

INDIANA DEPARTMENT of EDUCATION

# English Learners & Title III Guidance:

# Accredited Non-Public Schools

# Indiana Department of Education

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in.gov/doe/

# Overview

The Indiana Department of Education's (IDOE's) Office of English Learning and Migrant Education and Office of the Ombudsman and Equitable Services have developed this guidance for accredited non-public schools as they navigate partnerships with local educational agencies (LEAs) to identify, assess, and evaluate the impact of local English learner (EL) and Title III programming.<sup>1</sup> Schools can additionally reference the Equitable Services and Title III Frequently Asked Questions for additional support.

Since the initial passage of the Elementary and Secondary Education Act of 1965 (ESEA), students and educators in accredited non-public schools have been eligible to participate in certain ESEA programs. The reauthorization of ESEA as the Every Student Succeeds Act (ESSA) continues this requirement that a state educational agency (SEA), LEA, an educational service agency, a consortium of those agencies, or another entity that receives funds under a Title VIII-covered program (which includes Title III funding) provide equitable services to eligible students attending non-public schools and their teachers or other educational personnel. This guidance is intended to be used in conjunction with the applicable statute and regulations by both public and private school officials.

Please note that this guidance is not meant to supersede federal regulations regarding non-public school participation in Title III, but rather to provide a concise summary. Please see ESEA, Title VIII, Section 8501 Part F Uniform Provisions Subpart 1 for regulatory guidance. ESEA guidance is listed in the *Resources* section for reference.

<sup>&</sup>lt;sup>1</sup> Any unaccredited non-public school interested in Title III funding and EL identification, please contact the Ombudsman <u>ombudsman@doe.in.gov</u>

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### Introduction

The purposes of Title III, Part A, as described in ESEA Section 3102, are:

- To help ensure that ELs, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English;
- To assist ELs, including immigrant children and youth, to achieve at high levels in academic subjects;
- To assist teachers, principals, and other school leaders in establishing, implementing, and sustaining effective language instruction educational programs;
- To assist teachers, principals, and other school leaders to develop and enhance their capacity to provide effective language instruction educational programs; and
- To promote parental, family, and community participation in language instruction education programs.

Students who are formally identified as ELs are eligible to receive Title III services and funding. ELs are identified based on the responses to the Indiana Home Language Survey (HLS) and the results of their participation in a WIDA English language proficiency (ELP) assessment. Indiana is a member of the WIDA Consortium and has adopted WIDA assessments (WIDA Screener as the placement assessment; WIDA ACCESS or Alternate ACCESS as the annual assessment) to determine students' English proficiency and their EL status. EL students are eligible to generate Title III funding regardless of their attendance at a public or accredited non-public school. To access funding for these students, schools must accurately assess and report EL students to IDOE via Data Exchange, and opt in to Title III via the spring consultation process. This process includes a formal consultation document in the spring that the LEA submits to the SEA (IDOE) annually. This document's subsequent sections provide greater detail into the consultation, identification, testing, and programmatic requirements for EL students.

# Section I: LEA & Non-Public School Consultation

For a more detailed understanding of consultation, please refer to Indiana's Ombudsman website, equitable services non-regulatory guidance, and FAQs in <u>Section V of this document.</u>

Effective implementation of an ESEA program for eligible non-public school students and educators requires timely and meaningful consultation with relevant school officials by the LEA. LEA and non-public schools discuss key issues impacting the ability of eligible non-public school students to participate in ESEA programs to the same degree as public school peers. Successful consultation establishes positive and productive working relationships, makes planning effective, continues throughout the implementation of equitable services, and ensures that the services provided meet the needs of eligible children and educators. A unilateral offering of services by an LEA with no opportunity for discussion or the application of a blanket rule is not adequate consultation. Relevant officials should only determine final decisions with respect to these services following thorough discussion and agreement of next steps. Success and effective consultation can promote the following strategic outcomes:

- Promotes positive and timely working relationships throughout the year;
- Ensures meaningful planning;
- Supports the ongoing implementation of equitable services; and
- Ensures that the services provided meet the needs of eligible children and educators.

