

October 12, 2023

Dear ELL Task Force Working Group Chairs,

This letter is a response to your memo to the School Committee on September 19, 2023. As the Senior Deputy Superintendent of Academics, I am responding on the district's behalf. As an organization, we are committed to ensuring all students experience a sense of belonging, safety, and joy in learning by uplifting and celebrating their identities and rich cultural and linguistic backgrounds.

This letter serves to reassure all stakeholders that our planning and implementation processes put students' needs and best interests at the forefront of our work while meeting state and federal compliance requirements with DESE regulations and the Successor Settlement Agreement with the United States Department of Justice. We hope to continue a productive dialogue with you regarding inclusion and serving our multilingual learners (MLs) in the Boston Public Schools.

Department of Elementary and Secondary Education (DESE) & Department of Justice (DOJ) Findings

As you know, DESE's Office of Language Acquisition (OLA) recently conducted a Tiered Focused Monitoring Review (TFM) of the district. These reviews are done every six years and aim to monitor compliance with regulatory requirements for English Learner Education. One of the areas that DESE found partially implemented was Criterion ELE 5 - Program Placement and Structure.

Specifically, the TFM report stated:

"The district's definition and implementation of Sheltered English Immersion (SEI) programs is not fully aligned to the current state requirements. The district has what it labels as "language-specific" SEI programs, which serve only English Learners (ELs) who communicate in the same language and who are at the English language proficiency levels 1, 2 and 3. The district also has what it labels as SEI "multilingual programs," which serve only ELs at proficiency levels 1, 2, and 3 from various linguistic backgrounds. While identified by the district as SEI programs, these programs are not designed in a manner consistent with the current requirements for SEI programs" (DESE TFM Report July 17, 2023, p. 6)

The TFM report flagged that current BPS Sheltered English Immersion (SEI) language-specific and SEI-Multilingual Programs do not meet the educational, social, and emotional needs of our students and, in their design, may harm students by isolating them from their grade-level peers and hold them back from participating and engaging in rigorous scaffolded grade-level instruction when they are prepared to do so.

"Furthermore, some students in "language-specific" or "multilingual" SEI programs shared during focus groups that they feel isolated within these programs because they do not have opportunities to interact with their English-speaking peers and learn together with students who do not share their linguistic and cultural background. Some students also shared that this structure hinders their English language development and continues to make it difficult to feel a sense of belonging even

when they exit these classes.” (DESE TFM Report July 17, 2023, p. 7)

In a letter dated August 9, 2022 the Department of Justice also addressed concerns with the existing District Sheltered English Immersion programs in BPS:

“If the District continues to operate ELL-only classes to provide SEI core content instruction (whether these are called “SEI language-specific” or “SEI multilingual” programs), it must ensure that it does not unnecessarily segregate ELLs from their non-ELL peers in violation of Paragraph 37 and must clarify for parents (and the United States) the distinguishing features of such classes (other than their ELL-only makeup).”

BPS Commitment to Supporting our Multilingual Learners (MLs) with Native Language Supports

In response to the July 2023 TFM Report, BPS created a required Continuous Improvement and Monitoring Plan (CIMP) to demonstrate how the district is responding to DESE’s findings. Regarding Criterion ELE 5- Program Placement and Structure, the CIMP outlines our commitment and strategy to aligning Sheltered English Immersion (SEI) in BPS to state definitions, regulations, and guidelines while expanding bilingual education programs and native language access and support. The following outlines critical aspects of this strategic work.

First, BPS knows that ML student progress and achievement data indicate an urgency to improve language acquisition proficiency and academic content mastery outcomes. One of our strategies to address this is having the SEI program redesign include SLIFE and Newcomer programs to ensure native language access with clearly defined entry and exit criteria. This redesign will provide a clear learning acceleration pathway for recently arrived Multilingual learners to join their grade-level, age-appropriate peers in state-defined SEI classrooms and receive explicit English language Development and Sheltered Content instruction provided by qualified and licensed educators without isolating them.

Second, BPS is committed to leveraging the **Look Act** to enhance family engagement efforts and expand bilingual education program access for multilingual learners with and without disabilities. In the revised OMME Strategic plan, we outline the following three Strategic Priorities:

1. Expand Bilingual Educational Programs and Native Language Access Opportunities across programs and services;
2. Improve Educational Opportunities and Outcomes for MLWDs in alignment with the BPS Inclusive Education Plan
3. Develop coherence in ML student identification, placement, and program structure in ways that can be understood and expressed by all BPS stakeholders (students, families, community members, and staff)

Third, BPS has consistently stated that programming changes are not about removing access to the native language. This was stated during our meeting with Superintendent Skipper in June 2023 and reiterated during multiple meetings with task force members over the summer of 2023. We have been clear that our strategic work aims to increase native language access and instruction. That said, BPS knows that language and cultural appreciation do not come only in the form of language-specific programming or by keeping students isolated from the rich cultural diversity of their peers.

