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ENGLISH LEARNER EDUCATION PROGRAM HANDBOOK

SPRINGFIELD INTERNATIONAL CHARTER SCHOOL

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SICS Mission Statement

The Springfield International Charter School (SICS) is a college preparatory school that provides top-quality education on a non-selective basis to children of different races, religions, nationalities, and backgrounds. It teaches these children to perform to the best of their ability, to achieve academic excellence in a global context, and prepares graduates to attend colleges and universities. The school develops and strengthens students' ethical, moral, and civic values thus molding men and women with the knowledge, skills, and social judgment they will need to face the challenges of the times. The school believes that students with a SICS education, especially in a multicultural setting, will be able to provide leadership throughout the world.

ELE Statement of Purpose

The ELE Department continues to enhance the academic and social experiences of incoming students in the district. Our goal is to ensure that students with limited English language proficiency and English Language Learners are embraced and fully access the general education curriculum. English Language Learners participate in the regular classroom where teachers adapt instruction, materials, and assessments to make grade level content comprehensible. In addition, ESL teachers promote English language development in a one on one or small group setting. The district provides bilingual translators or interpreters, when needed, to facilitate communication between ELL families and the school. SICS seeks to enrich the relationships with their English Learner (EL) families. As a school district and community, Springfield International Charter School strives to recognize, embrace, and welcome multilingual and non-native English speakers from all cultures.

Massachusetts Blueprint for English Learner Success

Vision for English Learner Education

“English learners in Massachusetts attend schools in which all educators share responsibility for their success, engage effectively with their families, and value and nurture their linguistic and cultural assets. English learners are taught by effective, well-prepared, and culturally responsive educators who hold them to high standards and have the resources and professional learning they need to advance students' academic and linguistic development simultaneously. English learners have equitable access to meaningful and rigorous learning opportunities that build on their cultural and linguistic assets and the academic, linguistic, social, and emotional supports they need to excel. English learners thrive in high school and graduate with the knowledge, skills, and abilities necessary to succeed in college and/or a career of their choice, and to contribute to civic life in a global community.

Introduction

English Learners (ELs) are among the most diverse student groups in Massachusetts and across the nation, representing a range of cultural, linguistic, educational, and socioeconomic backgrounds. They bring their school communities a wealth of cultural and linguistic assets, as well as additional cognitive, social, emotional, political, and economic potential.

Education is a basic right of all children in the United States, including students who are ELs. Federal civil rights laws, namely, Title VI of the Civil Rights Act of 1964 (Title VI) and the Equal Educational Opportunities Act of 1974 (EEOA), require schools to take appropriate steps to address the language barriers that prevent ELs from meaningfully participating in their education. Courts and federal guidance have interpreted these provisions to require districts to provide sufficient language and academic supports to enable ELs to become English proficient and meet academic standards in a timely manner. In addition, federal education laws such as the Elementary and Secondary Education Act of 1965 (ESEA), as amended by Every Student Succeeds Act of 2016 (ESSA), address specific requirements for supporting ELs.

The Rethinking Equity and Teaching for English Language Learners (RETELL) initiative in place in Massachusetts since 2011, is a multifaceted approach to addressing the needs of ELs. It is designed to provide ELs access to effective instruction and to close proficiency gaps. A key component of RETELL is SEI training for core academic teachers and career vocational technical teachers of ELs and certain administrators who supervise/evaluate such teachers. RETELL also features the use of the World-Class Instructional Design and Assessment (WIDA) English language proficiency standards and assessment framework and ongoing opportunities for educators and administrators to extend their skills and knowledge related to educating ELs.

On November 22, 2017, Governor Baker signed into law the "Act Relative to Language Opportunity for Our Kids," Chapter 138 of the Acts of 2017, commonly referred to as the LOOK Act, which amended certain sections of G.L. c. 69, 70 and 71A. The law aims to provide districts with more flexibility in determining the design and implementation of English learner education (ELE) programs to meet the needs of ELs, while maintaining accountability for timely and effective English language acquisition.

The purpose of this guidance is to assist districts in developing ELE programs in compliance with federal and state laws

English Learners: Who Are They?

The term “English learner” is defined in the Elementary and Secondary Education Act (ESEA), Section 8101(20), as amended by Every Student Succeeds Act (ESSA) as follows.

