

Title III Accountability and District Improvement Efforts: A Closer Look

ESEA Evaluation Brief: The English Language Acquisition, Language Enhancement, and Academic Achievement Act

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Improving education outcomes for English Learners (ELs)¹ is a vital policy concern due both to the growing numbers of EL students nationally (4.7 million students in 2007–08)² and to the substantial gaps in achievement between EL and non-EL students. (For the purposes of this brief, the term EL is used to refer to those students who are designated as “limited English proficient” under Title III of the *Elementary and Secondary Education Act [ESEA]*.)

Title III of the *Elementary and Secondary Education Act (ESEA)* provides funds for states, which in turn provide subgrants to

districts³ to develop standards-based programs and strategies for better meeting ELs' needs; Title III then requires states to hold recipient districts accountable for demonstrating improved outcomes for this traditionally underserved population. Because almost 94 percent of ELs in the U.S. attend schools in Title III-funded districts,⁴ the district improvement process under Title III is a potentially promising federal lever for promoting greater achievement among ELs. This policy brief reports on data from interviews conducted with Title III officials in six states and nine districts. The purpose of the interviews was to

Highlights

In a sample of five states and nine districts, some with a long history of serving ELs, and others that have experienced rapid increases in EL enrollments, state and district Title III officials reported:

- Three major benefits associated with Title III implementation and accountability that have facilitated district improvement—1) heightened awareness among state and district stakeholders of the need to address EL concerns; 2) emphasis on the use of data for identifying EL students appropriately and for planning EL programs and services; and 3) professional development, technical assistance, and coordinated services to better address ELs' needs.
- Three major challenges associated with Title III implementation and accountability that may hinder district improvement—1) recruiting staff qualified to teach ELs; 2) promoting a sense of accountability at the school level; and 3) funding EL services.

Another major finding of the data collection indicates:

- States support the district improvement process under Title III by providing technical assistance to districts missing annual measurable achievement objectives (AMAOs), professional development on EL strategies and practices, and coordinated services with Title I.

begin to build a deeper understanding of the supports states provide to districts and the strategies districts are undertaking to improve the education outcomes for ELs. The purpose of the brief is to explore these improvement strategies and to suggest emerging issues for further investigation and policy response.⁵

How are ELs performing?

As reported in *The Biennial Report to Congress on the Implementation of the Title III State Formula Grant Program, School Years 2004–06*, National Assessment of Educational Progress (NAEP) data indicate that ELs have demonstrated improvement in the content areas of mathematics and reading or language arts (U.S. Department of Education, 2008a). However, these NAEP data also indicate that, overall, ELs are struggling to succeed in school and that

there remains a disheartening achievement gap between language minority students and their non-EL peers. For example:

- ◆ Nearly half of fourth-grade ELs (44 percent) scored “below basic” in mathematics (the lowest level), and nearly three-quarters (70 percent) scored below basic in reading.
- ◆ More than two-thirds of eighth-grade EL students scored below basic in mathematics and reading (69 percent and 70 percent, respectively).
- ◆ Whereas 7 percent of fourth-grade ELs scored at or above proficiency in reading in English, 36 percent of non-ELs scored at this level; in mathematics 5 percent of ELs scored at or above proficiency as compared with 33 percent of English speakers (National Center for Education Statistics, 2007, as cited in Hakuta, August, and O’Day, 2009).

Methodology and Data Sources

For this brief, data were collected through state-level and district-level telephone interviews conducted in March–June 2009. The state-level interviews were conducted with Title III staff from six states: Arkansas, California, Indiana, Montana, New York, and North Carolina. The district-level interviews were conducted with nine district Title III officials in five of the selected states, two in each of Arkansas, California, New York and North Carolina, and one in Indiana.

In selecting the state sample, the study team sought to include states with a long history of serving ELs (i.e., California and New York) and states that have experienced a rapid increase in EL enrollments in more recent years (i.e., Arkansas, Indiana, and North Carolina). For the district sample, the study team selected districts that missed AMAO targets for 2 to 4 consecutive years (based on the most recent AMAO data available for each state),* and included districts that varied in size and urbanicity, percentage of the EL population, and composition of the EL population. One consortium of Title III districts was also included in the sample.

The data collection and analysis efforts were guided by six primary questions:

1. What actions do states require of districts missing AMAOs?
2. What supports do states provide to foster the district improvement process?
3. What strategies are districts using to improve EL performance?
4. What are the reported challenges districts face related to Title III accountability?
5. What are the reported benefits of Title III accountability?
6. What is the reported salience of Title III?

Due to the small sample size, and given that each state and district across the United States faces specific challenges, varying contextual issues, and serves a unique EL population, the experiences and perceptions of the state and district officials who were interviewed cannot be generalized to the universe of Title III grantees and districts. Rather, the findings from these interviews can offer insight into how a sample of states and districts experience the district improvement process under Title III—including the benefits and challenges—and provide examples of the strategies some states and districts are using to improve the outcomes of ELs served by Title III.

*During the course of one district interview, the study team learned that the district had missed AMAOs for 2 years, but not 2 consecutive years. (The district missed in 2005–06 and then again in 2007–08.) All of the other districts in the sample had missed at least one AMAO for 2 or more consecutive years.

The implications of these data are substantial:

“Language-minority students who cannot read and write proficiently in English cannot participate fully in American schools, workplaces or society. They face limited job opportunities and earning power.

Inadequate reading and writing proficiency in English relegates rapidly increasing language-minority populations to the sidelines, limiting the nation’s potential for economic competitiveness, innovation, productivity growth, and quality of life” (August and Shanahan, 2006).

What are the strategies for improving ELs’ performance?

The number of studies targeting EL instruction is growing. Emerging research suggests specific strategies that may help improve the achievement of ELs, and a number of states and districts have begun instituting promising practices for better meeting the needs of their English Learners. (See the text box entitled, *Emerging Research on Improving Outcomes for ELs*, on page 4 of this brief for the latest research on best practices for ELs.) In addition, Adequate Yearly Progress (AYP) targets for this subgroup established through Title I and Annual Measureable Achievement Objectives (AMAOs) established through Title III have heightened awareness among key stakeholders at the state, district, and school levels about the importance of focusing attention and resources on this population of students.

