

**PROFESSIONAL WORKING GROUP**  
**Ensuring Access and Engagement for**  
**Students/Parents who are English Learners (ELs)**

**Summary of Recommendations**

The Professional Working Group Ensuring Access and Engagement for English Learner (EL) Students/Parents was a group of District and community agency representatives who convened to discuss and address the District's policies, procedures, and standards for ensuring that English Learner (EL) parents of students with disabilities have meaningful access to information about their child's educational program, including special education and school discipline.

From July 7, 2017, when the District established an electronic translation/interpretation request system, until June 30, 2018, there were:

- 2508 requests for translation/interpretation (these include the robocall requests from the Director of Communication at the board)
- 165 requests for translation of special education documents, these include PTE, NOREP, Progress Reports and Procedural Safeguard Notice and letters.
- 56 IEPs translated
- 88 IEP meetings with interpreters (K-12)
- 69 Early Intervention IEP meetings with interpreters
- The 3 most commonly requested languages were Spanish, Arabic and Swahili.

Students with disabilities are entitled to a free appropriate public education within Pittsburgh Public Schools in accordance with the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act. The parents/guardians of those students are entitled by these and other laws to be meaningful participants in educational decisions about their children. Interpretation and translation services are essential to meeting the needs of EL students and parents. Collaboration between parents, the District's English as a Second Language (ESL) Department, and the Program for Students with Exceptionalities (PSE) is also essential.

Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act (EEOA), as well as Section 4.26 of the Pennsylvania School Code and the accompanying Basic Education Circular, *Educating Students with Limited English Proficiency (LEP) and English Language Learners (ELL)*, require public schools to provide language assistance, including translation and interpretation services, to EL parents and families to assure meaningful access to school programs, activities, and information. Competent translation and interpretation services must be provided by a qualified interpreter in the language best understood by the parent/guardian of the student. For some languages and dialects, the District may be unable to locate a qualified interpreter. In such cases, the District documents its attempts to locate a qualified interpreter.

Professional representatives of the District, Education Law Center, and several other community organizations and agencies met quarterly during the 2016-2017 school year and the first semester of the 2017-2018 school year to discuss the District's current procedures, policies and standards for serving EL families and to develop recommendations for consideration by the School District. Through this collaborative, community-based approach, the District has already begun to implement measures to better anticipate and address the needs of EL families, including hiring a professional to manage translation and interpretation services across the District, training District interpreters about the special education process, and developing new procedures and forms to help streamline communication with EL parents.

Set forth below are the final recommendations of the Professional Working Group Ensuring Access and Engagement for EL Students/Parents for consideration by the Board of School Directors. The recommendations have been prioritized and are identified below by recommendations that have been completed to date, and recommendations that are still in process listed with a target completion date.

## ***RECOMMENDATIONS***

### **RECOMMENDATION #1 -**

#### **Foster effective general communications between EL parents and schools.**

##### Recommendations Completed to Date

- It is recommended that all schools have in place a phone interpretation service which can be utilized as needed to conduct day-to-day communication, meeting interpretation, etc.
- The District will work to ensure that the ESL Department and its staff are available for EL parents who have questions and concerns. All families whose Home Language Survey indicates that a language other than English is spoken in the home, will receive information on how to contact the ESL Department through the Nine-Line contact number. ESL Department staff shall receive additional training in communicating with EL parents, the District's internal policies regarding EL students and EL parents, and cultural competency.
- Schools shall effectively track and utilize the information reported on a student's Home Language Survey (completed during enrollment) in communicating with the student's parent/guardian.
- The ESL Department will improve dissemination of information regarding the District's Nine-Line number. For example, number will be advertised in community spaces such as libraries and businesses, schools will be asked to add

the Nine-Line number to all routine home-school communication that is distributed in the English language, along with other means to improve visibility of this resource to EL parents/guardians.