The term "English learner," when used with respect to an individual, means an individual—

- A. who is aged 3 through 21;
- B. who is enrolled or preparing to enroll in an elementary school or secondary school;
- C. (i) who was not born in the United States or whose native language is a language other than English;

(ii) (I) who is a Native American or Alaska Native, or a native resident of the outlying areas; and

(II) who comes from an environment where a language other than English has had a significant impact on the individual’s level of English language proficiency; or

(iii) who is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and
- D. whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual —
 - (i) the ability to meet the challenging State academic standards;
 - (ii) the ability to successfully achieve in classrooms where the language of instruction is English; or (iii) the opportunity to participate fully in society.

State law defines the term “English learner” as:

“a student who does not speak English or whose native language is not English, and who is not currently able to perform ordinary classroom work in English.”

Under federal and state law, districts must take appropriate steps to identify ELs so they can receive instruction designed to assist them in learning the English language and subject matter content, and their parents can participate in the decision-making process relative to the type of program the identified ELs will receive. When a new student enrolls in a school district, it is the

district's obligation to determine whether the student is an EL by following appropriate procedures and placing the student in the appropriate instructional program to support content area and English language learning. Districts must also identify Former English learners (FELs) upon their registration in the district and monitor them to ensure that they have meaningful opportunities to participate in the standard instructional program and provide support as needed.

To meet ELs' diverse needs, districts must start by properly identifying students who need English language support. The diagram below provides a process for determining whether a newly enrolled student is an EL. However, districts should consider the student's placement in their previous district and review available documents and the data available in Edwin Analytics for any student transferring from another Massachusetts district. Regardless of the information provided in the new district's Home Language Survey (HLS), districts should place students identified as ELs in their former district in an English Learner Education (ELE) program. ELE services should be provided upon enrollment. Please note that if there is documentation of the student's status as a FEL, then districts should monitor the student's progress for four years.

**State and National Terms Used for English Learner
Programs**

English Language Education (ELE)	Department name
Culturally responsive teaching	<p>Culturally responsive teaching, also known as cultural responsiveness, “asks educators to examine commonly held beliefs about student learning and to use students’ cultural knowledge, prior experience, and frames of reference to create and sustain culturally responsive environments.</p> <p>“Cultural responsiveness is a student-centered pedagogy of thoughtfully and respectfully integrating students’ cultures into all aspects of the learning environment, including, but not limited to, instruction, curriculum, and teacher-student and teacher-family communication. The school and classroom environment are not only equitable and bias free, they reflect students’ cultural identities in order to foster feelings of student safety, belonging, engagement, and intrinsic motivation.” -Cultural Sustainability in our Schools & Classrooms, MA DESE, 2019</p>
Potential EL	A potential EL is a student whose home language survey indicates that there is a language other than English spoken at home by the student or the student’s parents
English Learner (EL)	A student who does not speak English or whose native language is not English, and who is not currently able to perform ordinary classroom work in English (G.L. c. 71A § 2 (d)). The federal definition adds “whose difficulties in speaking, reading, writing or understanding the English language may deny the student the ability to meet state proficiency level on state assessments...or the opportunity to participate fully in society.” (No Child Left Behind Act, Title IX, § 9101 (25)). Also known as English Learner student (Every Student Succeeds Act) and English learner (G.L. c. 71A).
SLIFE	Students with Limited or Interrupted Formal Education (“SLIFE”) are English learners who may have experienced interrupted education or have limited formal education prior to enrolling in the district. SLIFE students usually come from a home in which a language other than English is spoken, have gaps in their education from their home country, and are at least two grade levels behind in reading and mathematics. They may have attended school in the U.S. but can have gaps in language and literacy due to ineffective or missing instruction. They are often at risk for dropping out of school and may need

