







MN Multilingual Equity Network: EL-ESSA Initiative Reactions and Comments to MDE ESSA Plan August 2017

In July 2016, Coalition of Asian American Leaders (CAAL) and Minnesota Education Equity Partnership (MnEEP) founded the Minnesota Multilingual Equity Network and launched the Minnesota English Learner--Every Student Succeeds Act (EL-ESSA) Initiative. The Initiative created and coordinated conversations within and between advocacy organizations and the, families, and communities that are most impacted by the English Learner (EL) policies and practices of Minnesota school districts. The Network implemented a responsive community engagement process to develop an equity agenda and specific recommendations for the MN Department of Education (MDE) to use when incorporating the educational needs of ELs into Minnesota’s ESSA implementation plan.

In June 2017, the MN Multilingual Equity Network published a [policy brief](#) illustrating the background of Minnesota’s EL population and education, and a set of recommendations to MDE to consider when developing their ESSA plan. In August 2017, MDE released its full ESSA plan for public comment before submission to the US Department of Education on September 18, 2017. Below is a table comparing some of the EL-ESSA Initiative policy brief recommendations and language from the MDE ESSA plan, and our reaction and comment to the provision as it relates to the policy brief recommendation.

Reaction/Comment Key:

-  : MDE accepted Multilingual Equity Network’s EL-ESSA Initiative’s recommendation
-  : MDE did not fully accept Multilingual Equity Network’s EL-ESSA Initiative’s recommendation, or the provision is not finalized
-  : MDE did not accept Multilingual Equity Network’s EL-ESSA Initiative’s recommendation


ESSA Provision	EL-ESSA INITIATIVE Policy Brief Recommendation	MDE ESSA Plan	Multilingual Equity Network Reaction and Comment
1) Target Goals to English Language Proficiency	Use standard ELP target goals for student categories [five years to achieve ELP for elementary students, seven years for middle/high school students, ten years for Students with Limited or Interrupted Formal Education (SLIFE)] and, ideally, develop target goals based on entering language level.	Students receive a growth target for each year along their path to proficiency, set based on the knowledge that ACCESS scores tend to improve faster at lower scale scores than at higher ones. SLIFE will receive one additional year in their timelines if they are at a Beginning or Intermediate proficiency level, but not if	 <i>MDE accepted our recommendation of developing target goals based on standard goals for grade and initial language levels, but the goals are not ambitious or differentiated enough.</i> MN uses standard ELP target goals based on grade level and initial language level: 5-7 years for students at a beginning or intermediate proficiency level and 2-3 years

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		<p>they are initially at an Advanced proficiency.</p> <p>English Language Proficiency goal will be added when data is available after measuring in the 17-18 school year.</p>	<p>for students at an advanced proficiency level. However there is not much differentiation between grade levels and language levels. The Minnesota context should be attributed to EL programs' ability to reclassify, not a state funding framework allowing up to seven years of EL funding.</p> <p>For example, Kindergarteners, at both beginning and intermediate, will have seven years to reach proficiency when research shows it is closer to 4-5 years. Students at a beginning level in grades 9-12 receive seven years in this model when research shows they can achieve proficiency in 5-6 years. Students at an intermediate level in grades 4-8 receive six years in this model when research shows they can achieve proficiency in five years.</p> <p>MDE says trajectories will be adjusted when ACCESS 2.0 data is incorporated. Most likely beginning level will be closer to five years.</p> <p>SLIFE has targets of 7-8 years, which is the lower end of the 7-10 years to proficiency. Many SLIFE enter school in high school and reach the 21 years old cap for staying in traditional school.</p> <p>If a higher population of SLIFE drives the model MDE has proposed, it would be more accurate to develop more accurate and ambitious targets for non-SLIFE ELs and increase the extra time SLIFE receives in the trajectory.</p>
<p>2) Calculation of ELP Indicator</p>	<p>Provide a robust picture of EL progress within the multiple dimensions of ELP by developing a composite indicator with three measurements</p> <ul style="list-style-type: none"> ● % reaching target ● % reclassified ● % LTEL 	<p>The student's points are based on the percentage of their target they reached for the current year. For example, a student who progressed 80 percent of the way from their initial score to this year's target would receive 80 points. A student who meets or exceeds their target for the year receives 100 points. Update annual targets, based on this year's score.</p>	<div style="text-align: center;">  </div> <p><i>MDE surpassed our recommendation of a composite indicator and not measuring the percent of students reaching their target. Students will gain points for how close they reach their annual target.</i></p> <p>MN will use the extent to which a student reaches their target and will update trajectory accordingly. Schools receive credit for how close students reach their target</p>