- The ESL Department will pre-record emergency notifications such as early dismissals and school lockdown information in the most commonly utilized languages/dialects.
- The District shall increase staff available through the ESL Department to support schools in effective communication with EL parents and families.
- The ESL Department shall maintain a practice of conducting one-on-one new student orientations to provide logistical information about school attendance (e.g., start date, ESL teacher(s), school location, and transportation), information on how to receive translation and ESL services, and other information deemed relevant to EL families.
- When any individual has a complaint regarding the provision of translation or interpretation services, or the failure to competently provide such services, a complaint may be made directly to the ESL Department, under the Direction of the Deputy Superintendent. Any complainant bringing forth such a concern retains the right to make a complaint and have it addressed through the procedure included in the District's Nondiscrimination policy (Board Policy 102). The District's Nondiscrimination policy shall be translated in to the top five (5) high incidence non-English languages spoken by District families.

Target Completion Date: June 2019

- District shall consider adoption or revision of a Board policy and/or administrative regulation (AR) which will set forth expectations for effective general communication between EL parents/guardians and District schools. The policy and/or AR will set out timing requirements for translating common documents types, with the timing requirements to reflect the significance and urgency of the documents. This policy will be shared with all school staff and will be available on the District's website.
- The ESL department will improve the consistent provision of qualified interpreters and translators. Interpreters and translators shall be trained, at minimum, in special education law, disciplinary rights and procedures, and the District's policies regarding EL students and EL parents. The scope of training on the above topics shall be delivered at a level appropriate to the fulfilling role of translator/interpreter.

- The District shall put in place a system for evaluating interpreters and translators on an annual basis. This evaluation system shall incorporate feedback from EL parents who have used district translators.
- The ESL Department shall establish a short, standard “welcome message” that can be used when interpreters/translators engage with families, when families enter schools, on District forms and memoranda. The purpose is to establish standard language that the District will routinely use to help families view the school as a welcoming and accommodating environment.

Target Completion Date: June 2020

- The ESL Department will network with one or more school districts to model best practices for general communication between EL parents and schools (e.g., Salt Lake City School District).
- Schools shall provide standard school activity documents and forms (e.g., book fairs, parent/teacher conference nights, PSCC meeting notices) to the ESL Department for translation. Schools may then utilize the pre-translated forms to add in relevant dates/locations for their school activities. The District will maintain a digital warehouse of translated documents that will be available to all staff. School administrators, ESL teachers, and EL liaisons shall receive training on how to access this warehouse.
- Schools shall provide routine school communications to the ESL Department for translation into non-English languages spoken by parents/guardians of the school’s students.
- Schools shall provide school-wide communications that go out on a routine basis (such as the school calendar, school handbook, and classroom calendars) to the ESL Department for translation into the top five (5) high incidence non-English languages spoken by District families.
- The District shall, where feasible, translate essential District-wide information, including but not limited to, enrollment and attendance policies, the Code of Student Conduct, magnet school applications, grievance procedures, notices of non-discrimination, and information regarding gifted and talented programs, into the top five (5) high incidence languages spoken by District families.
- **District Staff Responsible for Implementation of Recommendation #1:**
  - **Office of School Performance**
  - **ESL Department**

## **RECOMMENDATION #2**

**Increase training and engagement opportunities for EL Parents and Families, as well as professional development opportunities for District staff on the rights of EL Students and EL Parents.**

### **Recommendation #2a: Training Opportunities for EL Parents and Families**

#### Recommendations Completed to Date

- The District shall offer at least two (2) basic special education parental rights training sessions each academic year at the site of a community partner, such as the Latino Family Center or similar partner. Trainings shall be co-presented by the District's ESL Department and PSE. In planning training sessions, the District shall invite the collaboration of community partners, such as the Education Law Center, PEAL, or Disability Rights Pennsylvania. The topics and content of these trainings shall be developed in collaboration with and informed by community partners. The training sessions shall be made available in a language parents best understand using interpretation services as necessary. Feedback from community partners will be solicited after each training session to refine training content and delivery method.
- The District shall hold a "Welcome Meeting" for EL parents and families at the start of each school year in order to provide basic information about the District, including logistics, common systems and procedures, and supports for EL families and students. Sessions shall be developed with community input to the greatest extent feasible. Translation and interpretation services shall be provided at these sessions.