During consultation, the following general topics should be discussed. The record of the consultation will be provided to the state's Ombudsman.

- 1. How the children's needs will be identified;
- 2. How to identify and report students needing English language services;
- 3. What services will be offered;
- 4. How, where, and by whom the services will be provided;
- 5. How the services will be academically assessed;
- 6. The size and scope of the services to students (i.e., funding for services amount);
- 7. How disagreement is handled;
- 8. Who is providing services; and
- 9. How funding will be provided.

In the event a disagreement arises between the non-public school and LEA officials regarding Title III services, the non-public school can file a letter of concern to the LEA and request another meeting. If the LEA is not able to resolve the concern, non-public schools may file a complaint with the state Ombudsman.

Some examples of Title III, Part A equitable services that an LEA may provide to non-public school ELs, their teachers, and other educational personnel include:

- Administration of an ELP assessment for identification of ELs and/or to evaluate the effectiveness of services, including the provision of test booklets, teacher training, and stipends to teachers to administer assessments;
- Tutoring for ELs before, during, or after school hours;

- Professional development for non-public school teachers of ELs;
- Summer school programs to provide English language instruction for ELs;
- Family literacy services and parent and family outreach and training activities to support the education of ELs in non-public schools; and
- Provision of supplemental instructional materials and supplies. These materials and supplies must be clearly labeled and identified as the LEA's property and must be secular, neutral, and non-ideological.

The LEA must maintain oversight of all materials and supplies purchased with Title III, Part A funds for non-public schools. As with all services and materials provided with Title III, Part A funds, any materials, supplies, and services must be supplemental to what the non-public school would otherwise provide without the Title III, Part A services. However, non-public LEAs that participate in Title III may use funds to administer the state-approved ELP assessments.

### Section II: EL Programming Requirements

This section details key EL programming compliance components including the definition and table detailing what is or is not required for non-public schools. Additional information on these compliance components is available in IDOE's English Learner Guidebook on the English Learning and Migrant Education webpage.

#### Key Components of EL Programming for Non-Public Schools

- Administer the Home Language Survey (HLS): The HLS is a legally binding document that should only be completed once during a child's Indiana academic career upon their first enrollment in Indiana schools. To avoid duplicate administration, the HLS should not be included in the school enrollment packet but only given to those students who have confirmed that they are enrolling in an Indiana school for the first time. The HLS must be kept in the student's cumulative folder as part of the permanent record and, in case of transfer, must follow the student to the receiving school. Any student whose original HLS has a language other than English for the three questions is assessed for current English proficiency. Refer to <u>Section V</u> and IDOE's <u>English Learning and Migrant Education webpage</u> for more information on the HLS.
- Identify English Learners Using WIDA Screener Placement Test: When a student enrolls with a HLS indicating a language other than English for any of the three questions and has not been previously identified as an EL by another Indiana school or another WIDA consortium state, their ELP must be assessed via the WIDA Screener. Students who receive an overall proficiency level between 1.0–4.9 enter EL status. IDOE provides materials for the WIDA Screener for Kindergarten and the WIDA Screener (grades 1-12) to identify ELs. For more information, see IDOE's EL Identification and Placement Guidance on the Indiana WIDA webpage.
- Send the Annual Parent Notification Letter: Parents of students participating in Title III services must be notified annually of their student's current ELP level, service plan, and parental rights. Notification must be sent no later than 30 calendar days after the beginning of the school year for all ELs, both newly and previously identified. For students enrolling after the beginning of the school year, parental notification must be provided within two weeks of a child being identified and placed in a program. For an example of the Annual Parent Notification Letter, please visit IDOE's English Learning and Migrant Education webpage.
- Test Identified EL Students Annually with WIDA ACCESS: Identified ELs are tested with an annual ELP assessment during the state-defined testing window, generally occurring in January and/or February. IDOE requires the use of WIDA ACCESS for all choice schools, Indiana accredited schools, and LEAs participating in statewide testing and provides the annual materials for administering WIDA ACCESS. More information can be found on IDOE's <u>WIDA</u> webpage and <u>Indiana WIDA webpage</u>.
- Receive Title III Equitable Services: Non-public schools that wish to participate in Title III must have qualifying student demographic and associated multilingual learner program data submitted to IDOE via Data Exchange and participate in consultation with their neighboring Title III-participating LEA regarding the provision of equitable Title III services. These services and

their implementation are discussed and decided during the consultation process. More information can be found on IDOE's <u>Equitable Services and Ombudsman webpage</u>.