Title III Provisions

In 2001, as the number of EL enrollments continued to rise in U.S. public schools, Congress reauthorized the *Elementary and Secondary Education Act of 1965 (ESEA)*, replacing Title VII (the *Bilingual Education Act*) with the current Title III. The reauthorized law abandoned the previous competitive grant-funding structure in

favor of formula grants to states, and placed additional emphasis on providing ELs with the academic supports they need to attain English proficiency and to meet the same challenging and rigorous state academic content and student academic achievement standards that are required of all students.

Title III grants are awarded to states, which in turn award subgrants to districts for the purpose of implementing language instruction programs to develop ELs’ English language proficiency (ELP) and to help ELs meet achievement standards in core subject areas. Although Title III states and districts are not required to implement a specific program of instruction, administer specific assessments, or hire specific staff, the reauthorization of *ESEA* holds them accountable for the outcomes their students attain. Under Title III law, state and district progress is measured against state-established annual measurable achievement objectives (AMAOs), which every district is responsible for meeting annually:

1. AMAO 1: Annual increases in the number or percentage of students showing progress in learning English;
2. AMAO 2: Annual increases in the number or percentage of students attaining English proficiency; and
3. AMAO 3: Making adequate yearly progress (AYP)⁶ for limited English proficient children as described in Title I, Section 1111(b)(2)(B), of *ESEA*.

States are required to establish consequences or actions for districts that have not met AMAOs for 2 or more consecutive years (under Title III, AMAOs only apply to districts or consortia of districts, not schools). The underlying purpose of these accountability mechanisms is ultimately to stimulate activities that better support ELs and increase English proficiency and content knowledge.

Emerging Research on Improving Outcomes for ELs

As EL populations continue to rise in many states, districts, and schools across the nation, educators are eager to learn and implement effective strategies for improving EL outcomes. Although more work is needed in this area and no “silver bullets” have been identified, the research on how ELs may best be supported in the classroom and the conditions that increase their chances of educational success is emerging.

- Research suggests the following about promising practices for ELs:
 1. English language and literacy development in ELs can be promoted by initially learning to read in their first language (August and Shanahan, 2006; Goldenberg, 2008; Hakuta, August, and O’Day, 2009); and
 2. “Effective academic instruction in English for ELs, while similar in many ways to effective instruction for all students, also requires specific adjustments and modifications since students are simultaneously learning academic content as they learn the language in which the content is taught” (Hakuta, August, and O’Day, 2009).
- The Institute of Education Sciences (IES) What Works Clearinghouse practice guide, *Effective Literacy and English Language Instruction for English Learners in the Elementary Grades*, outlines the following five research-based recommendations districts can undertake for improving EL student outcomes in literacy:
 1. Establish procedures (and provide training) for schools to screen English Learners and monitor their progress, using the data to drive instructional decisions;
 2. Provide intensive, small-group reading interventions for at least 30 minutes daily with EL students identified as at-risk for reading failure;
 3. Adopt an evidence-based approach to vocabulary instruction and ensure the provision of extensive and varied vocabulary instruction for ELs;
 4. Adopt a plan that helps teachers develop English Learners’ academic English skills; and
 5. Facilitate and schedule regular peer-assisted learning opportunities during which EL students work in structured pair activities (U.S. Department of Education, 2008b).
- The results of a 5-year evaluation of the effects of the implementation of California’s Proposition 227 on the education of English Learners demonstrated “no clear evidence to support an argument of the superiority of one EL instructional approach over another” (AIR and WestEd, 2006), but did identify key, promising features that lead to successful EL programs and services:
 1. Sufficient staff capacity to address ELs’ needs;
 2. A schoolwide focus on English language development and standards-based instruction;
 3. Shared priorities and expectations for educating ELs; and
 4. A commitment to using systematic, ongoing assessment data to inform decision making (AIR and WestEd, 2006).

Exhibit 1 shows that as of the 2007–08 school year, 10 states reported that 50 percent or more of their Title III districts had missed AMAOs for 2 consecutive years.

In the sample of nine districts selected for this brief, one district had missed AMAO 1, one had missed AMAO 2, and seven had missed AMAO 3 in the 2007–08 school year for 2 or more consecutive years. Whereas no districts in the sample had missed AMAOs 1 or 2 for more than 2 consecutive years, three had missed AMAO 3 (AYP) for 4 consecutive years.

What actions do states require of districts missing AMAOs?

In accordance with the Title III law, the six states selected for this brief require Title III districts that miss one or more AMAOs for 2 or more consecutive years to develop an improvement plan. Title III subgrantees must also, in any year in which they miss one or more AMAOs, notify

parents of ELs participating in Title III or identified for participation in Title III services of the district’s AMAO status. For the states with districts that have not met AMAOs for 4 consecutive years, the accountability actions vary slightly but typically become more intensive.

Actions for missing AMAOs for 2 consecutive years

The six states included in the sample require, as provided for in Title III, that these improvement plans address the AMAOs districts missed. Districts must demonstrate how they analyzed student English language proficiency test data and content test data to identify areas of weakness and the specific needs of their ELs. They must then describe how the activities outlined in their plan will address these issues and the specific AMAOs they missed. For example, the Title III state director in Arkansas explained that Title III improvement plans “have to be data-driven, and the activities and the

Exhibit 1: Percentage of Title III Districts That Missed AMAOs for 2 Consecutive Years, 2007–08 School Year