#### Target Completion Date: June 2019

- The District will collaborate with community resources, including but not limited to PaTTAN, PEAL, Education Law Center, Jewish Family Community Services, and Disability Rights Pennsylvania, as appropriate.
- The District shall consider strategic locations for community meetings and trainings to generate maximum participation. The District shall ensure all meetings and trainings are well publicized, and that publicity materials are translated and interpreted into the top five (5) high incidence languages spoken by District families.
- Training opportunities shall be written into the Professional Development Plan for both PSE and the ESL Department.

#### Target Completion Date: June 2020

- The District shall develop a digital warehouse of webinar recordings on various parent/family special education training topics, as determined collaboratively

between the ESL Department and PSE with community stakeholder input. Digital webinars will be maintained in the five (5) most commonly translated languages of PPS students and families. Interpretation and translation of webinars can be reviewed and made available upon request. The digital warehouse shall be updated as needed.

- **District Staff Responsible for Implementation of Recommendation #2a:**
  - **ESL Department**
  - **Program for Students with Exceptionalities**

### **Recommendation #2b: Training Opportunities for District Staff**

#### Target Completion Date: June 2020

- The District shall provide training to pertinent staff groups regarding: (1) general translation and interpretation rights of EL students and families, including reference to laws, regulations, District policies and procedures, as appropriate to the role of the staff being trained; (2) the specific rights of EL students and families, and students who qualify for ESL services, in the context of evaluation or provision of special education services;; (4) state and federal requirements regarding EL students and families; (3) best practices for working with EL students and families, as well as translators and interpreters, in a culturally competent manner;
- Training on the topic of serving EL students and families will be integrated to the greatest extent possible with the established schedule of staff professional development opportunities.
- Staff groups for which training will be made available:
  - ESL teachers
  - Student Data Systems Specialists (SDSS)
  - Clerical Staff
  - Principals & Assistant Principals, with the expectation that the training content then be shared with school staff, including school nurses and Division of School Safety staff
  - Office of School Performance/Assistant Superintendents
  - Program Directors
  - Social Workers/Counselors
  - PSE Staff
  - ESL Department Staff, including interpreters and translators
- Non-ESL Center schools shall receive priority in training
- The Office of Human Resources induction program shall provide information regarding the ESL Department, the services it provides to EL students and EL parents and families, and contact information necessary for requesting services that are facilitated through that Department.

- Training will be offered on a rolling basis, but each staff group shall receive training at least once every three (3) years.
- District staff shall embed reference and discussion of the rights of EL students and families into all district trainings, as appropriate (e.g., special education trainings, equity trainings, bullying/harassment trainings, others)
- Training opportunities shall be written into the Professional Development Plan for both PSE and the ESL Department. Training plans shall be monitored to ensure effectiveness.
- **District Staff Responsible for Implementation of Recommendation #2b:**
  - **ESL Department**
  - **Program for Students with Exceptionalities**
  - **Office of Professional Learning**
  - **Office of Human Resources**
  - **Office of School Performance**
  - **Office of Student Support Services**
  - **Law Department**

### **RECOMMENDATION #3**

**Improve structures in place to foster meaningful parental participation of EL parents/families in the District's special education processes.**