	<p>intensive support. In some districts, SLIFE students are placed in existing ELE programs, such as SEI or transitional bilingual education, and receive additional support to close the educational gaps in their academic background. Other districts specifically design ELE programs for SLIFE, such as programs that include high intensity English and/or native language acquisition. Districts that wish to start new ELE programs specifically for SLIFE must complete the new ELE program proposal process, while districts that educate SLIFE in existing ELE programs do not.</p>
<p>Formal Schooling</p>	<p>No formal schooling The student did not attend school prior to arriving in the United States.</p> <p>Interruptions in formal schooling Two or more years of interrupted education. The student may have attended school in one location for a length of time, then moved to another location and accumulated a significant amount of time when not attending school.</p> <p>Consistent, but limited formal schooling The student may have attended school in the United States for a length of time then moved to another country. Although education was consistent in duration and length, the student presents with gaps in education. The student completed compulsory education in the native country, yet the native country's school year (duration and daily school hours) is inconsistent with Massachusetts' days per year and hours per day.</p>
<p>Typical Peer</p>	<p>A peer of similar age, socio-economic status, linguistic and cultural background</p>
<p>Caregiver</p>	<p>a broader term and includes any person with whom the child lives who provides daily care to the child, and who acts as the child's 'parent' whether they are biological parents or not. A caregiver can be the mother or father, or another family member such as a grandparent or older sibling</p>
<p>Legal Guardian</p>	<p>a biological or adoptive parent, guardian, or legal custodian with legal authority to make decisions on behalf of the child regarding healthcare and public benefits</p>
<p>Sheltered English Immersion (SEI)</p>	<p>Sheltered English immersion is an English language acquisition process for young children in which nearly all classroom instruction is in English but with the curriculum and presentation designed for children who are learning the language. Books and instruction materials are in English and all reading, writing, and subject matter are taught in English. Although teachers may use a minimal amount of the child's native language, when necessary, no subject matter shall be taught in any language other than English, and children in this</p>

	program learn to read and write solely in English. This educational methodology represents the standard definition of "sheltered English" or "structured English" found in educational literature.
English as a Second Language (ESL) instruction.	ESL instruction provides explicit, direct, and systematic instruction to learn the English language that is intended to promote second language acquisition and English language proficiency. It includes learning outcomes in the four language domains: speaking, listening, reading, and writing. ESL instruction must be tailored to the students' English language proficiency levels. To prioritize language needs, districts may group students of different ages and native language groups within the same ESL classroom. (G.L. c. 71A § 4). ESL instruction should be based on district-level ESL curriculum that is aligned to the Massachusetts Curriculum Frameworks and integrates components of the WIDA ELD standards frameworks.
Limited English Proficient (LEP)	State student classification
Former English Learner (FEL)	Student who received ELE services and has exited the program; student will be monitored for four years after exiting the program
Rethinking Equity in Teaching English Language Learners (RETELL)	A DESE initiative to improve and support the academic achievement of English Language Learners
World-class Instructional Design and Assessment (WIDA)	A multi-state consortium which aims to advance academic language development and academic achievement of linguistically diverse students through high quality standards, assessments, research, and professional development for educators.
WIDA English Language Development (ELD) Standards	An English language proficiency standards framework developed by the WIDA consortium and composed of five standards that represent the social, instructional, and academic language that students need to engage with peers, educators, and the curriculum in schools.
ACCESS for ELs (Assessing Comprehension and Communication in English State-to-State for English learners)	A secure large-scale English language proficiency assessment given to students in Kindergarten through 12th grade who have been identified as English learners (ELs). It is given annually in WIDA Consortium member states (including Massachusetts) to monitor students' progress in acquiring academic English. Testing window typically is January-February.

Initial Identification of English Learners

Springfield International Charter School (SICS) assess all incoming students who identify a language other than English on the Home Language Survey (HLS) upon registration for school in the district per federal and state guidelines. The assessment may also be administered to any incoming student identified as a potential English Learner who does not have obtainable school records from their previous school.

Federal Guidelines

- I. Under Title VI and the EEOA, LEAs must, identify and assess all potential EL students in a timely, valid, and reliable manner
 - A. A potential EL is a student whose home language survey indicates that there is a language other than English spoken at home by the student or the student's parents.

State Guidelines

- I. Districts must screen every newly enrolled student whose HLS indicates that there is a language other than English spoken at home.
- II. Districts must administer a language proficiency screening test when the answer to *any* question on the HLS is a language other than English with the following limited exceptions:
 - A. Students who were previously classified as ELs and were then reclassified as FELs in their former districts
 - B. Students who transferred from another district within Massachusetts or another WIDA state with ACCESS results from the last calendar year.
 - C. The only reason another language is referenced on the HLS is due to the student's enrollment in a world language course.