- **Reporting Multilingual Learner Students:** To be eligible for Title III funding, schools with qualifying students must submit student demographic and associated multilingual learner student program data to IDOE via Data Exchange, which includes identified ELs. Student data should be submitted and reviewed throughout the academic year. *October 1 is the annual deadline for certifying validated data to be used for allocation and accountability measures.* Accurately reported ELs generate Title III equitable share for the following year. For more information, see the Multilingual Learners Reporting Guide in IDOE's <u>Data Knowledge Hub</u>.
- Provide Lau-required English Language Development (ELD) Services: All public LEAs must provide core ELD services for all qualifying ELs. Per Lau v. Nichols, services must allow for meaningful and equitable access to all grade-level appropriate educational programs until students reach English proficiency. Services must be targeted to student needs, including but not limited to, English proficiency, academic background, sociocultural background, and proficiency in their preferred language. For more information on providing core ELD services, read IDOE's EL Guidebook and EL Teacher of Record Guidance Documents on IDOE's English Learning and Migrant Education webpage..
- Create and Implement Individual Learning Plans (ILPs): Identified ELs are eligible for an ILP. An ILP is a legally binding document, and all staff who work with the student are responsible for its implementation. IDOE recommends that the ILP be created by EL staff in collaboration with content-area teachers to promote ongoing communication across programs to ensure that all responsible staff are aware of its implications.

An ILP may detail a) teaching and learning strategies, b) instructional and assessment accommodations, c) academic and classroom modifications, d) linguistic and academic goals, e) ELP levels, and f) state and local assessment data. ILPs should be revised at least once annually with students and parents to reflect students' language proficiency growth, but it can be updated as needed in response to student needs. For more information on ILPs, review the corresponding section within the *EL Guidebook* on IDOE's English Learning and Migrant Education webpage.

Formal Two-Year Monitoring Process for Exited ELs: Students who exited EL status in the previous school year must be formally monitored for at least two years to ensure they are meaningfully participating in the district's educational program in a manner that is comparable to their native English-speaking peers and other ELs who exited at the same time. Monitoring processes are defined locally but may include benchmarks that include academic growth and procedures to assist students who are not making adequate progress. For details on the monitoring process and procedural recommendations, review the corresponding section within the *EL Guidebook* on IDOE's English Learning and Migrant Education webpage. For additional guidance, review <u>Chapter 8 of the U.S. Department of Education's EL Toolkit</u>.

#### **Table 1: EL Programming Requirements**

The table below details which EL programming components, as defined above, are required for each type of non-public school. See footnotes for additional context:

| New Dublic El   | Choice Non-Public School  |   | Accredited Non-Public School |   |
|---|---------------------------|---|------------------------------|---|
| Non-Public EL<br>Programming<br>Requirements                            | Participates<br>Title III | Does NOT<br>Participate in<br>Title III | Participates in<br>Title III | Does NOT<br>Participate in<br>Title III |
| Administer the Home<br>Language Survey                                  | >                         | ~                                       | ~                            | Recommended                             |
| Identify ELs via the WIDA<br>Screener Placement Test*                   | >                         | ~                                       | ~                            | ✓*                                      |
| Send the Annual Parent<br>Notification Letter                           | Recommended               | Recommended                             | Recommended                  | Recommended                             |
| Test Identified EL Students<br>Annually with WIDA ACCESS*               | V                         | ~                                       | ~                            | ✓*                                      |
| Receive Title III Equitable<br>Services                                 | <b>~</b>                  | N/A                                     | ~                            | N/A                                     |
| Reporting Multilingual Learner<br>Students to IDOE via Data<br>Exchange | ~                         | ~                                       | ~                            | Recommended                             |
| Provide <i>Lau</i> -required ELD<br>Services                            | Recommended               | Recommended                             | Recommended                  | Recommended                             |
| Create and Implement<br>Individual Learning Plans<br>(ILPs)             | Recommended               | Recommended                             | Recommended                  | Recommended                             |
| Formal Two-Year Monitoring<br>Process for Exited ELs                    | Recommended               | Recommended                             | Recommended                  | Recommended                             |