#### Recommendations Completed to Date:

- PSE and the ESL Department shall develop a checklist of specific tasks for special education teachers who have English learners on their caseload, including: completion of necessary forms, request of translation/interpretation services, timelines to note so that the ESL Department can provide needed services. Checklists shall be included in the PSE Procedural Manual.
- PSE shall create and institutionalize a form to indicate the mode, mean, and preferred language of communication for parents regarding their child's special education process and related documents.
- The ESL Department shall prioritize translation and interpretation of Permissions to Evaluate, Permissions to Reevaluate and Notices of Recommended Educational Placement (NOREP), so that they are translated and provided to the EL parent/guardian in a timely manner.
- PSE shall submit to the ESL Department the IEP-at-a-Glance of the student for translation. The IEP-at-a-Glance will include the following IEP Sections: Parental Concerns, IEP Goals, Transition Services for Students who are over Age 14, SDI/Modifications, Related Services, and Educational Placement. The parent/guardian of all special education students shall be notified that they have

the right to have the entire IEP document translated into the language they best understand. Parents/guardians who request translation of the entire IEP document will be informed of the anticipated length of time until a translated document is available.

- When an EL student is supported by an IEP, ensure that the student's ESL teacher is a member of the IEP team and should plan to attend all meetings unless excused from attendance by the parent/guardian.
- The District will continue to recruit bilingual evaluators through bi-annual advertisements in appropriate publications.
- The District will provide interpreters/translators with a standardized script to explain to parents/families that they are present at meetings of the multidisciplinary team or IEP team to translate/interpret information in a neutral manner. The statement should make clear that the translator/interpreter is not an advocate for either the District or the family or parent, and that they cannot provide advice. The statement will also confirm that information learned at the meeting will be held in confidence by the interpreter/translator.

Target Completion Date: June 2019

- The District shall create a Board policy and/or administrative regulation setting forth the non-discriminatory special education evaluation process for students whose native language is not English. The policy and/or administrative regulation shall include, at minimum, the following elements:
  - Requirements:
    - Tests and other materials used to evaluate a child shall be selected and administered so as not to be discriminatory on a racial or cultural basis;
    - Evaluations shall be performed by an evaluator who is trained in nondiscriminatory assessment procedures.
  - Evaluation Process:
    - Evaluations shall be provided and administered in the child's native language or other mode of communication unless it is clearly not feasible to do so, and in the form most likely to yield accurate information about the student's strengths and needs;
    - Where the District finds that it is clearly not feasible to offer the services of a qualified bilingual evaluator, the District shall document the efforts it undertook to locate and secure such services. These documents shall be made available to parents, upon request;
    - When it is not feasible to administer standardized assessments in a student's native, non-English language at the time of multidisciplinary evaluation/reevaluation, the below framework



will be used to best inform subsequent educational recommendations.

#### Non-Discriminatory Assessment Guidelines (Ortiz)

##### A Comprehensive Framework for Nondiscriminatory Assessment.

- Assess for the purpose of intervention.
  - Assess initially with authentic and alternative procedures.
  - Assess and evaluate the learning ecology.
  - Assess and evaluate language proficiency.
  - Assess and evaluate opportunity for learning.
  - Assess and evaluate educationally relevant cultural and linguistic factors.
  - Evaluate, revise, and retest hypotheses.
  - Determine the need for and language(s) of formal assessment.
  - Reduce bias in traditional testing practices. Support conclusions via data convergence and multiple indicators
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- When it is clearly not feasible for the District to provide a qualified bilingual evaluator, the evaluation will be completed with the use of a qualified interpreter of the student's native language to the extent consistent with standardization procedures. To be considered a qualified interpreter for the purposes of a special education evaluation, an otherwise qualified interpreter must have additional training on the special education process, the tools and assessments used to evaluate students for special education services, and interpreting in the special education assessment context;
  - If an evaluation is performed with the assistance of an interpreter, this deviation from standard conditions shall be included in the evaluation report and the evaluator shall assess the effects of this variance on the validity and reliability of the information reported to determine whether additional assessments are needed;
  - ELs and Specific Learning Disability Determinations: Delays in the acquisition of academic skills that are the result of limited English proficiency are contraindications of SLD. Students must not be identified as eligible for special education when the cause for academic inadequacies is Limited English Proficiency.

- Rating scales:
  - Rating scales, if appropriate, shall be provided to the ESL teacher for the student being evaluated.
  - Rating scales, if appropriate, shall be interpreted, for parents to ensure full understanding of the function and purpose of such scales.