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		<p>At the school level, the total number of student points is divided by the number of students expected to have a growth calculation that year (that is, those students expected to take the ACCESS test and receive at least their second ACCESS score) who were also enrolled for at least half the academic year.</p>	<p>instead of measuring whether they reach it, and will adjust trajectories by moving to “five years to proficiency” after a student was on the “six years to proficiency” trajectory. This should offer a clearer picture of progress toward ELP.</p> <p>Total score will be an average of students’ percentage of target reached. It is slightly different than the percent of students reaching their target. This measure is similar to the academic achievement index, which replaces percent proficient.</p>
<p>3) Weight: ELP Indicator</p>	<p>Weight ELP indicator as at least 20% of the total ESSA accountability indicators</p>	<p>The academic achievement and English language proficiency indicators are considered to have equal weight to one another and greater weight than subsequent indicators, as low performance on any of them causes a school to progress to the next stage of differentiation.</p>	<div style="text-align: center;">  </div> <p><i>MDE did not adopt our recommendation of weighting ELP at 20% because they are not using weights. ELP is heavily weighted in the funnel system but transparency is unclear for schools not falling in the bottom 5%.</i></p> <p>MN will not weight ESSA indicators to determine an overall school score, but rather use a funnel system with subsequent stages to identify schools for improvement.</p> <p>ELP has equal weight to the academic achievement indicators, but a school may not fall into the bottom percentile in subsequent stages even though their ELP score pushes them to the bottom 25% of schools. It is unclear whether schools that do not move along the funnel system will still receive adequate support for a low ELP score.</p> <p>The normative, relative nature of the funnel sets a low bar because schools will fight to be in the 26th percentile in order to avoid entering or moving through the funnel. If this piece is off, not accurately identifying schools for support, then it is not doing its job of serving ELs and leaves valuable information out.</p>

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<p>4) Weight: Student Groups</p>	<p>For many students of color and American Indian students—a student group that contains most ELs—equity is often hindered by institutionalized assumptions about their academic potential. Assumptions and the barriers they create may force students of color and American Indian students into the lowest levels of achievement.</p>	<p>Equally weighting each student group in a school’s overall performance on each accountability indicator to ensure small groups, often including our disadvantaged students, are meaningfully represented.</p>	<p></p> <p>Minnesota is one of few states equally weighting and establishing equal long-term goals for all student groups. This way, averages are not raised because there are many more white students and so few students of color.</p>
<p>5) Sample Size (N-size)</p>	<p>Standardize the sample size, or n-size, of 10 for the state’s federal accountability system and academic performance reporting, including graduation rates.</p>	<p>Minnesota will use 20 students as the minimum number of students necessary for a group to be included for accountability purposes.</p> <p>Including former English learners increases the number of schools with English learners as a student group.</p>	<p></p> <p><i>MDE did not accept our recommendation of setting the sample size to 10.</i></p> <p>MN has used 20 as the sample size for accountability for several years and will continue to use 10 for reporting purposes.</p> <p>Including reclassified ELs for four years will raise the sample size for a school, but our recommendation is to disaggregate reclassified ELs into a separate group.</p> <p>MN needs to elevate reporting to highlight all schools’ performance for ELs, especially in non-metro area schools.</p> <p>MDE presented data on how many students and schools would be counted with different n-sizes. At 20, only 92% of ELs are counted. Meaningful accountability calls for 95% of students to be counted. “Close enough” should not be good enough.</p> <p>The sample size dictates whether a student group will be measured across all ESSA indicators and hold a school accountable for their performance. All student groups are weighted equally and this is why the sample size is important, because a student group is only incorporated if it meets the sample size.</p>