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\*If a non-public school chooses to formally identify their ELs, federal guidance allows the option to adopt an ELP assessment of their choosing to do so; however, Indiana state accreditation requires participation in all statewide assessments. This includes WIDA ELP assessments. Therefore, if formally identifying ELs, an accredited non-public school must utilize WIDA ELP assessments.

# Section III: EL Programming Requirements for Public LEAs Regarding Non-Public Schools

The following are key EL programming compliance components as they relate to public LEAs and their relationship with the non-public schools in their geographic boundaries. These will first be defined, followed by a table of what is or isn't required for public LEAs for particular non-public school types.

#### Key Components of EL Programming Requirements for Public Schools Defined

- Offer Initial Consultation: Consultation between the LEA and non-public school officials must include early discussions to prepare for the next school year so that Title III services can be promptly started. To be timely and meaningful, consultation must occur during the design and development of such agency's programs and before the LEA makes any decision that affects the opportunity for eligible non-public school students and educators to participate in Title III services or programs. At this time, non-public schools may or may not choose to participate.
- Offer Ongoing Consultation: Consultation must also be ongoing throughout the school year if the non-public school agrees to Title III services to help ensure effective implementation, service delivery, and assessment of equitable services. (ESEA section 8501(c)(3)). To ensure timely consultation, LEAs, in consultation with non-public school officials, may develop yearly consultation timelines listing the date and location of each meeting along with specific agenda topics.
- Provide Title III Equitable Services: The public LEA will provide equitable services, as applicable, to eligible non-public school students and educators based on the amount of funds generated by the non-public school Title III allocation. An appropriate service plan should be developed during consultation. The LEA may use no more than 2 percent of an LEA sub-grant for administrative costs and indirect costs (Title III, Section 3115[b]b). For more information on providing equitable services, read the Title III section of the Federal Equitable Services Non-Regulatory Guidance.

| Public LEA EL                               | Choice Non-Public School     |   | Accredited Non-Public School |   |
|---|------------------------------|---|------------------------------|---|
| Responsibilities with<br>Non-Public Schools | Participates in<br>Title III | Does NOT<br>Participate in<br>Title III | Participates in<br>Title III | Does NOT<br>Participate in<br>Title III |
| Offer Initial Consultation                  | <b>~</b>                     | ~                                       | ~                            | ~                                       |
| Offer Ongoing Consultation                  | <b>~</b>                     | N/A                                     | ~                            | N/A                                     |
| Provide Title III Equitable<br>Services     | ~                            | Recommended                             | ~                            | N/A                                     |

#### Table 2: Public LEAs' Responsibilities to Non-Public Schools for EL Programming

# Section IV: Non-Public Schools and WIDA Assessments

Indiana Code (IC) 20-32-5.1-7 requires every student enrolled full-time in a public school corporation, charter school, *state-accredited non-public school, or Choice-participant school* in Indiana to participate in statewide assessments.

Additionally, Section 1111(b)(2)(G) of ESEA requires that 100 percent of identified ELs be assessed using the annual ELP assessment until they reach proficiency. ELP assessments determine placement in a protected class under civil rights law. Indiana is a member of the WIDA Consortium and adopted WIDA assessments, which are considered statewide assessments, for the identification of EL students (e.g., WIDA Screener) and their annual assessment (e.g., WIDA ACCESS). For more detailed information on state and federal requirements, please see IDOE's WIDA Assessment Guidance.