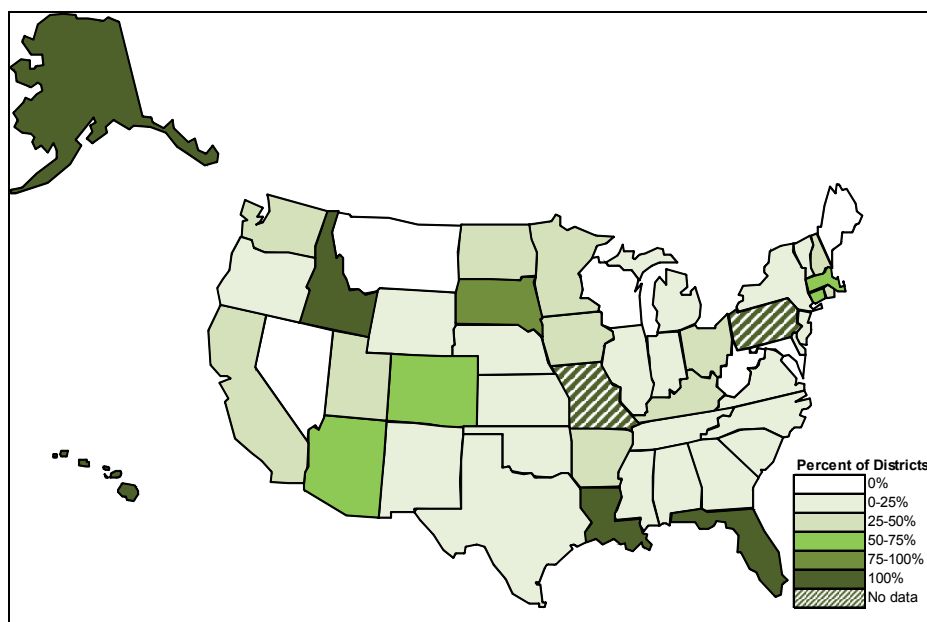


Exhibit Reads: States colored in the darkest shade reported that 100 percent of their Title III subgrantees missed AMAOs for at least 2 consecutive years.

Source: Consolidated State Performance Reports, 2007–08 (n = 50 states and the District of Columbia).

budget must be seamless with regard to addressing [those] data.” A North Carolina district official also described the district’s Title III improvement plan as a “working and breathing document [that] involves administrators, mainstream teachers, curriculum developers, principals, etc. Every school creates a plan that is really based on data, on using their data. Data drives instruction.” The plans are submitted to the state for review and state administrators have established procedures,

At least one district official identified parent notification as a salient consequence of missing AMAOs, suggesting that it can further compel the improvement process.

including on-site monitoring, to ensure districts’ implementation of their proposed plans.

In accordance with the law, the interviewed state officials reported that they ensure districts missing AMAOs for 1 or more years notify parents of students who are receiving or who are eligible for Title III services of which AMAOs were missed, for every year that they are

missed. To assist districts in this process, the states in the sample provide sample notification letters in the most commonly represented languages in the state. North Carolina also provides an AMAO parent resource for districts to disseminate that describes what AMAOs are and why they are important. At least one district official identified parent notification as a salient consequence of missing AMAOs, suggesting that it can further compel the improvement process. She noted that “being put on the list” for not meeting AMAOs for the [EL] subgroup is “always

an issue for districts because then they have [public relations] issues in the community.”

Actions for missing AMAOs for 4 consecutive years

Three of the six states included in the sample, California, New York, and North Carolina, had districts that had missed AMAOs for 4 consecutive years (Arkansas, Indiana, and Montana had not yet had any districts in this situation and had not yet developed formal Title III accountability plans for missing the AMAOs for 4 consecutive years). In these three states, districts that miss AMAOs for 4 consecutive years are typically subject to more rigorous interventions, including the development of an action plan and/or potential modification of instruction or replacement of staff. Although loss of Title III funding is another possible consequence, none of the states in the sample had implemented this sanction in any of their districts.

In California, districts missing AMAOs for 4 years must modify their curriculum or program of instruction and develop an action plan for improving EL performance that reflects the AMAOs that were missed. These plans are developed and submitted using an online system that allows districts to modify and monitor their plans. The online system serves also as a tool through which state officials can monitor district progress and implementation of the action plans. Districts missing AMAOs for 4 years are also assigned a county lead. California has 11 county leads who provide these districts with ongoing support, including support in designing and implementing action plans. The county leads meet with staff from their assigned districts monthly to provide guidance and resolve issues related to Title III accountability.

As an example of such support, one of the interviewed district officials in California described receiving support through intensive

workshops focused on rewriting the district action plan. The district was required to embed an evaluation and monitoring component into the revised action plan. The district also had to develop a system for verifying district EL data that would better allow staff to accurately identify weaknesses in EL instruction and services and propose targeted solutions. Furthermore, a state committee provided feedback to the district upon reviewing the revised action plan, and requested that the district establish a time line for submitting detailed written updates regarding progress in their activities. According to this official, the types of intensive, hands-on support the district received from the state through the county leads “are pieces [of support] that make the development and implementation of any plan much more effective.”

Similar to California, New York requires districts missing AMAOs for 4 consecutive years to write a corrective action plan that details major changes the district will implement to help ensure ELs’ progress and achievement. Such changes may entail modifications to staff, curriculum, and/or instructional materials.

Unlike California and New York, North Carolina does not have specific requirements for districts missing AMAOs for 4 years that differ from those for districts missing for 2 consecutive years. According to state officials, rather than relying on a pre-established set of actions and requirements, the state differentiates support and technical assistance based on the AMAOs each district missed and based on data analyses. Districts missing AMAOs for 2 and 4 consecutive years are expected to conduct a needs analysis using disaggregated student data (e.g., EL data disaggregated by school and grade level). They then are required to submit an improvement plan to the state that outlines the actions the district will take to meet the AMAOs that were missed and to address the weaknesses in ELs’

achievement as revealed through the needs analysis.

What supports do states provide to foster the district improvement process?

A review of the six sampled states’ strategies for supporting the district improvement process under Title III revealed three commonly implemented support activities: (1) technical assistance to help districts identify areas of weakness and strategies for improving outcomes for ELs; (2) professional development focused on strategies for effectively teaching ELs; and (3) coordination with Title I to provide services to districts that have missed AMAOs and are identified for improvement under Title I.

Although the quality of these supports was not examined for this brief, the state and district Title III officials who were interviewed offered their perceptions of the usefulness of these support activities, and of the extent to which Title I and Title III services are synchronized. The information presented below offers some insight

Districts that miss AMAOs for 4 consecutive years are typically subject to more rigorous interventions than districts that miss AMAOs for only 2 consecutive years. Such interventions may include the development of an action plan and/or potential modification of instruction or replacement of staff.

into the sorts of actions six states are taking to specifically support and build the capacity of districts missing AMAOs, as well as the efforts they are undertaking to promote best practices for ELs in districts statewide, regardless of their AMAO status.

