

**MASSACHUSETTS DEPARTMENT OF ELEMENTARY AND SECONDARY EDUCATION
COORDINATED PROGRAM REVIEW**

**Charter School or District: Worcester Public Schools
Corrective Action Plan Forms**

**Program Area: English Learner Education
Prepared by: Dr. Sergio Páez**

CAP Form will expand to as many lines as necessary. Before completing and emailing to pqacap@doe.mass.edu, please see separate *Instructions for Completing Corrective Action Plans*.

All corrective action must be fully implemented and all noncompliance corrected as soon as possible and no later than one year from the issuance of the Coordinated Program Review Final Report to the school or district.

Mandatory One-Year Compliance Date: October, 23, 2010

COORDINATED PROGRAM REVIEW CORRECTIVE ACTION PLAN (To be completed by school district/charter school)	
Criterion & Topic: ELE 3 Initial Identification	Rating: Partially Implemented
Department CPR Finding: <i>Documentation and staff interviews indicated that the district does not always use qualified staff to initially identify students who are limited-English-proficient and at times do not always assess their level of English proficiency in reading and writing. Furthermore, K-6 students get an initial "approximate" LAU category; initially using an oral exam and then once students are placed into the schools, an ELL teacher re-assesses the students again to confirm the decision originally made, however, at this time, the assessment is completed in all four domains.</i>	
Narrative Description of Corrective Action:	
<ol style="list-style-type: none"> 1. Qualified staff will conduct and oversee the screening and testing in the 4 domains of language development of all new English language Learners entering the Worcester Public Schools. A qualified person has been placed at Parent Information Center to identify and assess Limited-English-proficient students in listening, speaking, reading, and writing. This teacher has a masters' degree in linguistics and has many years of experience working with ELLs. Also a power point has been developed to ensure that every staff member conducting screening and placement of ELLs is following a consistent protocol. 2. Training will be provided to all intake personnel. This training includes the protocols to welcome families and to explain the different language acquisition programs we have available in the district. 	
Title/Role of Person(s) Responsible for Implementation: Director of English Language Learners	Expected Date of Completion for Each Corrective Action Activity: by February 1, 2009

Comment: Page: 3
Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a policy and procedures there will be a series of activities that may include their revision by a workgroup, the dissemination of the revised policy and procedures to appropriate staff, and staff training on effective implementation. (There should also be follow-up activities, to be described under Internal Monitoring Procedures—see below—to ensure that the new policy and procedures are being implemented systemwide and that they continue to be implemented.)

Comment: Page: 3
Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best practice for corrective action for some standards will require collaboration of personnel across more than one program. For example, putting appropriate procedures in place for determining what kind of assessments should be administered and in what language when a limited English proficient student is referred for a special education evaluation might involve the special education administrator, the director of English language education, and perhaps the director of data systems.

Comment: Page: 3
Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In the case of special education, correction of noncompliance as soon as possible but in no case later than one year from identification is required by the federal government in connection with Indicator 15 of the *Massachusetts Part B State Performance Plan for FFY 2005-2010* submitted, as required, in December 2005 to the Office of Special Education Programs of the U.S. Department of Education and revised and reported on thereafter.) Each corrective action activity should have a proposed date for completion for that specific activity ... [1]

Evidence of Completion of the Corrective Action: A New protocol and new placement guidelines were developed to ensure all staff follow the new procedures put in place. This process will ensure that the initial testing and intake process is completed accurately and by qualified staff. Power Point Training Agenda Sign-in sheet	
Description of Internal Monitoring Procedures: Based on new procedures, a weekly record of all placements made based will be maintained. Director of English Language Learners will oversee all procedures to ensure that every student is placed appropriately through weekly review of records and observation of procedures in process.	
CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 3 Initial Identification	Status of Corrective Action: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved
Basis for Partial Approval or Disapproval: None	
Department Order of Corrective Action: None	
Required Elements of Progress Report(s):	
<p>1. By February 26, 2010, the district will submit evidence of its training (the dated agenda, handouts and attendance lists including the name, title and role of participants) provided to all intake personnel involved in the initial identification of limited English proficient students.</p> <p>2. Please submit a copy of the district's new protocol for the initial identification of limited English proficient students.</p> <p>By May 25, 2010, the district will submit the results of an administrative review of all new LEP students (2009-2010 SY) that went through the initial identification procedures required at all levels (elementary, middle, and high schools) to determine whether the personnel involved in the initial identification of students followed the district's revised initial identification protocol.</p> <p>Please submit:</p> <ol style="list-style-type: none"> 1. The number of records review sorted by school. 2. The number of students where the district's revised protocol was followed. 3. For any records found in noncompliance, please identify the root cause(s) of the noncompliance and provide the district's plan to remedy the noncompliance to ensure 100% compliance with this criterion. <p>The district must maintain the following documentation and make it available to the Department upon request: a) The list of student names, building names and grade levels of the students reviewed: b) the date of the review: c) Name(s) of the person(s) who conducted the review, their role(s) and their signature(s).</p>	
Progress Report Due Date(s): February 26, 2010 & May 25, 2010	