If you are an unaccredited non-public school interested in EL testing and identification for Title III funding, please contact the State Ombudsman <u>ombudsman@doe.in.gov</u>.

#### WIDA Assessments in Grades K-12

WIDA develops and provides the ELP assessments administered in Indiana. ELP placement assessments determine initial English proficiency and inform programmatic decisions, such as initial identification of ELs and placement into an EL program. ELP annual assessments are used to determine identified ELs' current level of English proficiency. The annual assessment is used for accountability purposes.

#### **WIDA Screener**

The WIDA Screener aligns with the <u>WIDA English Language Development (ELD) Standards</u>. They are designed to provide an initial measure of a student's ELP across the four domains of Listening, Reading, Speaking, and Writing. Screener scores are reported as language proficiency levels (PLs) for each domain and four composite categories (Oral Language, Literacy, Comprehension, Overall). Language domain PLs report to a "whole" number (e.g., 3.0, 4.0, 5.0), while composite PLs report to a "half" or "whole" PL (e.g., 3.5. 4.0, 4.5).

- <u>WIDA Screener for Kindergarten</u> is the ELP placement assessment for kindergarten and first-semester grade one students. Students in their first semester of kindergarten must only be administered the Listening and Speaking test domains. Kindergarten students assessed in the first semester are not administered the Reading and Writing test domains during the second semester.
- <u>WIDA Screener</u> is the ELP placement assessment for grades one (second semester) through 12. Test forms are divided into five grade-level clusters (Grades 1, 2-3, 4-5, 6-8, and 9-12). The appropriate grade-level cluster form to administer depends on a student's grade level and time of year. Students in the first semester of the beginning grade level of a cluster are administered the previous grade-level cluster form.

Currently, there is no Alternate placement assessment available, though the WIDA Alternate Screener is in development. Potential ELs with significant cognitive disabilities should attempt the WIDA Screener for Kindergarten or WIDA Screener to the extent possible to inform EL identification and placement. Accommodations can be provided, as appropriate.

#### WIDA ACCESS

WIDA ACCESS annual assessments must be administered annually to all identified ELs in kindergarten through grade 12. Results are used to monitor an EL's progress in acquiring proficiency in English across the four domains of Listening, Reading, Speaking, and Writing. Results also determine if a student can exit EL status and be reclassified as fluent.

- <u>Kindergarten ACCESS</u> is the ELP annual assessment for ELs in kindergarten. This paper-based test is composed of performance-based tasks for all four language domains and must be administered to students individually.
- <u>ACCESS</u> (Online or Paper) is the ELP annual assessment for identified ELs in grades one through 12 and is divided into grade-level clusters. The online test is semi-adaptive, meaning students will progress through the test based on their performance on previous items and domains.
- <u>Alternate ACCESS</u> is the ELP annual assessment for ELs in kindergarten through grade 12 with significant cognitive disabilities preventing meaningful participation in the standard ACCESS assessment. This large-print, paper-based test must be administered to students individually.

#### Additional WIDA Assessment Considerations

The following section details the following considerations when screening and testing students: timing, training, and use of funds. It then reviews how WIDA assessments are used to identify ELs as well as exit them from EL status.

#### Timing

The <u>EL identification and placement process</u> for newly enrolled potential ELs must be completed within 30 calendar days of the beginning of the school year or <u>two weeks for students who enroll later in the school year</u>. This includes administering the appropriate WIDA Screener assessment or acquiring recent WIDA assessment results, if applicable. The annual EL assessment, ACCESS, occurs during a set testing window each year. For more information, please refer to IDOE's WIDA Assessment guidance on the <u>IDOE WIDA webpage</u>.

#### **Test Administration Training**

Test Administrators (TAs) are required to hold an instructional, administrative, or school services license granted by IDOE. licensed, teacher. TAs are also required to complete all WIDA training courses for those assessments they administer. Training courses must be renewed every two years, unless otherwise indicated by IDOE. Non-certified personnel may only serve as proctors under the guidance of a TA. For more information, please refer to IDOE's WIDA Assessment guidance on the <u>IDOE WIDA</u> <u>webpage</u>.