Technical assistance to support the district and school improvement process

Interview responses suggest that the states in the sample with a long-standing history of serving ELs, New York and California for example, have established formal systems of support focused on improving outcomes for ELs. These states devote regional staff and resources toward this effort. Arkansas, Indiana, Montana, and North Carolina, states that have experienced rapid growth in their EL population in more recent years, also have begun to establish such support networks.

New York provides assistance through its 14 Bilingual Education Technical Assistance Centers (BETACs), three of which are language-specific (Asian, Haitian, and Spanish). These centers are linked with local universities and are located throughout the state.⁷ The support they provide is available not just to Title III districts that have missed AMAOs, but to Title III districts that have successfully met AMAOs as well as to other local education agencies that may not have Title III programs, but serve ELs. Examples of the types of assistance the BETACs offer include:

- ◆ Assistance on policies and regulations, educational resources, and implementation of higher learning standards related to ELs;
- ◆ Assistance with parent and community outreach programs and activities that are designed to support ELs' success in schools; and

- ◆ Facilitation and organization of professional development opportunities designed to enhance the knowledge and skills of EL educators.

The California Department of Education coordinates with the California Comprehensive Center at WestEd to offer 2-day forums to Title III districts that have missed AMAOs. These forums are required and differentiated for districts that have missed their AMAOs for 2 and 4 consecutive years. During these forums district officials are provided with information and training on using the English Language Learner Subgroup Self Assessment (ELLSSA)⁸ tool to identify weaknesses in their current plan, factors contributing to missing AMAOs, and activities they can implement to help meet AMAOs. Additionally, the state organizes an annual three-day accountability institute focused on ELs that includes several sessions on Title III accountability measures, program support, and strategies for implementing EL programs and services.

In an effort to coordinate services, California also has established a Bilingual Coordinators Network comprised of the 11 largest districts in the state as well as county offices of education. This network meets four times a year and the meetings focus on strategies for meeting the needs of ELs, including issues surrounding Title III implementation and accountability. One district official in California reported that she has been encouraged by the state's implementation of Title III and with the support her district has received. She commented, "The state holds true to the intent of Title III so that processes and procedures do not get in the way of Title III," and that "overall state support has met the district's needs."

Similar to California, Indiana has established an English as a Second Language (ESL) Advisory Group comprised of administrator representatives from urban and rural districts

across the state. The ESL Advisory Group meets throughout the year to share strategies, ideas,

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—District Title III official

challenges and successes, and to develop strategies to meet the education needs of ELs. The district official in Indiana indicated that the Advisory Group has been especially helpful in guiding the district’s implementation of a specific program it is using to support ELs’ literacy development. She has been able to learn from other districts’ experiences.

In Arkansas, technical assistance is focused on helping Title III district officials use data to inform and improve their practices. The state convenes data

summits designed to help districts analyze and interpret their ELP assessment data (pertinent to AMAO 1 and AMAO 2) and benchmark data (pertinent to AMAO 3) in order to identify trends and areas that appear particularly weak. Districts then are expected to incorporate these observations and to identify strategies for addressing areas of weakness in their improvement plans. All Title III districts are included in these Data Summits, regardless of their AMAO status. As indicated earlier, North Carolina state officials try to individualize the assistance they provide to districts. In addition to helping districts that have missed AMAOs write

their improvement plans, state staff are available to all Title III districts on an as-needed and by-request basis. Officials from two districts in the state positively emphasized state staff’s accessibility and responsiveness. One district official reported, “The state provides wonderful support.... [State Title III staff] send good tips and strategies, best practices, and latest studies.... They are spread thin but they provide really wonderful support; we couldn’t ask for better support.”

Professional development focused on supporting EL student achievement

All of the state and district officials who were interviewed for this brief reported that Title III had heightened stakeholders’ awareness of the issues related to instructing ELs. Some officials further indicated that this awareness has resulted in more professional development for educators who serve English Learners. Specifically, there has been a greater emphasis on ensuring instructional staff have the capacity to support not only English Learners’ language development, but also students’ content-area academic success. As one state official noted, “It takes a village to educate a child. One or five [EL] teachers can’t do it alone—everyone has to be trained who is meeting these students and even people who aren’t teaching them, but [who are] in the building need to be involved in the effort.”

Interview responses suggest that districts, rather than the states, are largely responsible for providing ongoing professional development to school-level staff. However, some states, including New York and North Carolina, offer state-wide training on topics specific to teaching English Learners, as described in the text that follows.

New York sponsors five 1-day teacher institutes throughout the school year, and teachers also are provided with tuition assistance to earn their

English as a second language (ESL) or bilingual certification. Bilingual Leadership Academies are another form of professional development designed to build capacity at the local level. The academies aim to develop ESL and bilingual teachers into principals and administrators.

Since 2006, North Carolina has strongly encouraged its schools to implement the Sheltered Instruction Observation Protocol (SIOP) model, which officials believe is one way to support high-quality instruction for ELs in all content areas. The state holds train-the-trainer institutes in an attempt to build capacity at the district and school levels for implementing SIOP, and also uses technology (e.g., 24-hour e-coaching and webinars) to provide ongoing technical assistance and training in the model. In addition to this professional development, which is offered to all districts, North Carolina delivers professional development, specifically for districts and schools that have not met AMAOs. During the 2008–09 school year, this training was concentrated on teaching reading and academic language, areas that were identified as in need of improvement based on data and the AMAOs districts missed.

Although the majority of the district officials who were interviewed expressed satisfaction with the support and professional development offered by their state, district officials in one state indicated that the state-level capacity for supporting districts with high EL populations was under development. They explained that the majority of the EL student population is located in two counties, relatively far from the state capital. Their perception was that state officials' and policymakers' "distance" from the EL population has resulted in a lesser sense of urgency for addressing the challenges associated with improving English Learners' outcomes. The Title III district officials who were interviewed explained that they have had to seek out assistance from recognized experts in the field,

beyond state lines, for guidance and professional development.