Springfield International Charter School Guidelines

- I. SICS screens every newly enrolled student who is a potential EL and whose HLS indicates that there is a language other than English spoken at home to align with federal and state guidelines.
- II. SICS administers a language proficiency screening test when the answer to any question on the HLS is a language other than

English with the following limited exceptions:

- A. Students who were previously classified as ELs and were then reclassified as FELs in their former districts
- B. Students who transferred from another district within Massachusetts or another WIDA state with ACCESS results from the last calendar year.
- C. The only reason another language is referenced on the HLS is due to the student's enrollment in a world language course.

SICS considers the student's placement in their previous district and reviews available documents and the data available in Edwin Analytics for any student transferring from another Massachusetts district.

Per state guidance SICS will place students identified as ELs in their former district in an English Learner Education (ELE) program. ELE services will be provided upon enrollment.

If a student is identified as a Former English Learner from another district, then SICS will monitor the student's progress for four years.

Initial Parent Notification and Screening

When students are identified for a screening, SICS must inform their caregivers of the rights they may have regarding English language education (ELE) within the first 10 days of enrollment of school.

SICS informs families that if their child is to be determined an English learner, they have the right to:

- choose an ELE program among those offered by the district as described in state law and regulations;
- visit an ELE program in the district;
- attend available conferences or meetings to learn more about the ELE programs offered in the district;
- request a new ELE program in accordance with state law; and
- withdraw your child from an ELE program.

When SICS screens a student for ELE to determine if they are an English learner and they are found to be eligible for placement in an ELE program, caregivers will receive further notification about their child's English proficiency test results and program placement information.

School districts including SICS must provide notice within 30 days from the beginning of the school year to all caregivers of EL students regarding their identification and placement in a language instruction educational program.

School districts including SICS must, to the extent practicable, translate such notices in a language that the parents can understand. The letter of notification informs the parent or guardian of their right to decline or "opt-out" of EL services at the school. The form to opt-out of the program must be directed in writing to the ELE Coordinator.

Determine EL or Non-EL Status & Make Initial Placement Decisions

Springfield International Charter School uses the results of one of the state-required language screening assessments, namely WIDA Screener for students in grade K-12 using the guidance to interpret the scores provided below to determine whether the student is or is not an EL. The WIDA Screener is to be administered by licensed teachers, who are experienced EL educators and have passed the appropriate WIDA Screener certifications needed to administer WIDA screeners. Interpretation of the screening assessment scores and subsequent decision about whether a student is an EL is made by a licensed ESL teacher or the ELE Coordinator.

Initial Identification of ELs in Kindergarten and Incoming First Grade

Kindergarten students that enroll at the beginning of the school year will take only the Speaking and Listening components of the WIDA K Screener tests. If a student enrolls in the district in the second half of his/her kindergarten year, then the student will take all four components of the test: Listening, Speaking, Reading, and Writing. The results of the screening test will help guide ELE program placement determinations. Students newly enrolled in the first half of Grade 1 will take WIDA K Screener test, as the Screener Test Administration Manual recommends, and SICS will use the cut scores for the second semester of Kindergarten to determine eligibility for ELE services for such students.

Table 1: Initial Identification of ELs in Kindergarten and incoming first grade

TEST	Kindergarten	DOMAINS ASSESSED	Not EL
WIDA Screener for Kindergarten	First Semester	Listening; Speaking	Listening – at least Level 5; AND Speaking – at least Level 5

WIDA Screener for Kindergarten	Second Semester	Listening; Speaking; Reading; Writing	Listening – at least Level 5; AND Speaking – at least Level 5; AND Reading and Writing – at least Level 5 in one domain and at least Level 4 in the other
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Initial Identification of ELs in grades 1-12

Any student who takes the WIDA Screener and scores an overall composite proficiency level **and** a composite literacy (reading/writing) proficiency level of 4.0 or below is an EL and is eligible for ELE services. Only students who achieve a 4.5 composite proficiency level **as well as** 4.5 composite literacy (reading/writing) proficiency level are deemed English proficient.