Comment: Page: 3
Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the workgroup along with the workgroup's final product, i.e. the revised policy. Training sessions can be documented by copies of the agendas, the training materials and the participant attendance sheets. In some cases evidence of completion should include evidence of a change in practices as a result of the corrective action. In the example of staff training on the disciplinary procedures under IDEA 2004 for suspensions of students with disabilities beyond 10 days, the evidence of completion could include copies of the results of manifestation determinations conducted consistent with the standard. (Documentation of this evidence of completion will be required by the Department.)

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Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampling, record reviews, tracking systems, or any other ongoing or periodic method of oversight by key personnel by which the district can collect data to inform its leadership of progress being made toward meeting the requirements of the standard and by which the district can ensure that it has attained and is maintaining compliance. By planning and implementing these procedures, the district assumes oversight of its systemic practices and responsibility for managing them. In the example of disciplinary procedures, the district might describe its plans for an internal monitoring system. [2]

Comment: Page: 4
Basis for Partial Approval or Disapproval: The Department staff person should provide a summary explanation of why the CAP was partially approved or disapproved, so that it is clear what the Department's rationale was.

Comment: Page: 4
Required Elements of Progress Report(s): The Department staff person should clearly specify what kind of evidence of completion is required, including any supporting documentation and the results of internal monitoring activities.

**COORDINATED PROGRAM REVIEW
CORRECTIVE ACTION PLAN**

(To be completed by school district/charter school)

Criterion & Topic: ELE 5 Program Placement and Structure	Rating: Partially Implemented
<p>Department CPR Finding: <i>Sheltered English immersion (SEI) is a program model for students with limited English proficiency and composed of two parts—English as a second language (ESL) and sheltered content instruction. ESL is explicit, direct instruction about the English language, delivered to students with limited English proficiency only and designed to promote the English language development of the students. Sheltered content instruction is an approach for teaching content to students with limited English proficiency in strategic ways that make the subject matter concepts comprehensible while promoting the students’ English language development.</i></p> <p><i>The Worcester Public Schools serves English Language Learners (ELL) through Sheltered English Immersion (SEI), Transitional Bilingual Education (TBE) and Two-Way models. The district has expanded its number of ESL Lab Schools (schools providing a comprehensive Sheltered English Immersion program) during the 2008-09 school year from two to twenty seven schools. All of the Lab Schools meet the recommended numbers of hours of direct ESL instruction for Lau A students (Beginners) and Lau B (Early Intermediates) as outlined in the Department’s guidance document on this topic issued in June 2005. However, the majority of Lau C (Intermediate) students get little or no direct ESL instruction.</i></p> <p><i>Additionally, documentation indicates that several schools, particularly at the secondary level, report numbers of hours of direct ESL instruction below recommended amounts, even at the Lau A (Beginner) level. At some Worcester schools that do not have ESL Lab programs, students receive ESL instruction for the same amount of ESL instructional time regardless of their proficiency level, in some cases ranging from thirty to forty-five minutes per day</i></p> <p><i>Although ESL instruction is currently based on the English Language Proficiency Benchmarks and Outcomes (ELPBO), there is no formalized ESL curriculum in place district wide; a draft version has been issued and the final version will be introduced during the 2009-10 school year. Classes that have ESL Lab programs are using a textbook series, “Avenues,” specifically designed for English language learners (ELL). Other schools use the Houghton Mifflin series, which has an ELL component.</i></p> <p><i>Because some staff members have not completed SEI PD in all of the four Categories, not all English Language learners are receiving effective sheltered content instruction at appropriate academic levels.</i></p> <p><i>Interviews also indicated that at some locations with kindergartens with significant numbers of ELLs, no ESL or other assistance in acquiring English language skills was provided.</i></p> <p><i>The district’s Newcomers program is to be highly commended for its work in serving students with limited formal schooling. Staff is committed to serving students individually to identify and provide the best education possible for students with complex needs.</i></p>	