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<p>6) Tying ELP to MCA</p>	<p>Link ELP with the Minnesota Comprehensive Assessment (MCA) in a manner which considers the limitations of the assessment as a valid, reliable, and sole measure of ELP growth.</p>	<p>With the new standard setting of the ACCESS 2.0, the proficiency group reviewed processes for developing a new definition of English language proficiency based upon students' ACCESS 2.0 scores. Using a decision consistency matrix as well as other measures, the group analyzed several different proficiency scores and the student's ability to successfully access the challenging academic content.</p> <p>Minnesota set a goal to reach a reading/language arts and math achievement rate of 90 with no student group below 85 by the year 2025.</p>	 <p>Minnesota will not use MCA proficiency in exit criteria for EL services, however the long-term goal for MCA proficiency may punish schools for their EL student group not achieving the state goal.</p> <p>Note: the ELP indicator is only based on ACCESS 2.0 proficiency score and whether student is hitting annual targets. And, exit criteria does not include proficiency on MCA.</p> <p>A major concern is for reading and math academic achievement long-term goals: by definition, ELs cannot be proficient on a standardized academic assessment because they are not able to fully access the content. The state set a proficiency score relative to the point where over half of ELs would have the ability to be proficient on the MCA. Requiring ELs to have an achievement index of 85 by 2025 and holding their performance equal to other student groups is punitive to ELs. Relying on reclassified ELs to boost the student group is also punitive because it skews actual performance.</p> <p>This area is the best connection with academic native language assessments and curriculum. If ELs learn content in a language they understand and are assessed in that language, performance may be higher. See policy brief for details and recommendations.</p>
<p>7) Home Language Survey</p>	<p>Standardize Home Language Survey (HLS) to be used consistently across school districts</p>	<p>Newly created <i>Minnesota Language Survey</i> will replace any previous language surveys made by the state or the district</p>	 <p>ESSA requires language survey standardization, and MDE created a standardized language survey to be used across school districts. But, the purpose of the survey is to trigger the English language screener.</p> <p>Stakeholders have consistently said they do not like the survey because of school/district practices. Families often refuse to fill it out</p>

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			<p>correctly because they perceive it will automatically enroll their child in EL services even though they are fluent in English.</p> <p>Although the language in the survey is more inclusive of multilingualism as an asset, the purpose of the survey is still to determine whether a language other than English is present. Law dictates that a student must be screened for English language proficiency if another language is indicated.</p> <p>Although it is clear that parents can refuse EL services, the student will still be marked "EL Y" in MARSS and will still sit for the ACCESS every year.</p>
8) Home Language Survey Rubric	Develop a rubric for teachers and administrators to consistently interpret and respond to HLS responses	Districts and charter schools must use the procedures as published to ensure that all students complete the Minnesota Language Survey	 <p><i>MDE is working to standardize the procedures for administering the Language Survey to ensure there are accurate results and families are engaged.</i></p> <p>Although there is a clear manual for school officials to administer the survey, there must be a commitment to engagement on their part so parents understand its purpose. Family consultation not included in the manual: a verbal, face to face meeting about survey responses and screener is needed. Not just a letter informing the student is in services</p>
9) Screener	Continue the use of screener assessments with the condition that an acclimation period is provided for students to become familiar with computerized testing and the school setting	Moving forward, Minnesota has adopted the WIDA Screener, online and paper, for grades 1-12 and the W-APT or WIDA MODEL for kindergarten. New scores for English proficiency on the state-chosen screeners: Using the ACCESS 2.0 definition of English proficiency approved by the commissioner, the group recommended adopting a similar score of 4.5 with no domain below a 3.5.	 <p><i>Similar practices for the screener will proceed; no acclimation period will occur.</i></p> <p>Because the misperception of entering EL services lies on the language survey, it is important to involve parents in reviewing the screener and deciding whether a student would benefit from EL services.</p>

