow-up on areas identified through desk audit and document reviews.	Reviewed: No Further Action Required at This Time	6
Title III, Part A: Fiduciary Indicators			
Element 2.3	Reservation of funds: The SEA has a system in place that enables it to account for: (1) funds reserved for State administration, (2) funds reserved to provide technical assistance and other State level activities (3) the reservation of funds for immigrant activities, and (4) funds that become available for reallocation.	Finding: Further Action Required	6-7
Element 2.4	Supplement not supplant: The SEA ensures that Title III funds are used only to supplement or increase non-Federal sources used for the education of participating children and not to supplant funds from non-Federal sources.	Reviewed: No Further Action Required at This Time	7
Element 2.5	Equipment and real property: The SEA ensures that equipment is procured at a reasonable cost, and is necessary for the performance of the Federal award. Title III funds cannot be used to acquire real property.	Reviewed: No Further Action Required at This Time	7

Title III, Part A: ELP Standards, Assessments and Accountability Indicators

Element Number	Critical element	Status	Page
Element 3.1	English language proficiency standards: State English language proficiency standards have been developed, adopted, disseminated, and implemented.	Reviewed: No Further Action Required at This Time	7-8
Element 3.2	English language proficiency (ELP) assessments: ELP assessments have been administered to all LEP students in the State in grades K-12. Accountability has been implemented through data collection.	Reviewed: No Further Action Required at This Time	8
Element 3.3	Data collection: The State has established and implemented clear criteria for the administration, scoring, analysis, and reporting components of its ELP assessments, and has a system for monitoring and improving the on-going quality of its ELP assessment system.	Commendation, Reviewed: No Further Action Required at This Time	8-9
Element 3.4	New English language proficiency assessment: Transition to new ELP assessment or revising the current State ELP assessment.	Reviewed: No Further Action Required at This Time	9
Element 3.5	Annual measurable achievement objectives (AMAOs): AMAOs have been developed and AMAO determinations have been made for Title III-served LEAs.	Reviewed: No Further Action Required at This Time	9-10
Element 3.6	Data system in place to meet all Title III data requirements including capacity to follow Title III served students for two years after exiting; State approach to follow ELP progress and attainment over time using a cohort model.	Reviewed: No Further Action Required at This Time	10

Title III, Part A: State Level Activities; LEA Authorized and Required Activities, Immigrant Children and Youth Indicators

Element Number	Description	Status	Page
Element 4.1	<p>State level activities: Using funds reserved for State-level activities, the State carries out one or more activities that may include:</p> <ul style="list-style-type: none"> • Professional development • Planning, evaluation, administration and interagency coordination • Promoting parental and community participation • Providing recognition. 	Reviewed: No Further Action Required at This Time	10
Element 4.2	<p>Required subgrantee activities: The LEA/Subgrantee is responsible to increase the English proficiency of LEP students by providing high quality language instructional programs and to provide high-quality professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instructional programs), principals, administrators, and other school or CBO personnel.</p>	Reviewed: No Further Action Required at This Time	10-11
Element 4.3	<p>Authorized subgrantee activities: The LEA may use the funds by undertaking one or more authorized activities.</p>	Reviewed: No Further Action Required at This Time	11
Element 4.4	<p>Activities by agencies experiencing substantial increases in immigrant children and youth: The subgrantee receiving funds under Section 3114(d)(1) shall use the funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth</p>	Reviewed: No Further Action Required at This Time	11