Table 2: Initial Identification of ELs in grades 1-12

GRADE	DOMAINS ASSESSED	Not EL
1-12	All four	overall composite proficiency level 4.5 or higher and composite literacy proficiency level 4.5 or higher

A student identified as an EL after a language screening assessment must be placed in an English Learner Education (ELE) program to address his or her limited English proficiency so that the student can be provided the opportunity to participate meaningfully and equally in the district’s educational program (603 CMR 14.04). However, the student’s parent may choose to “opt out” of direct language instruction or request a waiver. For more information about making placement decisions for ELs, see the section titled Placement of ELs in Part 3 of this document.

Parent/Legal Guardian Notification

When a SICS student is placed in the EL program, parents/legal guardians are notified of their child's assessment and the services being offered. The reasons for identification of the student as an English Learner are shared with the parents and the student's English proficiency level.

The school will also communicate the ways in which they will support the student in learning English. Parents/legal guardians are also notified of the exit requirements and their right to opt-out. Student's current English language proficiency level will be included.

Three times in an academic school year parents/legal guardians will be sent a progress report from their child's EL educator. The progress report will be, as far as possible, in the student's home language.

Parents/legal guardians may receive the home language survey and the EL parent letter in the home language, if needed. Interpreters and translators are made available to families upon request. Parents/legal guardians will contact either the EL educators, the principal, or ELE Coordinator.

Opt-Out Requests

Parents/legal guardians have the right to opt out of the language program chosen for their child, and other programs for English Learners offered by the district. Federal and state laws require that the district provides a child with support so that they can understand academic instruction taught in English and develop his or her English skills. This means that if a parent/guardian chooses to opt out, the child's teachers will support the child in the regular classroom. But if the parent/legal guardian opts out of language programs, their child will not receive specific English as a Second Language (ESL) instruction focused on language skills. The district believes ESL instruction would help non-native English speakers to learn English and succeed in school and recommend that parents/legal guardians allow their children to be part of our language programs. This type of instruction is especially important if their child is just beginning to learn English or struggles to understand, speak, read, or write in English.

Waiver Requests

Parents must be informed of their right to apply for a waiver and provided with program descriptions in a language they can understand, to the maximum extent practicable. A parent may request a program waiver to allow the student to participate in a different ELE program than the state-mandated sheltered English immersion program model (G.L. c. 71A § 5). Such a waiver may be considered based on parent request, providing the parent annually visits the school and provides written informed consent.

Code all students determined to be ELs correctly in the SIMS data collection and maintain program related records of ELs

Data for the Department's Student Information Management System (SIMS) is collected three times each year (i.e., in October, March, and June). All students identified as ELs should be appropriately coded as "Limited English Proficient (LEP)" on SIMS Data Element DOE025 in all SIMS reports submitted to the Department. The following SIMS Data Elements are also relevant to students identified as ELs:

Table 4: SIMS Codes

SIMS CODES	VALUES	DESCRIPTIONS IN SIMS
DOE021		LEP (EL) Students in their first year in U.S. schools
DOE022		Immigrant status
DOE023		Country of Origin
DOE024		First (Native) Language
DOE025		English Learner.
		Student is an English Learner.
DOE026	00	Not enrolled in an English language education program
	01	Sheltered English immersion - A full day of sheltered grade-level content instruction and English as a Second Language (ESL) instruction. Sheltered content instruction is content instruction that is modified such that an EL student may comprehend it and participate in the class at his or her level of English proficiency. All instruction and materials are in English.

SIMS CODES	VALUES	DESCRIPTIONS IN SIMS
	02	Two-Way Immersion ¹ — A bilingual program designed to promote bilingualism and biliteracy, cross-cultural competency and high levels of academic achievement for both native English speakers and English learners from a single language background.
	03	Other bilingual programs — Other bilingual instructional program for English learners (i.e., not Two-Way Immersion or Transitional Bilingual Education)
	04	EL student whose parent/guardian has opted out of all ELE programs offered in the district.
	05	Transitional Bilingual Education - An instructional program in which the native language of the EL student is used to support the student’s development of English and content learning and is then gradually phased out of instruction as a student’s English proficiency increases.
DOE41	00	Not SLIFE
	01	SLIFE

For more information about how to complete EL-related SIMS Data Elements, see the SIMS Data Handbook available at

<http://www.doe.mass.edu/infoservices/data/sims/SIMS-DataHandbook.pdf> .