Narrative Description of Corrective Action:	
<p>1. The Worcester Public Schools requires that all direct ELD services are aligned with guidelines provided by the DESE. This minimum hours of services recommended will guide all direct services provided by the district.</p> <ul style="list-style-type: none"> • Services to C Lau Students: Based on the significant improvement of ELLs in language development, from last year to this year, the district is able to provide all students at the C Lau level (level III) with direct services they need by qualified staff. • Services to ELLs at the secondary level: Based on the language progression of students at this level, students are able to get the recommended numbers of hours. This is achieved using the ESL sections: 3 sections for Level I, 2 sections for Level II, and 1 section for Level III students. The district is also restructuring the sections at the high school to include the new requirement of 2.5 hours a week for students in levels IV and V. • District Curriculum: The district is fully implementing the ESL Curriculum in every self-contained classroom. This is the first year of full implementation. The ELL Department collects lesson plans from teachers every Friday. These lesson plans should make reference to the strand, grade, and content alignment required for this particular class. <p>2. Professional development has been offered to make sure teachers are learning and implementing this curriculum every day. Schedule of staff meetings and agendas covering the placement and implementation of services will be highlighted. ESL Services to kindergarten students: Last school year we started having PD for all tutors and teachers servicing kindergarten. This training will provide the skills and knowledge necessary to provide interventions meaningful to students at the kindergarten level.</p>	
Title/Role of Person(s) Responsible for Implementation: Director of English Language Learners	Expected Date of Completion for Each Corrective Action Activity: September, 2009 for service delivery schedules and ongoing professional development throughout the year.
Evidence of Completion of the Corrective Action:	
<p>Correlation of minimum hours of services in each school based on English proficiency level</p> <p>Classroom rosters</p> <p>Frequent visits to classrooms</p> <p>Schedules of services submitted by all ESL staff</p> <p>Schedule of staff meetings, and agendas covering the placement and implementation of services will be highlighted, as well as sign-in sheets.</p>	
Description of Internal Monitoring Procedures: Leadership team members will collect and review case loads and schedules and conduct classrooms visits on a bi-weekly basis to ensure services are being delivered	
CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 5 Program Placement and Structure	Status of Corrective Action: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved

Comment: Page: 3
Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a policy and procedures there will be a series of activities that may include their revision by a workgroup, the dissemination of the revised policy and procedures to appropriate staff, and staff training on effective implementation. (There s... [3])

Comment: Page: 3
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Comment: Page: 3
Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the workgroup along with the workgroup's final product, i.e. the revised policy. Training sessions can be documented by copies of the agendas, the training... [6]

Comment: Page: 3
Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampling, record reviews, tracking systems, or any other ongoing or periodic method of oversight by key personnel by which the district can collect data to inform i... [7]

Basis for Partial Approval or Disapproval: None
Department Order of Corrective Action: None
Required Elements of Progress Report(s):
Please submit by February 26, 2010 both student rosters and teacher schedules for all LEP students within the district for a) all non-Lab schools; b) all secondary level schools; and c) all students in proficiency levels III, IV and V demonstrating that these three groups of students are receiving the minimum number of hours of direct ESL instruction.
Please submit by May 25, 2010 the final copy of district's ESL Curriculum for all grade levels to DESE.
Progress Report Due Date(s): February 26, 2010 & May 25, 2010

Comment: Page: 4
Basis for Partial Approval or Disapproval: The Department staff person should provide a summary explanation of why the CAP was partially approved or disapproved, so that it is clear what the Department's rationale was.

Comment: Page: 4
Required Elements of Progress Report(s): The Department staff person should clearly specify what kind of evidence of completion is required, including any supporting documentation and the results of internal monitoring activities.

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COORDINATED PROGRAM REVIEW CORRECTIVE ACTION PLAN (To be completed by school district/charter school)	
Criterion & Topic: ELE 9 Instructional Grouping	Rating: Partially Implemented
Department CPR Finding: <i>At some Worcester schools that do not have ESL Lab programs, students receive ESL instruction for the same amount of ESL instructional time regardless of their proficiency level, in some cases ranging from thirty to forty-five minutes per day.</i>	
Narrative Description of Corrective Action:	
<ol style="list-style-type: none"> 1. The Worcester Public Schools requires that students at different Lau levels receive the minimum amount of services required. These services are offered by dually licensed teachers. The district increased the implementation of ESL Labs from 27 to 40 classrooms across the city. This increase of 48% represents a significant improvement in the services provided to ELLs. We are continuously looking for new sites and new ways to provide meaningful services to ELLs across the district. 2. High quality professional development is being implemented in the district with all teachers providing direct services to ELLs in ESL Labs. This is ongoing professional development that meets every 6 weeks to review the quality and the implementation of language acquisition programs. 	
Title/Role of Person(s) Responsible for Implementation: Director of English Language Learners	Expected Date of Completion for Each Corrective Action Activity: September, 2009 for program implementation and ongoing throughout the year for professional development.
Evidence of Completion of the Corrective Action:	
All schools across the district will have classrooms available to deliver the required number of hours of services; ESL teacher schedules. Agendas of HQ PD and content covered in each of the session will be maintained. This evidence has been collected since the beginning of this process at the beginning of the 2008-2009 school year.	