Title III, Part A: State Review of Local Plans			
Element Number	Critical element	Status	Page
Element 5.1	The SEA ensures that its LEAs comply with the provision for submitting an annual application to the SEA (Section 3116 (a)).	Reviewed: No Further Action Required at This Time	11
Element 5.2	Private school participation: LEAs are complying with NCLB requirements regarding participation of LEP students and teachers in private schools under Title III.	Reviewed: No Further Action Required at This Time	12
Element 5.3	Teacher English fluency: Certification of teacher fluency requirement in English and any other language used for instruction (Section 3116(c)).	Reviewed: No Further Action Required at This Time	12
Title III, Part A: State Monitoring of Subgrantees			
Element 6.1	Monitoring: The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title III program requirements.	Finding: Further Action Required	12-13
Element 6.2	Consortia: Any governance issues in the State; policy of fiscal agents.	Reviewed: No Further Action Required at This Time	13
Title III, Part A: Parental Notification			
Element 7.1	Parental notification: Provisions for identification and placement and for not meeting the AMAOs; notification in an understandable format (Section 3302).	Commendation, Reviewed: No Further Action at This Time	13

**Title III, Part A
State Submission Indicators**

Element 1.1- State Submissions

Reviewed: The Illinois State Board of Education (ISBE) has submitted all reports required under Title III, Part A, and the Consolidated State Application to the U.S. Department of Education (USDE). While on-site, the USDE team posed several follow up questions from the January 31, 2005 Consolidated State Performance Report to the ISBE, and all questions were addressed. This information has been recorded in Illinois's official file at the USDE.

Citation: Section 3123, 34 CFR 80.40

**Title III, Part A
Fiduciary Indicators**

Element 2.3 – Reservation of Funds

Finding: The State was unable to fully report how it was using Title III funds for State-level activities, including funds for personnel for 2004-05. The State had a large carryover balance from 2003-04, and indicated that it was still in the process of deciding how to use funds for State-level activities. After the site visit, the State provided USDE with an itemized budget for years 2003-2005, but the Title III administration section of this budget was not sufficiently detailed to determine State Educational Agency (SEA) expenditures under this section.

Citation: Sections 3111 and 3114

Further action required: The Illinois State Board of Education must 1) establish a budget for all Title III expenditures for 2004-05, 2) establish a budget for carryover funds from prior fiscal years, and 3) establish a plan for monitoring the use of fiscal expenditures used for State-level activities. All of this information must be submitted to the Department.

Reviewed: The total Title III grant award to Illinois for FY 2004 was \$25,929,181. The State reserved \$3,889,337 for the immigrant children and youth program, and \$20,743,345 for the State formula grant program. The State reported that \$1,296,459 (5% of total award) was reserved for SEA funds. Within this amount, \$518,584 was reserved for SEA activities, and \$777,875 was reserved for SEA administrative funds.

Reviewed (Chicago Public Schools)(CPS): CPS received 48% of the total grant award to Local Educational Agencies (LEAs) for the Title III State Formula program (\$9,956,806). The district did not receive funds under the immigrant children and youth program in

2004-05 as it did not have a significant increase in immigrant students over the two preceding years.

Element 2.4 – Supplement not Supplant

Reviewed: Illinois State Board of Education (ISBE) Division of English Language Learning (DELL) consultants conduct a multi-party review of local educational agency (LEA) local plans and proposed budgets to ensure that funds are used to supplement, not supplant LEA activities. In addition, ISBE requires an LEA to have an approved application for State (LIP/LEP) funds before being eligible to receive Federal funds under Title III.

Citation: Section 3115(g)

Element 2.5 – Equipment and Real Property

Reviewed: IL provided the USDE team with documentation regarding how the State ensures that it is following State and Federal requirements regarding purchase and disposition of equipment. Title III funds cannot be used to acquire real property.

Reviewed (Chicago Public Schools)(CPS): CPS staff described the district process for reviewing and approving requests for equipment, conducting inventories of equipment, and disposing of equipment.

Citation: OMB A-87; 34 CFR 76.533, 34 CFR 80.32

Title III, Part A English Language Proficiency (ELP) Standards, Assessments, and Accountability Indicators

Element 3.1 – English Language Proficiency (ELP) Standards

Reviewed: IL is an active member of the World-class Instructional Design and Assessment (WIDA) consortia, and has implemented the WIDA standards Statewide. Each of the five sets of WIDA English language proficiency standards addresses a specific context for language acquisition (social and instructional settings, language arts, math, science, and social studies) and includes the domains of speaking, listening, reading, and writing. The standards are divided into four grade level clusters (K-2, 3-5, 6-8, 9-12) (English Language Proficiency Standards for English Language Learners in Kindergarten through Grade 12: Frameworks for Large Scale State and Classroom Assessment, February 2004).