Coordination with Title I

For the six states included in the sample, the majority of their EL populations are enrolled in Title I schools and both state and district officials indicated that schools struggling with Title I accountability can make gains by

concentrating more attention and resources on their English Learners. As one state official commented, "The Title I focus and perspective is on the acquisition of core academic skills, and [Title III's focus] is the acquisition of English, but they go hand in hand."

All of the state officials who were interviewed also reported that the alignment and coordination of Title I and Title III services have increased in recent years. Specifically, they described efforts to coordinate the Title I and Title III improvement processes, particularly for districts that have missed AMAOs and also are identified for improvement under Title I. As one example, California reported that in 2007–08 the Title III office worked closely with the Title I office to better align the notification for program improvement status under Title I and Title III, and also to better align the process for submitting improvement plans for the two programs.

Similarly, Indiana's Title I office invites district administrators to technical assistance and

"The Title I focus and perspective is on the acquisition of core academic skills, and [Title III's focus] is the acquisition of English, but they go hand in hand."

—State Title III official

training workshops during which Title I and Title III staff address issues related to their improvement status and to increasing the performance of ELs. According to one district official in this state, Title I and Title III coordination has increased not just at the state level but at the district level. She described a greater level of “commitment and active participation of both programs” toward maximizing Title I and Title III resources. For example, the offices have collaborated to provide professional development in EL strategies for teachers districtwide.

Despite these statements, when state and district officials were probed about the extent to which Title I and Title III offices coordinate services and how often such coordination occurs, Title III officials in four of the five states in the sample indicated that the majority of Title I and Title III coordination is limited to joint or consolidated auditing and monitoring, which may occur only once or twice a year. Additionally, one state official noted that although coordination is growing at the state level, districts in his state “still see a big disconnect between Title I and Title III.”

What strategies are districts using to improve EL performance?

The extent to which Title III has contributed to the district improvement process for ELs is an important policy issue. Although it may not be possible to tease apart whether districts are implementing strategies for addressing the needs of their ELs as a direct result of Title III or whether they would have undertaken such activities regardless of Title III’s existence, the interviewees’ responses indicate that Title III accountability has influenced their decision making concerning EL programming. In four districts, Title III officials indicated that specific strategies were adopted as a result of missing

specific AMAOs. In the other five districts in the sample, Title III officials indicated that the Title III improvement process helped them enhance and refine their already existing programs and services.

The most common strategies for addressing the needs of ELs used across the nine sample districts include:

- ◆ Using data to identify EL students, providing appropriate placements in EL programs, and evaluating services provided to the ELs (nine districts);
- ◆ Establishing instructional supports designed to meet the needs of EL students (nine districts);
- ◆ Incentivizing professional development and teacher endorsement programs (seven districts); and
- ◆ Promoting community involvement and family outreach (four districts).

Using data to identify students for EL programs and evaluate services

All of the district and school officials in the sample indicated that they rely on student assessment data for appropriately identifying students for placement into EL services, and many use data to target evolving individual needs as students receive those services.

Specifically, all nine districts administer newly enrolled students a home language survey to determine if a language other than English is spoken at home. If this is the case, students are “flagged” and are administered a more formal test to determine English proficiency. These results are used to determine the student’s level of reading, speaking, and writing of the English language and to assign students to an appropriately leveled classroom or to place them in a targeted instructional program. Data are then used to monitor students’ progress and to ultimately redesignate EL students as fluent and

proficient in English. For example, in one district, EL students are classified into one of four levels based on these data, with Level 1 indicating the lowest level of proficiency. Level 1 students are provided with the most supports, including a greater number of classes taught by English for speakers of other languages [ESOL]-endorsed teachers. As students graduate to the higher levels of proficiency and eventually exit EL services, the supports they receive decrease.

Some of the districts in the sample also are beginning to use data to evaluate the outcomes of their EL improvement activities and to inform future efforts. One district official reported that she reviewed language proficiency data and the end-of-course scores for EL students. These data indicate that EL students, particularly at the high school and middle school levels are “stuck” and continually receiving low scores on the end-of-course writing exam. As a result, the district is bringing in an expert in the field of ELs to train a team of content-area teachers and will pilot a program in one of its high schools designed to improve the writing skills of ELs. Similarly, due to missing AMAO 3 (specifically high school math) for 2 consecutive years, this same district hand-schedules incoming EL ninth-graders into Foundations of Algebra or Algebra I with select teachers rather than using automated scheduling software. This ensures the students are taught by teachers who have been trained in the Sheltered Instruction Observation Protocol (SIOP) model.

As another example of using assessment data to evaluate the outcomes of services, another district in the sample employs a full-time director of research and evaluation who is responsible for collecting data, analyzing data, and making recommendations about EL programming. Having someone devoted to research and evaluation has allowed the district to conduct comprehensive studies within its English language development program and helped officials determine which instructional practices and programs are best serving their EL

population. For example, district assessment data suggest that ELs placed in dual language classrooms, which consists of 50 percent English instruction and 50 percent Spanish instruction, are the highest-performing ELs by the end of sixth grade. The district also has introduced a staff development program emphasizing systematic English language development, which is being implemented with varying degrees of fidelity at each school site. Assessment data indicate that the teachers, grade-level teams, and schools that implement the program with greater fidelity (e.g., implement all components of the program in compliance with the district’s guidelines and as intended) experience larger gains in their EL’s academic performance.

Establishing instructional supports for ELs

All of the nine sample districts have developed instructional supports targeted to meeting the needs of their ELs. However, these instructional supports range considerably across the sample of districts. The number, availability, and expertise of district- and building-level staff affect how instructional supports for ELs are provided, as does the structure and nature of the schools and the distribution of EL resources, teachers, and students within the district.

Depending on these factors, districts typically implemented at least one or a combination of the following practices:

- ◆ Within-classroom, content-based EL instruction;
- ◆ Push-in support from a specialist who works with ELs within the regular classroom;
- ◆ Pull-out support from a specialist who provides targeted instruction outside of the regular classroom;
- ◆ Formal dual language or bi-literacy programs;
- ◆ Structured English immersion or Sheltered English instruction practices;

- ◆ Out-of-school enrichment programs; and/or
- ◆ Newcomer centers and schools to specifically support recently arrived students.