Comment: Page: 3
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Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of ... [9]

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Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In ... [10])

Comment: Page: 3
Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the ... [11]

Description of Internal Monitoring Procedures:	
Classroom rosters SAGE report Staff schedule of services and information from classroom visits will be gathered and reviewed quarterly.	
CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 9 Instructional Grouping	Status of Corrective Action: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved
Basis for Partial Approval or Disapproval: None	
Department Order of Corrective Action: None	
Required Elements of Progress Report(s): Please submit by February 26, 2010 samples of high quality professional development provided to ESL staff; including the agendas and sign-in sheets where available. <i>Please see ELE 5</i> for the required progress report elements pertaining to full implementation of the minimum number of hours of direct ESL instruction for all grade and proficiency levels as part of the May 25, 2010 progress report.	
Progress Report Due Date(s): February 26, 2010 & May 25, 2010	

Comment: Page: 3
Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampling, record reviews, tracking systems, or any other ongoing or periodic method of oversight by key personnel by which the district can collect data to inform its leadership of progress being made toward meeting the requirements of the standard and by which the district can ensure that it has attained and is maintaining compliance. By planning and implementing these procedures, the district assumes oversight of its systemic practices and responsibility for managing them. In the example of disciplinary procedures, the district might describe its plans for an internal monitoring system whereby the Team chairperson for each school periodically reviews the disciplinary logs maintained by the school, cross-references them with the student's records to ensure that there is evidence of appropriate actions taken consistent with the IDEA 2004 requirements, and provides feedback to special education staff, regular education administrators, and the special education administrator. By use of this review and feedback the district will be able ... [12]

COORDINATED PROGRAM REVIEW CORRECTIVE ACTION PLAN (To be completed by school district/charter school)	
Criterion & Topic: ELE 11 Equal Access to Academic Programs and Services	Rating: Partially Implemented
Department CPR Finding: <i>The district does not always translate documents for parents who require notices in languages other than English. LEP students are not provided English Language Education consistent with the requirements of MGL Ch. 71A. Please see the comments for ELE 5, SE 29, SE 48, CR 3, CR 7 and CR 14.</i>	
Narrative Description of Corrective Action:	
1. The District revised its protocol for allocating English Language Learner Instruction to include all LAU categories and levels. The district made significant changes in the translations offered to all of our parents. We assigned a qualified staff person to coordinate all translations in the district. The reorganization has given us the opportunity to review all of our procedures. We have developed new standards for all translators servicing the district, in particular with regard to their qualification to produce high-quality translations. We also developed a list of all translators being utilized by different departments (SPED, ELL and other departments). This list provides us with a pool of qualified translators accessed through a centralized location and protocol. Lastly, a database of essential and non-essential documents is being created to avoid the duplication of documents that are consistently used by the district.	

Comment: Page: 4
Basis for Partial Approval or Disapproval: The Department staff person should provide a summary explanation of why the CAP was partially approved or disapproved, so that it is clear what the Department's rationale was.

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Required Elements of Progress Report(s): The Department staff person should clearly specify what kind of evidence of completion is required, including any supporting documentation and the results of internal monitoring activities.

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Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a policy and procedures there will be a series of activities that may include their revision by a workgroup, the dissemination of the revised policy and procedures to appropriate staff, and staff training on effective implementation. (There should also be follow-up activities, to be ... [13])

Title/Role of Person(s) Responsible for Implementation: Human Resources Office and Chief Academic Officer	Expected Date of Completion for Each Corrective Action Activity: Started on September 1, 2009 and will continue being developed until it reaches the level of compliance necessary to satisfy the needs of our schools.
Evidence of Completion of the Corrective Action: All essential documents will be translated into the 4 major languages identified by DOJ and DESE	
Description of Internal Monitoring Procedures: Record keeping of all translations completed by the assigned staff member will be reviewed quarterly. Establishing a data bank to share common documents with all schools in the district	
CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 11 Equal Access to Academic Programs and Services	Status of Corrective Action: <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved
Basis for Partial Approval or Disapproval: Please see the comments for, SE 29, SE 48, CR 3, CR 7 and CR 14.	
Department Order of Corrective Action: None	
Required Elements of Progress Report(s): Please see the requirements for translations under SE 29, SE 48, CR 3, CR 7 and CR 14.	
Progress Report Due Date(s): February 26, 2010 & May 25, 2010	

Comment: Page: 3
Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best practice for corrective action for some standards will require collaboration of personnel across more than one program. P ... [14]