Target Completion Date: June 2020

- PSE and the ESL Department shall utilize a set of one-page translated summaries of special education documents for EL parents/families, developed and published by a community partner or state/federal agency such as the U.S. Department of Education, PaTTAN, and PDE, to be given to parents/families in addition to the regularly translated documents. Summaries shall be provided in parent-friendly language and shall be translated for EL parents/families.
- PSE and the ESL Department shall monitor and document the translation of special education documents. In instances where the District finds that it is clearly not feasible to provide translation within the time frame allotted and communicated to the school team, the District will provide recorded oral interpretation of the document by the same deadline, and will follow up with written translation as soon as practicable.
- **Individuals Responsible for Implementation of Recommendation #3:**
  - **ESL Department**
  - **Program for Students with Exceptionalities**
  - **Community Partners**

**RECOMMENDATION #4**

**Increase collaborations inside the District and in the broader community to support the rights of EL families and EL students.**

Target Completion Date: June 2020

- Review contracts with out-of-school time and other community partners to add provisions regarding equitable services to EL students, parents and families.
- Increase staff's knowledge of services available to support EL families and students in the community.
- Create a list of outside agencies that exist which may be of assistance to EL families. Ensure this list is well publicized to parents and families and that it is translated into the top five (5) high incidence languages
- Partner with outside agencies serving EL communities in ways that are both effective and cost conscious.

- Create a resource document that outside agencies serving EL communities can use to set forth what the District provides to students who require additional academic, social, behavioral, or language assistance, and instructions with respect to how families can access these District resources.
- The District shall translate and post its Use of School Facilities Policy (Board Policy 807) into the top five (5) high incidence non-English languages to better-enable EL parents to use school buildings to foster positive connections and relationships between families and the District. Upon approval, school facilities could be used for community/cultural events and meeting, ESL classes, community-specific back to school nights, and committee meetings.
- **District Staff Responsible for Implementation of Recommendation #4:**
  - **ESL Department**
  - **Program for Students with Exceptionalities**
  - **Operations Department**

## **RECOMMENDATION #5**

**Enhance capability of District IT Systems to provide schools with immediate access to information needed to serve EL families.**

### Recommendations Completed to Date:

- Provide schools with immediate access to information needed to identify whether a student's Parent/Guardian is an English Learner (EL) and what language and dialect the Parent/Guardian prefers to use in communications with the school.

### Target Completion Date: June 2020

- EL parents/guardians shall be identified in IT Systems as EL even if student does not currently receive ESL services.
- Provide schools, including teaching staff, with immediate access to a "snapshot" of key information on EL students, to include: (1) whether a student is identified as an ESL student; (2) WIDA and similar language proficiency scores; (3) family's preferred language(s) and dialect(s); and (4) fillable space to enter in any other relevant information regarding communication between the school and the family.
- IT System permissions shall be set up to limit availability of the above information to individuals who have a legitimate educational interest (i.e., those who must have the information in order to perform their job functions within the school).

- Ensure adequate training of SDSS and other staff who are responsible for entering information into the student information systems for implementation of the above recommendations.
- **District Staff Responsible for Implementation of Recommendation #5:**
  - **Office of Information Technology**
  - **ESL Department**

## **RECOMMENDATION #6**

**The District will maintain, monitor, and periodically assess the Recommendations set forth herein, while assuring that proper policies and procedures are adopted and maintained to ensure the commitments are put into place.**

Target Completion Date: Ongoing

- The District shall consider adoption of a policy on Access and Engagement for EL Parents/Guardians.
- The District shall work collaboratively with other family-school committees/groups, including the District's Local Task Force on the Right to Education, in order to monitor and periodically assess the effectiveness of the Recommendations set forth herein.
- **District Staff Responsible for Implementation of Recommendation #6:**
  - **English as a Second Language Department**
  - **Program for Students with Exceptionalities**
  - **Law Department**