Incentivizing professional development and teacher endorsement programs

All of the sample districts require professional development for staff working with ELs, and many have established incentives and/or have required teachers to earn their EL endorsement.

District officials described partnerships with local universities and colleges to encourage all teachers, EL and mainstream, to complete EL-related coursework. Five of the nine districts have partnered with local universities to offer coursework for teachers in EL strategies and to graduate students with an EL certification or endorsement.⁹ Other strategies include providing in-service professional development

focused on EL language acquisition and coordinating resources with Title I to provide additional in-service training. One district in Arkansas also is working closely with AmeriCorps to “grow their own” teachers who represent the EL populations in their schools.

In-service professional development is provided by a wide array of individuals.

Title III district staff, EL teachers, coaches, outside consultants, and people from other districts in the state were identified as professional

development providers by district officials. The professional development provided by these individuals is designed typically to address the nature of the district’s EL population and areas of weakness identified by assessment results. It is also often based on which AMAOs the district missed.

One district in Indiana has developed a system for ensuring not only that teachers receive the professional development, but that they are actually applying what they learned in the classroom. According to the district official, this system was established initially due to concerns about veteran teachers’ lack of buy-in for evolving EL instructional practices. In order to address this issue, the district established a two-tier training system in which teachers are first trained in EL strategies and then supervised to ensure they are incorporating the approaches into their daily classroom instruction.

Several of the districts in the sample also are looking to increase building and district capacity by developing their own trainers. By doing so they hope to decrease their reliance on outside consultants and put themselves in a better position to sustain their efforts.

Promoting community involvement and family outreach

In addition to supporting students through targeted classroom instruction, districts are reaching out to the families and the greater EL community by disseminating information about not only school-based supports and activities for the families of ELs, but also about various community resources and organizations that serve their needs.

One district in particular supports recently arrived families through a neighborhood center that provides school and community information in their native language and serves as a point of contact. The district also has Hispanic parent

In the interest of sustainability and less reliance on outside consultants in the future, several districts are looking to increase building and district capacity by developing their own trainers.

liaisons who host a Spanish radio show in order to deliver pertinent information that non-English speaking individuals may otherwise miss. Long-standing partnerships with local Hispanic organizations also help further the district's reach. (See the text box entitled, *The District Improvement Process: The Efforts of One District With Rapid EL Growth*, on page 15 of this brief for additional strategies this district has implemented to support its EL population.)

What challenges do districts face related to Title III accountability?

The interviewed state and district officials reported three challenges associated with Title III accountability that have hindered the district improvement process, in particular:

- ◆ Recruiting and training staff qualified to teach ELs;
- ◆ Promoting a sense of accountability at the school level; and
- ◆ Funding EL services.

Recruiting staff qualified to teach ELs

Most of the state and district officials who were interviewed cited challenges associated with recruiting teachers with the knowledge and skills for teaching ELs, indicating a need for both teachers with the skills to teach English language development and content-area teachers with the skills and training to support ELs in their classrooms.

In two states, officials noted that teacher training and preservice programs do not require ESL coursework and teachers who work with ELs do not necessarily need to have earned an ESL endorsement. As a result, districts with EL populations in these states are tasked with providing this training, often on a year-to-year

basis due to teacher turnover. As one district official stated, "It is an ongoing, never-ending, don't-make-assumptions battle to make sure teachers know what to do on any given day."

In the small sample of nine districts, two rural districts in particular appeared to struggle to recruit and retain teachers qualified to teach ELs. According to one

district official, dual language and certified teachers are frequently more interested in teaching in urban centers. Another district official noted that it is difficult to staff qualified EL teachers at the high school level. Her district typically hires a teacher for four to five periods of regular core content and then encourages them to teach EL classes to fill their course load, with the agreement that they will earn their endorsement in 3 years. However, within 3 years, most of these teachers have left the district.

Promoting a sense of accountability at the building level

The Title III district-level officials indicated that promoting a sense of accountability among building-level administrators and teachers for their EL students' performance is another challenge they have encountered related to Title III accountability, particularly because AMAOs only apply to districts, not schools.

"It is an ongoing, never-ending, don't-make-assumptions battle to make sure teachers know what to do on any given day."

—District Title III official

The District Improvement Process: The Efforts of One District With Rapid EL Growth

The sample included one district that has taken notably proactive steps to improve the outcomes of their rapidly growing English Learner population. District officials have taken it upon themselves to research and seek out support and training from experts in the field, taken steps to coordinate services for ELs, and established partnerships with community-based organizations, all on their own initiative. Although the data collection did not allow for a close examination of the quality of these activities, the information provides insight into one district's response to their changing student demographic.

In 1993, this district served approximately 8,000 students (95 percent of whom were White). Currently, the student population is over 17,000, approximately half of which is EL. This district made concerted efforts to welcome these families and to provide services designed to support their successful transition into the education system.

EL community outreach

Outreach is a cornerstone of the district's efforts to meet the needs of ELs. One district official explained, "At first [we] thought [we] could meet their needs with just a little extra support in the classrooms, but learned quickly that parent involvement [is] necessary." To help engage parents, the district employs two Hispanic parent liaisons who work with all ELs and their families, regardless of language, race, or ethnicity. Besides working directly in the community, the liaisons also host a radio show during which they disseminate information and answer questions from EL families about the schools. The district also has a center for EL families designed specifically for newcomer families and that serves as a point of contact and a source of information and support. By coordinating with the local Hispanic women's organization, the district further remains connected to the community.

Instructional supports

The district has established a focused instructional design model that emphasizes student-to-student interaction and the use of academic language to help develop ELs' proficiency and academic achievement. The district provides bilingual instructional assistants, supplemental materials, and ESL programming during the summer months to further support ELs.