Language acquisition research promotes using MLs' native language to facilitate second language development. It is essential to note that the sole use of the native language does not guarantee academic English learning or academic achievement in grade-level core subjects. Research-based programs using native language alongside explicit English language instruction have been found to lead to increased

bilingualism, biliteracy, and sociocultural competency.

Our instructional framework leverages various culturally and linguistically sustaining practices, including access to native language instruction and support across programs and grade levels. Such an approach elevates the value and importance of preserving native languages and cultures through multilingual and multicultural education.

Strategic Supports for Access to Native Language

Our plan for native language access and instruction for all MLs (including those who do not participate in Dual Language Programs and for MLWDs) involves a comprehensive approach to be executed in collaboration with other BPS teams and departments:

Staffing: Having the most qualified educators working in the classroom with our students is critical to the success of the OMME strategic plan. BPS is committed to hiring a culturally, ethnically, and linguistically diverse workforce representative of our student populations. However, it is essential to distinguish the difference between speaking a language and the ability to teach the language and the academic content in such language. Our plan for the expansion of bilingual education programs and native language access addresses this challenge through the development of strategic partnerships with local colleges and universities, collaboration with the teachers' union, and the design of an innovative professional development plan to support native-level academic language proficiency development among teachers and paraprofessionals.

Resources and Professional Learning: To continue to move this work forward, we must give our school-based staff the resources and training necessary to support our students and families. We know we must build the capacity of our educators through guidance and concrete examples on how to effectively leverage the use of native language in classrooms (e.g., use of cognates, transfer of concepts learned in native language, culturally relevant examples, etc.).

Families as Partners: We recognize that, as we expand our program offerings to ensure students have the opportunities and access they deserve, we must also provide choice and honor families' decisions on what's best for their children. We will create family access to native language-rich libraries, include families in volunteer opportunities that leverage native language proficiency, and hold Parent /Family Empowerment Workshops to sustain native language at home.

Communications and OMME Staffing

We would like to close out this letter by addressing the concerns you stated in your September 19, 2023, letter regarding District staffing and communications. Regarding district staffing, we have made specific investments to increase staffing in OMME to support schools through the regional model. There are 9 Multilingual Instructional Coaches and 9 Equity and Accountability Managers. Multilingual Instructional coaches represent the diversity of our students and community. Languages include Spanish, Portuguese, Vietnamese, Cabo-Verdean, Haitian-Creole, French, Greek, Italian, and Chinese. As you may recall from the budgeting process, we also created a department of Bilingual Education, which is led by Ben Parad (Program Director) and has three Multilingual Instructional Coaches who specialize in developing and supporting bilingual programming, including Spanish and Vietnamese dual language, SLIFE, and Newcomers.

We have also hired and onboarded two experienced leaders for OMME, **Carolina Armstrong**, Deputy Chief of Instruction, and **Brittany Baggett**, Deputy Chief of Operations and Accountability. Regarding your concerns that a Chief of OMME has yet to be hired, we have discussed this process with the task force and

the task force representative on the hiring committee. We have yet to identify the right candidate, and we are committed to finding a Chief of OMME with the experience and qualifications required for this critical position.

In response to your concern about communications with district staff, we wanted to clarify the interactions we have had with different groupings of EL Task Force members. Since April 2023, we have had nine meetings with members of the EL Task Forces and District Leaders, including a meeting in June with the Superintendent and the School Committee Chair. BPS has also held five meetings on the strategic priorities, including EL Task Force members. Also, we also want to follow up on your concern about the annual presentation to the School Committee that was initially scheduled for September 27, 2023. The most recent postponement was requested by a task force member due to plans for that member to be traveling outside the United States on that date. The district and the School Committee look forward to this presentation at a future meeting.

Our Commitment

We remain steadfast in our commitment to effectively and holistically serve our multilingual learners in BPS and appreciate continued opportunities to engage with partners committed to this vision. We hope this letter addresses your concerns. Each of our students' cultural and linguistic assets and sense of identity benefit the entire school community. We do not believe in segregating children nor a harmful "English-only" erasure instruction approach. Rather, we stand for research-based, culturally sustaining, inclusive practices that draw upon students' funds of knowledge and will allow us to realize our shared vision as a district and community.

Sincerely,

Linda Chen

Senior Deputy Superintendent of Academics