The State has conducted numerous trainings to LEA and school personnel throughout the State, often in collaboration with the Illinois Resource Center, to explain how to use the standards. IL has formed a committee to discuss how curriculum and instruction can be updated to be aligned with WIDA standards.

Reviewed (Chicago Public Schools)(CPS): CPS developed its own English language proficiency standards and benchmarks prior to establishment of the WIDA standards. The district is in the process of evaluating standards implementation at the school level. CPS has developed sample lessons in the content areas tied to the WIDA standards, specifically for Algebra I and II, World Studies, and other areas, for use in teaching English language learners. These sample lessons reflect the CPS standards and State (WIDA) standards.

Citation: Section 3113(b)(2)

Element 3.2 – English Language Proficiency (ELP) Assessments

Reviewed: The IL State Administrative Code requires that all students identified as having a non-English background via a home language survey be assessed for English language proficiency. According to State law, this assessment must take place within four weeks of the student's enrollment in the school district, and must include four domains of language (speaking, listening, reading, and writing). Currently, LEAs must administer one of four State-approved ELP assessments: IPT 1 & 2, Pre-LAS & LAS, LPTS, or MAC II. LEAs will continue to use these assessments until the new ACCESS is fully administered in 2005-06. A screener test will also be developed and implemented for the ACCESS for use in 2005. The State has also worked with the Center for Applied Linguistics (CAL) to develop and deliver on-line training for ACCESS administration. The State reported that it is conducting training to ensure that all LEAs, with/without LEP students, have individuals trained to administer the ACCESS.

The USDE team reviewed draft technical materials for the ACCESS. These materials appeared to be of high technical quality, and also addressed accommodations for LEP students with disabilities.

Citation: Section 3113(b)(3)(D)

Element 3.3 – Data Collection (Reporting components of ELP assessments)

Commendation: The Illinois State Board of Education's (ISBE's) Data Analysis Division has demonstrated its commitment to meeting NCLB Title III data requirements through its close collaboration with the ISBE's Assessment Division and Division of English Language Learning. The Data Analysis Division demonstrated attention to detail in ensuring data quality and producing accurate reports, even when documents had to be revised several times to ensure accuracy.

Reviewed: ISBE's Data Analysis Division described how it reviews English language proficiency (ELP) assessment data and contacts LEAs regarding any discrepancies. The State also described how it is further enhancing its data collection system. The Division also provided evidence that it has piloted a new student information system (IWAS SIS), which it plans to fully implement in 2005-06. Under this system, all students Statewide will be assigned a unique SIS number. The State is embarking on Statewide trainings regarding usage of this system.

The State also provided evidence to indicate that the State ELP assessments are administered Statewide using uniform and standardized procedures.

Reviewed (Chicago Public Schools)(CPS): CPS described how it monitors the English language proficiency progress of limited English proficient (LEP) students and forwards data to ISBE for annual measurable achievement objective (AMAO) determinations.

Citation: Section 1111(b)(7); Section 3113(b)(3)(D)

Element 3.4 – Transition to New English Language Proficiency (ELP) Assessment

Reviewed: Illinois described how it plans to transition from current commercial English language proficiency (ELP) assessments to a new standards-aligned ELP assessment, the ACCESS, in 2005-06. The State is implementing Statewide training for administration of the new assessment.

The World-class Instructional Design and Assessment (WIDA) consortium is conducting a bridge study to compare ELP assessment results across four ELP assessments: the IPT, LAS, LPTS, and MAC II. The State provided a list of LEAs in the State that participated in the bridge study.

The State indicated that it anticipates it will develop new AMAO targets, for review by the Department, upon full implementation of the WIDA standards and the ACCESS.