#### Use of Title III Funds for Test Administration and Assessment Analysis

Choice and accredited non-public schools participating in Title III may use funds for the screening and assessment of ELs. If, after consultation, it is decided that the non-public school would like the LEA to administer ELP assessments to their students, then the partner LEA may use Title III funds for the following: a) assessment of non-public school students, b) LEA training to non-public school officials on

WIDA assessment administration, and c) analysis of non-public school students WIDA assessment results.

#### Indiana EL Entrance and Exit Criteria

WIDA Assessments provide proficiency levels in listening, reading, speaking, and writing and an overall composite proficiency level. This overall proficiency level determines a student's EL status. Please see Indiana's criteria thorough English Learner Identification and Placement Guidance for detailed information on how students are identified as ELs and how a student can exit EL status through demonstrating proficiency.

# **Section V: Additional Resources**

The following resources are designed to further support use of Title III funds for ELs in non-public schools.

<u>Title III and Non-Public Schools Frequently Asked Questions (FAQ)</u>: An accompanying resource for IDOE's Equitable Services and Title III guidance document.

#### **IDOE Websites:**

<u>Ombudsman Webpage</u>: Ombudsman resources outlining consultation requirements, resources, and all non-regulatory guidance surrounding equitable services.

**IDOE's Office of English Learners and Migrant Education (ELME) Website**: ELME's central location for EL guidance documents and multilingual learner resources.

**IDOE's Office of Assessment Website**: IDOE's Office of Assessment website is home to all state-standardized assessments and resources for testing coordinators.

#### WIDA Resources:

<u>WIDA-Indiana Webpage</u>: The WIDA Indiana consortium member webpage provides information on WIDA assessment administration, including important dates, guidance documents, and contact information for your testing needs. This webpage also includes information on WIDA professional learning opportunities.

**WIDA English Language Development Standards Framework**: Visit WIDA's Standards homepage to find out more about WIDA's standards framework and how best to implement them in your classrooms.

#### U.S. Department of Education (ED) Resources:

<u>Elementary and Secondary Education Act (reauthorized as the Every Student Succeeds Act)</u>: The federal legislation outlining procedures, definitions, and requirements for Title III equitable services. See Section 1111, 3101-3121, 8101 for Title III guidance. See section 8501 for specific non-public Title III guidance.

**Equitable Services Non-regulatory Guidance**: ED publishes non-regulatory guidance outlining all requirements for equitable services in a simplified FAQ format for all Title funding. Specific Title III guidance is on pages 40-43.

#### IDOE EL Resources:

Indiana's English Language Quick Start Guide: This quick reference offers schools a starting point for collaborative conversations surrounding multilingual students to move from compliance to amplifying student learning and participation in schools.

**IDOE's Office of ELME English Learner Guidebook**: IDOE's guidance in for compliance and best practices with identifying, assessing, and providing services for students needing EL services. **Indiana's English Language Program Evaluation Toolkit**: The EL Program Evaluation Toolkit is designed to support LEAs as they evaluate the effectiveness of local EL programs.

<u>Moodle - Indiana English Language Learner Community</u>: This Moodle community includes a number of tools, training, and resources for current school staff.

Indiana English Learners Professional Development Opportunities Calendar: A carefully curated list of in-person and virtual professional development opportunities for English language leaders, staff, and teachers.

# Appendix A: ESEA EL Definition

An English Learner is describe as described in ESEA section 8101 as an individual

- (A) who is aged 3 through 21;
- (B) who is enrolled or preparing to enroll in an elementary school or secondary school;
- (C)(i) who was not born in the United States or whose native language is a language other than English;
  - (ii)(I) who is a Native American or Alaska Native, or a native resident of the outlying areas; and
  - (II) who comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or
  - (iii) who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and
- (D) whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual

(i) the ability to meet the challenging State academic standards;

- (ii) the ability to successfully achieve in classrooms where the language of instruction is English; or
- (iii) the opportunity to participate fully in society.