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<p>10) Exit Criteria: ACCESS score</p>	<p>Use a proficient score on the WIDA ACCESS for ELLs 2.0 assessment</p>	<p>English proficiency on the ACCESS 2.0 would be an overall composite score of 4.5 or higher, with three of the four domains above or equal to 3.5.</p>	<p style="text-align: center;"></p> <p><i>MDE will implement a new proficiency score that allows for more flexibility in domain proficiency.</i></p> <p>Due to a change from ACCESS 1.0 to 2.0 in order to be more aligned to career/college readiness, the test has a higher standard.</p> <p>Having only three of the four domains above or equal to a proficient score allows the flexibility to exit more students because one domain may not be challenging due to language.</p>
<p>11) Exit Criteria: Teacher Judgment</p>	<p>Develop a complementary rubric for teacher judgment to support program exit.</p>	<p>If a student has met the ACCESS proficiency score of at least a 4.5 overall composite score and at least three out of four domain scores of at least 3.5, then schools and districts may consider exiting and reclassifying a student and must use additional criteria (student classroom performance, additional assessment data, and IEP consultation if appropriate) to determine if a student should be retained in EL services.</p> <p>If the evidence collectively suggests that a student would benefit from continued EL services, then that student may be retained in EL services. However, if an LEA decides to retain a student in EL services, then the parents must be consulted and informed about how the decision was made and the data used to retain the student must be documented in the student’s cumulative file.</p>	<p style="text-align: center;"></p> <p><i>MDE is in the process of developing standardized criteria for teacher judgment to support program exit.</i></p> <p>The procedure involves families, but the language states “consulted and informed about how the decision was made.” Families are still not part of the process.</p> <p>While there are standardized procedures and criteria to evaluate exiting a student from EL services, fidelity in implementation will truly determine whether students are accurately reclassified.</p> <p>Lingering question: what classroom teachers are involved, only those in the domain that is below 3.5? Does the EL teacher have input beyond additional assessment data?</p>

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<p>12) Recently Arrived ELs</p>	<p>Assess and report MCA scores on Reading/Language Arts and Math for the first year a student is enrolled, but do not include in the accountability system. In the second year, compare first and second year scores to establish a measure of growth and include this in the accountability system. In the third year, include proficiency in the accountability system like all ELs.</p>	<p>Recently arrived English learners will be expected to take state academic tests during their first year of enrollment. That first year’s results will not be included in accountability calculations. In such a student’s second year of enrollment, their scores will be used when calculating academic progress, but not when calculating accountability. In their third year of enrollment, their scores will be used when calculating both academic progress and academic achievement</p>	<p style="text-align: center;"></p> <p><i>MDE accepted our recommendation.</i></p>
<p>13) Reclassified ELs</p>	<p>Include reclassified ELs for four years in EL student group in accountability systems, but disaggregate their data in reporting.</p>	<p>The addition of reclassified ELs for four years in the English learner student group.</p>	<p style="text-align: center;"></p> <p><i>MDE accepted our recommendation of including reclassified ELs for more time, but it is unclear whether students will be disaggregated as our recommendation states.</i></p> <p>The purpose of including reclassified ELs for up to four years is to monitor their academic progress as a mainstream student. Although a proficient score on ACCESS indicates the student now has the ability to fully access content, the LEAPS Act requires that all teachers support language development. It is also important to determine whether language was the barrier to academic achievement.</p>
<p>14) Additional Equity Focused Provisions</p>	<p>For many students of color and American Indian students—a student group that contains most ELs—equity is often hindered by institutionalized assumptions about their academic potential. If left unchecked, these assumptions and the barriers they create force students of color and American Indian students</p>	<p>Identify and support any public high school with a four-year graduation rate below 67 percent overall or for any student group, ensuring that high overall graduation rates don’t mask student groups below the 67 percent threshold.</p> <p>Maintain a primary focus on the four-year graduation rate but also using a seven-year rate in the</p>	<p style="text-align: center;"></p> <p>Minnesota’s equal weighting of student groups, identifying schools if graduation rates are low for any student group, and extending the graduation rate in measurement all contribute to equity in accountability.</p> <p>It will be up to all levels of education to ensure goals are met and support is implemented to achieve true equity.</p>