Citation: Section 1111(b)(7); Section 3113(b)(3)(D)

Element 3.5 – Annual Measurable Achievement Objectives (AMAOs)

Reviewed: Illinois made annual measurable achievement objective (AMAO) determinations in January 2005, and issued letters to Title III-served districts informing them of their AMAO progress. During the on-site review, however, the State reported that it had issued a second revised set of determinations in March 2005 due to a programming glitch, which resulted in incorrect AMAO determinations for some (10-12) LEAs. The State was considering whether to make a third revised set of determinations due to lack of vertical alignment of some ELP assessments. As reported in the Jan. 31, 2005 Consolidated State Performance Report, of 141 subgrantees in 2003-04, 89 met AMAOs, and 52 did not meet AMAOs. If the State elects to make a third revised set of

determinations, 101 LEAs would be counted as meeting AMAOs, and 40 would be counted as not meeting AMAOs.

During the on-site meeting in Springfield, the State described its processes for including LEAs in consortia in Title III AMAOs, and for operationalizing the “making AYP” portion of the Title III AMAOs. The State reported that an LEA was given a “pass” on the AYP portion of the Title III AMAOs if it did not have a sufficient number of LEP students to meet the minimum subgroup size required under Title I.

Citation: Section 3122(a)(3)(A)(i-iii)

Element 3.6 – Data Collection (Data collection system)

Reviewed: IL affirmed its capability to aggregate and disaggregate data according to Title III requirements. The State explained how it has a system in place to track the content achievement of former Title-III served LEP students after their exit from Title III services. The State provided a copy of a PowerPoint presentation used during training for LEAs to inform them of requirements for data collection under Title III (“Title III-Information for Data Collection and for Completing Grant Reports.”)

Citation: Section 3121(a)(4); Performance Indicator 2.1 of the Consolidated State Plan

Title III, Part A

State Level Activities; LEA Authorized and Required Activities; Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth

Element 4.1 – State Level Activities

Reviewed: The USDE team and Illinois State Board of Education (ISBE) staff conducted a conference call with Else Hamayan of the Illinois Resource Center (IRC) to learn the details of how the ISBE works with the IRC to provide professional development and technical assistance to districts and schools on topics such as the new World-class Instructional Design and Assessment (WIDA) standards. ISBE staff indicated that the IRC will collaborate with them to develop LEA improvement plans in the coming year for Title III-served LEAs that fail to meet Title III AMAOs for two consecutive years.

Citation: Section 3111(b)(2)

Element 4.2 – Required Subgrantee Activities

Reviewed: The Illinois State Board of Education (ISBE) described its process for reviewing local educational agency (LEA) local plans through the State Consolidated Application for Illinois State Transitional Bilingual Education and Title III programs.

LEAs are also required to report to ISBE on activities in their annual performance report to the State. The ISBE uses these review and reporting processes to ensure that subgrantees are implementing required activities.

Reviewed: Chicago Public Schools (CPS): CPS described how schools use Title III funds to provide services to LEP students, including purchasing textbooks and curriculum materials and after-school tutoring.

Citation: Section 3115(c)

Element 4.3 – Authorized Subgrantee Activities

Reviewed: A copy of Chicago Public Schools' local plan was provided to the monitoring team. The on-site team observed the implementation of subgrantee activities firsthand in the district office, and at George B. Armstrong School.

Citation: Section 3115(d)

Element 4.4 – Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth

Reviewed: The Illinois State Board of Education (ISBE) described how it reviews local plans for activities under the immigrant children and youth program through the State Consolidated Application for Illinois State Transitional Bilingual Education and Title III programs.

Citation: 3114(d)(1)

Title III, Part A State Review of Local Plans

Element 5.1 – State Review of Local Plans

Reviewed: ISBE Division of English Language Learning (DELL) staff reviewed the 2004-05 Consolidated Application for Illinois State Transitional Bilingual Education and Title III programs with the USDE team. The Application provides critical information on LEA procedures for obtaining Title III funds. Applicants are required to provide information regarding planned professional development activities, proposed activities, LEP student counts, teacher qualifications, proposed budgets, proposed/parent involvement/outreach activities, district administered ELP assessments, and other areas.