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Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In ... [15])

Comment: Page: 3
Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the ... [16]

Comment: Page: 3
Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampli ... [17]

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Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a p ... [18]

COORDINATED PROGRAM REVIEW CORRECTIVE ACTION PLAN (To be completed by school district/charter school)	
Criterion & Topic: ELE 15 Professional Development Requirements	Rating: Partially Implemented
Department CPR Finding: <i>At some schools, particularly at the secondary level, faculty have not completed all of the required Category trainings in order to be considered "qualified" to shelter content for English language learners. However, at many elementary schools, ninety percent or greater of staff have completed all of the Category trainings. The majority of staff has been trained in Categories one and three, more than 50 percent district-wide.</i>	
<i>The district is making clear and steady progress with assisting teachers to take Category trainings for sheltered English Immersion professional development.</i>	
Narrative Description of Corrective Action:	
<ol style="list-style-type: none"> Professional development opportunities will be offered to all teachers in the district with a specific emphasis on teachers at the secondary level. The ELL Department will continue with the development of multiple opportunities for teachers to take the training. These opportunities include opportunities during the day, afterschool, Saturdays, and summer components. The ELL department is also exploring the possibility to build embedded PD with a selected group of schools. 	

Title/Role of Person(s) Responsible for Implementation: Director of English Language Learners	Expected Date of Completion for Each Corrective Action Activity: Starting at the beginning of the 2009 school year and continue in the following months as needed.
Evidence of Completion of the Corrective Action: Percentages of teachers taking the training in each of the categories by levels and records maintain by DESE	
Description of Internal Monitoring Procedures: Record of offerings approved by the curriculum office Internal record of category training completion kept by ELL Department	
CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 15 Professional Development Requirements	Status of Corrective Action: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved
Basis for Partial Approval or Disapproval: None	
Department Order of Corrective Action: None	
Required Elements of Progress Report(s): Please submit by February 26, 2010 a database demonstrating percentages of teachers having completed each category of training, and the district's SEI Professional Development plan for completion of all remaining category trainings for teachers who are not currently "qualified" in all four categories.	
Progress Report Due Date(s): February 26, 2010	

COORDINATED PROGRAM REVIEW CORRECTIVE ACTION PLAN (To be completed by school district/charter school)	
Criterion & Topic: ELE 16 Equitable Facilities	Rating: Partially Implemented

Comment: Page: 3
Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best practice for corrective action for some standards will require collaboration of personnel across more than one program. For example, putting appropriate pro... [19]

Comment: Page: 3
Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In ... [20]

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Department CPR Finding: *Observations and interviews indicated that City View Elementary School has a part time ESL teacher providing pullout services in a hallway space outside the library.*

Observations and interviews indicated that Burncoat High School has one of its classes in the cafeteria.

Observations and interviews at Goddard Elementary School indicated that one TBE class is located in the basement near a preschool classroom and one ESL tutorial classroom is in a location that is cramped, confining, and is not equal in all physical respects to the average standards of general education facilities and classrooms for the number of students assigned.

Interviews and documentation indicated that one of the ESL teachers in Midland Elementary School is working in a small semi partitioned area outside a classroom.

Interviews and documentation indicated that one of the ESL teachers at Heard Street Elementary School is working in a supply closet.

Observations and interviews indicated that on Level one of South High School there is an ESL classroom that is situated between two other classrooms and can only be accessed by first entering an adjoining classroom.

Interviews and documentation indicated that in one of the ESL classrooms at Claremont Academy, students have to first walk into another classroom in order to get into the ESL classroom.

Interviews and observations indicated that one of the ESL classrooms in Lincoln Street Elementary School is located in a small open area.

Interviews and documentation indicates that the full time ESL teacher at Rice Square Elementary School is in a location that is cramped, confining, and is not equal in all physical respects to the average standards of general education facilities and classrooms for the number of students assigned, while the part-time ESL tutor is located in a portion of the library that has been divided up to accommodate several itinerant staff.

Observations and interviews indicated that the ESL teacher at Gates Lane Elementary School has a room that is shared with the Reading Coach. Observations and interviews indicated that the ESL teacher has two ESL groups that meet in the library. Interviews and documentation indicated that Tamuck Elementary School has ESL classes in the library.

Interviews and documentation indicated that both the Thorndyke Elementary and May Street Elementary Schools contain classrooms that are in a location that is cramped, confining, and is not equal in all physical respects to the average standards of general education facilities and classrooms for the number of students assigned.