# Appendix B: Sample Consultation Timeline and Checklist

| Sample Timeline for LEA Consultation with Non-Public School Officials |  |  |  |
|---|--|--|--|
| Month   | LEA Activity   |  |  |
|   | Initiate contact to begin the consultation process.  |  |  |
|   | Inform non-public school officials about Title III programs and services readiness for the <i>upcoming</i> school year.  |  |  |
| July -<br>August  | Review and update EL identification, parental notification, and data reporting<br>procedures. Access the EL Quick Start Guide on IDOE's English Learning and<br>Migrant Education webpage for guidance.  |  |  |
|   | Provide program funding figures to non-public school officials for the upcoming<br>school year, and co-create a plan for fiscal transparency.  |  |  |
|   | Non-public school programs and services have started.  |  |  |
| September   | Consult with non-public school officials about <i>current</i> programs and<br>services implementation and modify as necessary.   |  |  |
|   | <ul> <li>Review validation results for multilingual learner students (e.g., error or<br/>warning notifications)</li> </ul>   |  |  |
|   | October 1: Annual data census reporting deadline   |  |  |
| October   | Continue consultation about <i>current</i> ELD programs and services<br>implementation, including preparations for the WIDA ACCESS testing window.   |  |  |
|   | Consult with non-public school officials about the status of <i>current</i> Title III programs and services  |  |  |
| November  | Check for any new multilingual learner enrollments so that they are reported accurately, including their program of record.  |  |  |
| December  | Obtain a list of all non-public schools with appropriate contact names<br>for later use in mailing "Intent to Participate in Federal Education<br>Programs" forms. <i>Example forms can be found on IDOE's Equitable</i><br><i>Services and Ombudsman website.</i> |  |  |

| Sample Timeline for LEA Consultation with Non-Public School Officials |   |  |  |
|---|---|--|--|
| Month   | LEA Activity  |  |  |
| January   | Continue consultation with non-public school officials about the status of <i>current</i> Title III programs and services.  |  |  |
|   | Send "Intent to Participate" forms to all non-public schools in the LEA<br>with a February deadline for returning the forms.  |  |  |
|   | WIDA ACCESS Testing begins.   |  |  |
| February -<br>March   | Continue consultation with non-public school officials about the status<br>of <i>current</i> Title III programs and services.   |  |  |
|   | Conduct a district-wide consultation meeting with all non-public school officials and provide a general overview of next year's Title III services for qualifying students and educators. |  |  |
|   | Provide non-public school officials with next year's planning document.   |  |  |
|   | Identify students' and teachers' needs, discuss services, staffing,<br>estimated funding figures, program design, and establish priorities.   |  |  |
|   | Evaluate current year Title III programs.   |  |  |
|   | Suggest modifying programs that will be implemented in the <i>next</i> school year.   |  |  |
| April - May   | Continue consultation and planning for programs and services for <i>next</i> school year.   |  |  |
|   | Complete plans for next year's programs and services and set start dates.   |  |  |
|   | Develop next year's consultation timeline.  |  |  |
| June  | Finalize actions related to programs and services.  |  |  |

# Appendix C: Sample Non-Public School Needs Assessment Planning

| Non-Public School:   | Date:        |  |
|----------------------|--------------|--|
| Non-Public Official: | School Year: |  |

| <b>Directions:</b> The categories below are not an exhaustive list but represent targeted talking points for strategic use of funds, present and future English language development services, and to ensure compliance with federal requirements. |  |  |
|--|--|--|
| Non-Public Funding<br>Amount, Plan for<br>Fiscal Transparency  |  |  |
| Multilingual Learner<br>Demographic (e.g.,<br>population size,<br>languages<br>represented, WIDA<br>scores)  |  |  |
| Non-Public Teacher and Staffing  |  |  |
| English Language<br>Programming and<br>Other Services (e.g.,<br>instructional<br>materials)  |  |  |
| Professional<br>Development  |  |  |
| Community and<br>Family Engagement   |  |  |
| WIDA Testing<br>Administration   |  |  |
| Program Evaluation<br>and Additional<br>Needs Analysis   |  |  |