To address the specific needs of adolescent ELs, especially recent immigrants, the district has created a Language Academy. Students in grades 9–12 and who are in their first year in the United States attend the Language Academy. It is taught by three, highly trained core content area teachers (ELA, math, and science). Instruction is delivered primarily in English and the students are immersed in both the language and the content, but in an environment that is safe and nonthreatening.

The district also recognizes the need to support young ELs and better prepare them for a successful academic career. In 2005, the district opened a prekindergarten center specifically targeting families with non-English speaking children. Currently, the center serves about 520 students, and the district hopes to increase enrollment to 600.

Teacher recruitment and training

Finally, the district has undertaken efforts to build the capacity of their teachers to effectively teach ELs. The district expects all teachers to earn their ESL endorsements through a local university or participate in district-sponsored professional development focused on culture, language acquisitions, and instructional strategies for ELs. In the 2008–09s school year, the district had about 400 teachers who had completed the formal coursework, and all 1,230 of the district's teachers participated in 30 hours of the district-sponsored professional development. The district also has hired EL specialists who work specifically with principals and teachers to ensure they are adhering to the requirements mandated under Title III and under Title VI.

As one district official explained, “I think when you get into a system of improvement [for missing AMAOs for consecutive years], our difficulty comes in that most of our schools don’t have subgroups, so you develop a situation where you have building administrators who

“We cannot possibly achieve what is in Title III with the funding provided. But, is it value-added? Absolutely.”
—District Title III official

aren’t highly motivated to implement changes because there isn’t [Title III] accountability at the building level.... I would appeal to the Title III folks to develop ways that that accountability can be transferred down to the school level.”

The consortium of Title III districts included in the

sample has encountered a similar challenge due to the nature of the consortium and the way AMAOs are calculated (data are aggregated so AMAOs are either met or missed at the consortium level not at the individual district level). According to the consortium lead, member districts sometimes drop out of the consortium because they are not willing to face the consequences associated with Title III accountability. The consortium lead stated, “You had these districts, particularly the smaller ones, saying it wasn’t worth the money because of the implications of the accountability. If they did not accept Title III funds then they would not come under the scrutiny of the accountability system for the LEP [subgroup]. Even a district that was eligible for \$15,000 did not want the money, saying it was not worth it, that it was like playing ‘Russian Roulette.’” Moreover, when the district officials in the consortium received the letter reporting that the consortium missed AMAOs, the consortium lead indicated that she

was on the receiving end of these officials’ frustrations. She explained, “Everyone was belligerent and blaming every other district. They just don’t see it as their problem.”

Funding EL services

The interviewed state and district officials consistently perceived Title III as only a small proportion of their districts’ total budget. One district official described Title III funds as “just a drop in the bucket.” For the nine districts described in this brief, the Title III grants ranged from \$133,942 for an EL population of approximately 1,249 students to \$3,670,000 for an EL population of approximately 37,091 students, or \$107 per student and \$98 per student, respectively. These data correspond with the findings of the *State and Local Implementation of the No Child Left Behind Act: Targeting and Uses of General Education Funds* report (Chambers, Lam, Mahitivanichcha, Esra, and Shambaugh, 2009), which indicate that Title III typically provides a supplement of approximately \$100 per EL served. Despite concerns with the amount of funding for ELs, the interviewed officials all indicated Title III was valuable and served to increase stakeholders’ awareness of the needs of English Learners. As one district administrator shared, “We cannot possibly achieve what is in Title III with the funding provided. But, is it value-added? Absolutely.”

Districts officials also reported having access to other funding sources for serving EL students. In addition to Title III, districts draw on Title I funds for EL-related services and programs (especially since Title I schools typically serve the greatest proportion of ELs in a given district), other state funds, and local funds and grants. For example, one district was the recipient of a state-sponsored Refugee Children School Impact Grant that provides some of the costs that local school districts incur by educating significant numbers of refugee children. The grant provides money

for activities and support that will lead to effective integration, such as school-based interpreters and translators and for summer camps. Another district takes advantage of city funds and migrant funds to support after-school programs and tutoring for ELs. In yet another district, a \$1.5 million grant was awarded to a small local college that used the funds to create an ESL certification program from which the district was able to recruit several ESL teachers.

Although *American Recovery and Reinvestment Act of 2009 (ARRA)* funds were not directly appropriated for the Title III program, district officials indicated that the students served under Title III would benefit indirectly from the portion of *ARRA* funds that were appropriated for the Title I program. District officials reported that the majority of their ELs were enrolled in Title I schools so that even if the funds were not specifically used to target services and programs for ELs, ELs would benefit from the other student supports that would be implemented for all students in the schools. However, two district officials in particular were taking a proactive approach to working with Title I staff to devote some of the Title I *ARRA* funds to support ELs. One district official was in the process of negotiating with Title I staff to devote some of the *ARRA* funds to support English classes for parents and an 8-week intensive summer program for incoming EL kindergarten students who did not have previous preschool experience. Another had submitted a proposal for a portion of *ARRA* funds to be used to provide in-depth professional development for secondary school teachers that would include coaching and other capacity-building activities targeted toward meeting the needs of ELs.

What are the reported benefits of Title III accountability?

The district officials who were interviewed for this brief concur that one of the most valuable benefits of Title III accountability is heightened

awareness of the needs of ELs. As one district official in North Carolina stated “[Title III] has brought [EL] kids to the front line and opened up a lot of eyes.” Not only did the legal requirement in *ESEA* to meet the needs of ELs require states to create ELP standards for the first time, but additional benefits reported by some of the interviewed officials include increased awareness among stakeholders for the importance of monitoring EL academic performance over time (as opposed to measuring performance at one point in time), and enhanced and refined classroom instruction for ELs through professional development and teacher collaboration.

In an effort to more accurately track and understand student progress, one district has developed a data management system to better organize, manipulate, and draw meaningful conclusions from their EL data. The data system allows teachers to track an EL student’s achievement longitudinally and according to this official, allow educators to better diagnose student needs and provide parents with important information about how their children are doing. Regarding instructional practices for ELs, another district official noted that since the introduction of Title III her state has seen, “more services to [EL] students and greater ability of teachers to provide supports in the classroom.”