Narrative Description of Corrective Action:	
<ol style="list-style-type: none"> Based on the different instructional needs of our ELLs in Worcester Public Schools, all settings where instruction in being offered to ELL must be appropriate and conducive to learning. <ul style="list-style-type: none"> Goddard: There is no longer a program housed at Goddard. This program is now placed at Chandler Magnet Elementary school. The ESL teacher is providing support to Ells in the classroom following the push-in model instead of the pull-out system. This method eliminates the use of inappropriate facilities to provide language acquisition services. Midland: The part time ESL support is being provided for the most part in a push-in model instead of the pull-out system. Heard St.: The part time ESL support is still working in a closet. It has been clean up to make more room to deliver services there. We are working to develop a better plan. South High: The school has opened space and TBE and ESL are using the same space as any other classroom in the school. Claremont: The small room we are using is within another classroom. However, the entrance is right next to the classroom so the students no longer cut through the class to enter or exit the classroom. Lincoln St.: We were given a classroom for the full time ESL teacher to be used as an ESL Lab. Part time ESL tutor works in most classrooms as push in ESL and occasionally pulls out a group or two into available space. Rice Square: Full time ESL teacher continues to teach in the small area and part time ESL tutor has a space located in a portion of the library with other itinerants Gates Lane: This school is now implementing services using a full classroom for an ESL Lab and the part time tutor works push-in. Tatnuck Elementary: This school is now implementing services using a full classroom for an ESL Lab. It has not been determined where the part time tutor will take a group of five 5-6th graders. May St: We have a part time tutor who is providing services via push-in model. Thorndyke: The ESL Tutor has been given a larger room in the basement with more room to implement services. In collaboration with administrators, a report on how facilities are being utilized in each building will be drafted. This report will include the location in which language acquisition services are being delivered. 	
Title/Role of Person(s) Responsible for Implementation:	Expected Date of Completion for Each Corrective Action Activity:
Director of English Language Learners	September 1, 2009
Evidence of Completion of the Corrective Action:	
All settings utilized for instruction will be appropriate and conducive to learning; building floor plans designating ESL instructional space	
Description of Internal Monitoring Procedures:	
Audits will be conducted to ensure all instructional locations are acceptable and appropriate for ELLs. These audits will be conducted in collaboration with principals and district managers twice a year.	

Comment: Page: 3
Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a policy and procedures there will be a series of activities that may include their revision by a workgroup, the dissemination of the revised policy and procedures to appropriate staff, and staff training on effective implementation. (There ... [23])

Comment: Page: 3
Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best practice for corrective action for some standards will require collaboration of pers (... [24])

Comment: Page: 3
Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In the case of special education, correction of noncompliance as soon as possible but in no case later than one year from identification is required by the f (... [25])

Comment: Page: 3
Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the workgroup along with the workgroup's final product, i.e. the revised policy. Training sessions can be documented by copies of the agendas, the trainin (... [26])

Comment: Page: 3
Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampling, record reviews, tracking systems, or any other ongoing or periodic method of oversight by key personnel by which the district can collect data to inform (... [27])

CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 16 Equitable Facilities	Status of Corrective Action: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved
Basis for Partial Approval or Disapproval: None	
Department Order of Corrective Action: None	
Required Elements of Progress Report(s): _____	
<p>The district will submit the results of a review of all ESL locations district-wide for the 2010-2011 SY to ensure that LEP students are provided facilities comparable to those provided to the overall student population.</p> <p>Please submit:</p> <ol style="list-style-type: none"> 1. Verification that the district reviewed all of its ESL locations within Worcester Public Schools. 2. Please identify the locations by school that were not comparable to those provided to the overall student population. 3. For locations not in compliance with this criterion, please provide the district's plan to remedy the noncompliance. <p>The district must maintain the following documentation and make it available to the Department upon request: a) Building floor plans designating ESL instructional space floor plans b) Name(s) of the person(s) who conducted the review, their role(s) and their signature(s).</p>	
Progress Report Due Date(s): May 25, 2010	

Comment: Page: 4
Basis for Partial Approval or Disapproval: The Department staff person should provide a summary explanation of why the CAP was partially approved or disapproved, so that it is clear what the Department's rationale was.

Comment: Page: 4
Required Elements of Progress Report(s): The Department staff person should clearly specify what kind of evidence of completion is required, including any supporting documentation and the results of internal monitoring activities.