Citation: Section 3116(a)

Element 5.2 – Private School Participation

Reviewed: Through interviews, Division of English Language Learning (DELL) staff described how they work with local educational agencies (LEAs) and private school officials to ensure that eligible limited English proficient (LEP) students in private schools are appropriately served under Title III. The State has an on-line non-public school directory and enrollment statistics file that provides both directory and enrollment information for non-public schools for school years 02-03 and 03-04.

Reviewed: Chicago Public Schools (CPS): CPS staff described how they inform non-public schools within the district regarding the opportunity to participate in Title III, and consult with non-public school officials regarding the provision of programs and services. CPS staff described the positive working relationship with non-public schools and their liaisons. The district reported that it had 1127 LEP students in Catholic non-public schools eligible for Title III funds during the 2004-05 school year.

Citation: Sections 9501-9506

Element 5.3 – Teacher English Fluency

Reviewed: The State reported that in Illinois, the Illinois Certification Testing System is used to certify native language proficiency. Foreign-born teacher candidates must take an English Language Proficiency Test, administered through this system, unless they hold a degree issued from an American institution of higher education. The Illinois State Board of Education (ISBE) provided evidence of its Online Teacher Information System (OTIS), through which information regarding Illinois teachers' credentials are communicated to the public. The OTIS system provides information regarding a teacher's endorsement (ESL and/or bilingual).

Citation: Section 3116(c)

Title III, Part A State Monitoring of Subgrantees

Element 6.1 – State Monitoring of Subgrantees

Finding: During the review, the Division of English Language Learning (DELL) indicated that, due to a shortage of staff, it has not yet enacted a comprehensive on-site monitoring plan for Title III-served local educational agencies (LEAs). The Illinois State Board of Education must develop and implement a plan for conducting monitoring of Title III-served LEAs. This monitoring should include monitoring of English language proficiency (ELP) assessment administration and monitoring of LEAs' use of Title III funds to ensure that funds used for teachers are supplementing, not supplanting, local educational programs. In addition, we recommend that this plan include provisions for on-site monitoring.

Citation: Section 3113, 34 CFR 80.40

Further action required: The State must develop and submit to the U.S. Department of Education a comprehensive plan for monitoring local educational agency (LEA) implementation of Title III, Part A.

Such a plan may have some or all of the following characteristics:

- 1) monitoring is conducted according to a multi-year plan,
- 2) monitoring schedule is set according to identified priorities, such as LEAs with large numbers of limited English proficient (LEP) students, and
- 3) monitoring is coordinated, to the extent appropriate, with monitoring of other Federal programs by the Illinois State Board of Education (ISBE).

Element 6.2 – Consortia

Reviewed: The Illinois State Board of Education (ISBE) provided a list of 24 local educational agencies (LEAs) serving as fiscal agents for consortia (“LIP/LEP cooperating districts”) funded under Title III for FY 2005.

Citation: Section 3114(b)

Title III, Part A Parental Notification

Element 7.1– Parental Notification

Commendation: The Illinois State Board of Education (ISBE) has been thorough in its translation of parental notification letters, and has provided local educational agencies (LEAs) with easy on-line access to such letters. Additionally, the ISBE has exercised great care to issue accurate letters to LEAs regarding annual measurable achievement objective (AMAO) determinations, which in turn trigger parental notifications for not meeting AMAOs, when applicable.

Reviewed: The ISBE provided evidence of parental notification letters for both identification and placement and for failure to meet AMAOs. Parental notification letters have been translated into 28 languages, and are available to LEAs via the Internet. The Home Language Survey is translated into 30 languages. LEAs are required to identify parent involvement and outreach activities to be conducted with Title III funds as part of the State Consolidated Application. State laws require any LEA that has a transitional bilingual education (TBE) program to have a parent advisory council (PAC) that meets on a quarterly basis.

Citation: Section 3302