For the Title III consortium in the sample, the Title III grant also enabled opportunities for teachers across districts to come together for the purpose of sharing EL instructional strategies and programs, often through literacy institutes and teacher-led presentations. With this

“[Title III] has brought [EL] kids to the front line and opened up a lot of eyes.”
—District Title III official

collaboration time, teachers in the one sampled consortium of Title III districts developed and implemented a large-scale summer literacy program for their ELs. The consortium lead shared that “[Title III] is a great idea and a good opportunity for teachers. As a consortium, we were able to bring teachers from great distances together to share their experiences.”

What is the reported salience of Title III?

When asked about the salience, or preeminence and “value-added” of Title III, the officials included in our sample frequently compared Title III with Title I. Overall, respondents

indicated that Title I accountability has greater salience than Title III accountability, but that Title III is value-added and that stakeholders are beginning to take the legislation more seriously.

According to one state official, “In terms of districts seeing consequences of

AMAOs, [we] still [have] a long way to go. People don’t take it as seriously as AYP. They look at AYP as a more important accountability system than AMAOs.” On the other hand, many of the Title III officials reported that Title III accountability bolsters Title I accountability. They explained that the overlapping federal requirements for the two programs cause districts to feel that they will be sanctioned twice for the same measure, which provides additional motivation for meeting those AMAOs. Districts

must focus on providing quality programs and services in order to attain the level of EL student performance needed to meet expectations. Furthermore, one state official indicated that the Title III accountability system is more meaningful in terms of EL performance than Title I’s singular focus on content area assessment data. Specifically, this individual commented that AMAOs 1 and 2 provide a “fairer” picture of EL attainment.

Several officials also indicated that the key stakeholders in their districts, including school leaders and instructional personnel, had become aware of the AMAOs by means of professional development and meetings about their district’s performance. They explained that this awareness helps facilitate the improvement process because more individuals are invested in addressing the needs of ELs in order to meet their accountability targets. Another state official commented, “What’s really great is that [Title III] has put this population on the map for accountability. There’s no question about that. It’s been very salubrious to the districts in our state and also at the school-building level that these kids cannot be hidden, they can’t be shunted aside, they can’t be denied services, and the state and district [are] held accountable for their progress.”

Summary

In summary, the interviews with state and district Title III officials suggest that Title III has resulted in some positive actions designed to support ELs’ academic success. States have established accountability actions and consequences for districts that miss AMAOs, and they provide technical assistance and support to these districts to facilitate the improvement process.

“What’s really great is that [Title III] has put this population on the map for accountability.”

—District Title III official

Although recruiting qualified teachers of ELs, promoting a sense of accountability at the school level, and the level of funding for EL services were raised as challenges, the officials who were interviewed also highlighted several benefits of Title III. In particular, officials

reported that Title III has notably heightened awareness of issues related to ELs and focused more attention on their instructional needs. It also has pushed local education agencies to reexamine and reassess their current practices and services for this population of students.

National Evaluation of Title III Implementation

This brief, *Title III Accountability and District Improvement Efforts: A Closer Look*, and its two companion briefs, *Title III Policy: State of the States* and *Title III Accountability: Behind the Numbers*, were written during the early stages of the *National Evaluation of Title III Implementation*, a U.S. Department of Education study being conducted by the American Institutes for Research. These three briefs are precursors to the collection and analysis of nationally representative data and in-depth case study data of Title III-funded districts to examine state and local implementation of Title III standards, assessments, and accountability systems under that evaluation.

The *National Evaluation of Title III Implementation* will provide more in-depth explorations of some of the issues presented in this brief, including analyses regarding:

- The quality of the supports states provide to districts related to the district improvement process under Title III;
- How Title III has affected the district improvement process for ELs;
- The extent to which states and districts differentiate their responses and improvement activities based on the AMAO(s) that were missed;
- The extent to which districts evaluate the effectiveness of their improvement activities on EL outcomes; and
- The extent to which Title III districts struggle to recruit teachers with the skills to teach English language development and content-area teachers with the skills and training to support ELs' academic learning.

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Notes

¹ The term *English Learner* refers to a student whose primary language is a language other than English and whose level of English proficiency is insufficient to support academic learning in a regular classroom in which English is the language of instruction. The *Elementary and Secondary Education Act (ESEA)* uses the term *limited English proficient (LEP)* for such students; however, it has since become more common to use the English learner term. As such, this brief uses English learner to refer to students who require additional instructional supports to fully participate in all-English classrooms until they achieve the requisite level of English proficiency.

² This is an EL count based on the Title I definition of who constitutes an English Learner. States may count ELs differently for Title I and Title III.

³ The term “district” is used throughout this brief in reference to any Title III subgrantee, including consortia of districts receiving Title III subgrants.

⁴ These data are derived from the 2007–08 Consolidated Performance Reports (CSPR) submitted by states.

⁵ This brief is the third in a series of three Title III policy briefs. The first, *Title III Policy: State of the States* provides an overview of state-level implementation of key Title III provisions and highlights emerging issues associated with Title III standards, assessments, and accountability. The second, *Title III Accountability: Behind the Numbers*, provides the most recent data available on the school-age EL population across the

country and states’ and districts’ Title III AMAO status. The briefs in this series were written for a policy audience but appeal to a range of different stakeholders. Each brief has its own focus and features key contextual information related to that focus. Accordingly, multiple briefs may contain similar information.

⁶ Adequate yearly progress (AYP) is a target set by individual states to determine student achievement at the district and school levels regarding achievement of academic standards in reading/language arts and mathematics. Districts and schools must meet annual AYP targets for their student population as a whole as well as for individual subgroups of students, including one subgroup composed of ELs or LEP students.

⁷ The three language-specific centers are located in New York City, but offer services statewide.

⁸ The ELSSA provides districts with a means for analyzing EL outcomes and program services and helps them identify areas they need to strengthen to better ensure the success of their ELs. The state requires all local education agencies that have missed AMAOs for two consecutive years and 4 consecutive years to complete this tool, as well as those LEAs that have been identified for Title I program improvement due to the performance of their EL subgroup. The tool is available online for other districts’ use as well.

⁹ This count does not include the two districts in California where EL certification is a requirement for teachers with ELs in their class.

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