COORDINATED PROGRAM REVIEW CORRECTIVE ACTION PLAN (To be completed by school district/charter school)	
Criterion & Topic: ELE 18 Records of LEP Students	Rating: Partially Implemented
<p>Department CPR Finding: <i>A review of student records indicated that LEP student records do not always include the results of identification and proficiency tests and evaluations, including MELA-O, MEPA, MCAS, or other tests chosen by the Board of Education and the district, copies of initial parent notification letters, copies of annual parent notification letters, progress reports for elementary education students, report cards in the native language when necessary or evidence of follow-up monitoring (when applicable).</i></p>	

Narrative Description of Corrective Action:	
<p>1. All documentation required for ELLs, starting with the Home Language Survey, will be placed in students folders. This process will begin at the Parent Information Center. During the intake process, student will be assigned an individual folder that will contain all information required. This folder will become part of the full cumulative folder required for students in the Worcester Public Schools and maintained in the school office. From that point forward the ESL staff assigned to each school with ELL students will maintain the folder. The ELL Department developed a protocol to periodically review students' records to ensure all students have the required documentation on file. In addition to this, the changes at Parent Information Center are providing better record keeping of documentation needed for ELLs.</p> <p>2. This information will be reviewed with all teachers during the scheduled staff meeting during the school year.</p>	
Title/Role of Person(s) Responsible for Implementation: Director of English Language Learners	Expected Date of Completion for Each Corrective Action Activity: Starting on September 1, 2009 until all documentation in folders is completed
Evidence of Completion of the Corrective Action:	
<p>All documentation in folders must be completed. The documents required in this folders are:</p> <ul style="list-style-type: none"> ▪ Home language survey ▪ Record of testing in the 4 domains of language (Listening, speaking, reading and writing) ▪ ELL Enrollment check list ▪ Final Placement form ▪ Program choice form ▪ A native writing sample 	
Description of Internal Monitoring Procedures: At the beginning and at the end of each school year, designated ESL staff will conduct a cumulative folder review to ensure all documentation is included in students' folders	
CORRECTIVE ACTION PLAN APPROVAL SECTION (To be completed by the Department of Elementary and Secondary Education)	
Criterion: ELE 18 Records of LEP Students	Status of Corrective Action: <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Partially Approved <input type="checkbox"/> Disapproved
Basis for Partial Approval or Disapproval: Not all required documentation listed in ELE 18 has been listed as required documentation in the "Evidence of Completion of the Corrective Action" noted above.	
Department Order of Corrective Action:	
<p>All LEP student records should include:</p> <ol style="list-style-type: none"> a) home language survey; b) results of identification and proficiency tests and evaluations, including MELA-O, MEPA, MCAS, or other tests chosen by the Board of Education and the district; c) information about students' previous school experiences; d) copies of parent notification letters, progress reports and report cards (in the native language, if necessary); e) evidence of follow-up monitoring (if applicable); f) documentation of a parent's consent to "opt-out" of English learner education, if 	

Comment: Page: 3
Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a policy and procedures there will be a series of activities that may include their revision by a workgroup, the dissemination of the revised policy and procedures to appropriate staff, and staff training on effective implementation. (There ... [28])

Comment: Page: 3
Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best ... [29]

Comment: Page: 3
Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In the case of special education, correction of noncompliance as soon as possible ... [30])

Comment: Page: 3
Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the workgroup along with the workgroup's final product, i.e. the revised policy ... [31]

Comment: Page: 3
Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampling, record reviews, tracking systems, or any other ongoing or periodic method ... [32]

Comment: Page: 4
Basis for Partial Approval or Disapproval: The Department staff person should provide a summary explanation of why the CAP was partially approved or disapproved, so that it is clear what the Department's rationale was.

- applicable;
- g) waiver documentation, if applicable; and
- h) Individual Student Success Plans for students who have failed MCAS, if the district is required to complete plans for non-LEP students.

Required Elements of Progress Report(s): 1. By February 26, 2010, the District will submit evidence of its training (the dated agenda, handouts and attendance lists including name, title and role of participants) provided to all ELL staff on the regulations that require that all LEP student records include:

- a) home language survey;
- b) results of identification and proficiency tests and evaluations, including MELA-O, MEPA, MCAS, or other tests chosen by the Board of Education and the district;
- c) information about students' previous school experiences;
- d) copies of parent notification letters, progress reports and report cards (in the native language, if necessary);
- e) evidence of follow-up monitoring (if applicable);
- f) documentation of a parent's consent to "opt-out" of English learner education, if applicable;
- g) waiver documentation, if applicable; and
- h) Individual Student Success Plans for students who have failed MCAS, if the district is required to complete plans for non-LEP students.

By **May 25, 2010**, the District will submit the results of an administrative review of a sampling of LEP student records from all levels (elementary, middle, and high schools) to determine compliance regarding the requirements of ELL student content.

Please provide:

1. The number of records reviewed at each school level.
2. The number of records and level that content the required documentation.
3. For any records found in continued noncompliance, determine the root cause(s) of the noncompliance and provide the district's plan to remedy the identified noncompliance.

The district must maintain the following documentation and make it available to the Department upon request: a) List of student names, building names and grade levels of records reviewed: b) Date of the review: c) Name(s) of the person(s) who conducted the review, their role(s) and their signature(s).