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	into the lowest levels of achievement.	accountability and reporting systems to capture all students, including students with disabilities that receive an education until age 21.	
15) Translations of Academic Assessments	Efforts to advance bilingual education in the late 1970s and 1980s were increasingly met with opposition. As a result, ELs are still required to take state academic assessments in the same format and environment as native English-speaking students. This is despite the availability of proven accommodations that provide a more valid assessment of an EL's academic abilities such as test translation, glossaries, and extended testing time.	Beginning in spring 2018, MDE will be able to provide pop-up translations of academic words on the Math and Science MCA in Spanish, Somali, and Hmong.	 <p>It is a win that translations will be available for the top three EL languages, a proven accommodation to provide more valid assessment of ELs' academic ability.</p> <p>However, MDE must make the effort to adequately develop these translations. All three languages have differences in vocabulary depending on country/region. The context in Minnesota should be taken into account when deciding what vocabulary to use.</p>
16) Comprehensive Improvement Plans	Use school improvement and other federal funding sources to strategically strengthen professional development and programs to support ELs and their families, particularly in low-performing schools.	<p>Regional Centers are staffed by specialists with a full range of expertise in English language development and will offer supports through content specialists. Minnesota's list of evidence-based practices will reflect practices in areas reflecting the indicators of the state accountability system, progress towards English language proficiency.</p> <p><i>EL Leadership Institute:</i> works with schools with high EL populations to review EL student achievement and identify how ELs might be better supported.</p>	 <p><i>While there are specialists and a list of evidence-based practices for support, it is unclear how strategic the support will be.</i></p> <p>MDE is developing specialists and evidence-based practices which will be deployed to low-performing schools if identified for support. It is assumed the specialists and practices will address professional development and support to ELs. It is unclear whether families are involved.</p> <p>Lingering question: the EL Leadership Institute could be useful if scaled up, is there a way to adapt it to schools with lower EL populations?</p>
17) Family Engagement	Provide resources and support for family engagement staff to work with EL families in meeting the evolving and diverse educational needs of their children.	If a school decides to retain a student in EL services, then the parents must be consulted and informed about how the decision was made and the data used to retain the student must be	 <p><i>MDE mentions "consulting and informing" the family in exit criteria, however it is after a decision is made, and family engagement is not mentioned much beyond that.</i></p>

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		<p>documented in the student's cumulative file.</p> <p><i>No specific mention throughout the plan</i></p>	<p>Engaging families may strengthen many provisions' probability of success. Discuss the Minnesota Language Survey and screener results with families and explain what EL services will be provided for the student and the family should have an equal voice in a retaining decision rather than be consulted or informed.</p> <p>The original Elementary and Secondary Education Act authorizes funds for parental involvement promotion.</p>
<p>18) Early Childhood Education</p>	<p>Prioritize support and acquisition of federal funding for early development of dual language learner (DLL) students.</p>	<p><i>No specific mention throughout the plan</i></p>	<p style="text-align: center;"></p> <p>The original Elementary and Secondary Education Act, where ESSA is a reauthorization, focuses on K-12. Early childhood education (ECE) encompasses birth to age 8, which is up to 3rd grade.</p> <p>There is not much mention of ECE provisions specific to pre-K, however ESSA authorizes funds that may be used in ECE such as professional development and materials.</p>

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