Progress Report Due Date(s): February 26, 2010 & May 25, 2010

Comment: Page: 4

Required Elements of Progress Report(s): The Department staff person should clearly specify what kind of evidence of completion is required, including any supporting documentation and the results of internal monitoring activities.

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Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In the case of special education, correction of noncompliance as soon as possible but in no case later than one year from identification is required by the federal government in connection with Indicator 15 of the *Massachusetts Part B State Performance Plan for FFY 2005-2010* submitted, as required, in December 2005 to the Office of Special Education Programs of the U.S. Department of Education and revised and reported on thereafter.) Each corrective action activity should have a proposed date for completion for that specific activity well before the one-year anniversary of the CPR Final Report.

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Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best practice

for corrective action for some standards will require collaboration of personnel across more than one program. For example, putting appropriate procedures in place for determining what kind of assessments should be administered and in what language when a limited English proficient student is referred for a special education evaluation might involve the special education administrator, the director of English language education, and perhaps the director of data systems.

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practices as a result of the corrective action. In the example of staff training on the disciplinary procedures under IDEA 2004 for suspensions of students with disabilities beyond 10 days, the evidence of completion could include copies of the results of manifestation determinations conducted consistent with the standard. (Documentation of this evidence of completion will be required by the Department.)

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Title/Role of Person(s) Responsible for Implementation: The primary staff responsible for implementing the corrective action should be identified by role or job function. As a matter of best practice, the program director or administrator should have the overall responsibility for the correction of noncompliance by the implementation of corrective action. However, best practice for corrective action for some standards will require collaboration of personnel across more than one program. For example, putting appropriate procedures in place for determining what kind of assessments should be administered and in what language when a limited English proficient student is referred for a special education evaluation might involve the special education administrator, the director of English language education, and perhaps the director of data systems.

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Expected Date of Completion for Each Corrective Action Activity: All noncompliance in all programs monitored in the Coordinated Program Review must be corrected as soon as possible, but in no case later than one year from identification, i.e., from the date of issuance of the Final Report. (In the case of special education, correction of noncompliance as soon as possible but in no case later than one year from identification is required by the federal government in

connection with Indicator 15 of the *Massachusetts Part B State Performance Plan for FFY 2005-2010* submitted, as required, in December 2005 to the Office of Special Education Programs of the U.S. Department of Education and revised and reported on thereafter.) Each corrective action activity should have a proposed date for completion for that specific activity well before the one-year anniversary of the CPR Final Report.

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Evidence of Completion: The school/district should describe the evidence it will collect in order to document the completion of each of the activities that make up the corrective action. For example, for a workgroup that is revising a school/district policy, it can collect meeting minutes from the workgroup along with the workgroup's final product, i.e. the revised policy. Training sessions can be documented by copies of the agendas, the training materials and the participant attendance sheets. In some cases evidence of completion should include evidence of a change in practices as a result of the corrective action. In the example of staff training on the disciplinary procedures under IDEA 2004 for suspensions of students with disabilities beyond 10 days, the evidence of completion could include copies of the results of manifestation determinations conducted consistent with the standard. (Documentation of this evidence of completion will be required by the Department.)

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Description of Internal Monitoring Procedures: Each school/district should describe the ongoing monitoring procedures that it will use to determine whether the previously identified noncompliance has been corrected and to ensure continued compliance. These procedures could include sampling, record reviews, tracking systems, or any other ongoing or periodic method of oversight by key personnel by which the district can collect data to inform its leadership of progress being made toward meeting the requirements of the standard and by which the district can ensure that it has attained and is maintaining compliance. By planning and implementing these procedures, the district assumes oversight of its systemic practices and responsibility for managing them. In the example of disciplinary procedures, the district might describe its plans for an internal monitoring system whereby the Team chairperson for each school periodically reviews the disciplinary logs maintained by the school, cross-references them with the student's records to ensure that there is evidence of appropriate actions taken consistent with the IDEA 2004 requirements, and provides feedback to special education staff, regular education administrators, and the special education administrator. By use of this review and feedback the district will be able to direct training or other resources to those specific schools or personnel needing further assistance.

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Narrative Description of Corrective Action: The school/district should describe the sequence of specific activities it will implement in order to remedy the identified noncompliance. Corrective action should be more than a single event. For example, if the school/district needs to revise a policy and procedures there will be a series of activities that may include their revision by a workgroup, the dissemination of the revised policy and procedures to appropriate staff, and staff training on effective implementation. (There should also be follow-up activities, to be described under Internal Monitoring Procedures—see below—to ensure that the new policy and procedures are being implemented systemwide and that they continue to be implemented.)

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