Districts must maintain records of each student enrolled in an ELE program. These records may include, but are not limited to, entry/exit information, ACCESS and MCAS scores, screening test documents, reports and progress reports, documentation of monitoring for FELs and opt-out students and documentation of conferences and written communication with the parent

¹ “DOE 026 02” is the SIMS code for Dual Language or Two-Way Immersion programs.

SICS Opt-Out Procedure

Opt-Out Procedures: This request is initiated by parents/guardians upon receiving a parent notification that their student has qualified for ELD support. An opt-out form will be included in the parent notification letter, in both English and the parent’s native language. Once the district is informed that a parent request has been made, the following procedures are implemented:

1. ELD teacher contacts parent, via email or phone call, to confirm opt-out request and explain the ELD program delivery model and benefits to English learners.
2. Additionally, if parent chooses to opt out, the ELD teacher will inform them that the district is required by law to monitor the student’s academic progress and the student is required to participate in the annual ACCESS testing until the student demonstrates English proficiency.
3. An Opt-Out form will be sent home, or a digital form will be sent via email for signature and returned to the ELE Coordinator.
4. The Opt-Out form will be filed in the student’s ELD folder.
5. The ELE Coordinator will change the student’s status to an opt-out student in the Rediker system (School Database).
6. An Opt-Out Monitoring form will also be placed in the student’s ELD folder.
7. All opt-out students will be placed in SEI classrooms until they demonstrate English proficiency and qualify for reclassification as a FEL (see reclassification procedures).
8. Per state requirements, opt out students will be monitored four times a year (at the end of each quarter) during the Opt-Out year. Should a student demonstrate academic struggles, the ELE Coordinator and/or ESL teacher will determine if the issue is related to English proficiency or if other factors are impacting academic achievement. The ELE coordinator and/ or ESL teacher will determine whether the issue is related to English proficiency by reviewing data² and meetings with subject/special education teachers. If the issue is English proficiency, the district will inform the parent that support has been initiated.

² For example: report grades in core subjects, MCAS Scores, F&P levels, Dibels, STAR report etc.,

9. A parent notification (student is an English learner) and an Opt-Out form will be sent home at the start of each school year and the above process repeated until the student demonstrates English proficiency on the annual ACCESS for ELLs state assessment and is reclassified as a FEL via the reclassification procedure.

ELE Programs and Services

After the identification of a student as an EL, the school district must place the student in an English language education (ELE) program. G.L. c. 71A requires that students classified as ELs receive ELE services in a program that will meet their linguistic and academic needs. The requirement to provide ELE services to ELs applies to all districts that enroll one or more ELs.

Districts must prioritize students' linguistic needs when they assign them to an ELE program and plan the level of services students will receive when they first enroll. An assessment screener will produce initial English proficiency information about a student. Districts can develop a more detailed profile after they review the students' previous academic records and monitor their progress. The ELE program provided should incorporate flexibility to make adjustments in service delivery based on the additional data gathered following the initial placement.

Parents of ELs may submit a request to the district for the placement or transfer of their child into a specific ELE program available in the district if the program is appropriate for the age and grade level of the student. The superintendent or the superintendent's designee must review such requests and respond to them in no more than 20 school days after the receipt of the request.

EL parents may also request the implementation of a specific ELE program. When at least parents of twenty ELs submit such a request, districts must provide the parents with a response in no later than 90 days and either offer a plan for the implementation of the requested program or deny the request in writing with an explanation of the denial.

English Learners with Disabilities

Some ELs may have disabilities and qualify for special education services. Language development programming and special education programming are not mutually exclusive and all ELs must receive the services, supports, resources, and programming for which they are

eligible. In other words, ELs are eligible for special education services if they meet IEP eligibility criteria and, conversely, students with a disability are eligible for ELE programming if they are ELs.

For Guidance for Supporting ELs with Disabilities, please see the Department's website at:

<https://www.doe.mass.edu/ele/guidance/disabilities.docx>

Access to Curricular and Extracurricular Programs and Activities

School leaders and teachers are responsible for making the challenging academic standards accessible to students who are learning rigorous academic content while learning the language of the content instruction. Instructional content for ELs must be age-appropriate and standards-based. Districts must award ELs credit that will count towards graduation and promotion upon successful completion of the coursework.

ELs must have equal access to all educational program opportunities and instructional programs or extracurricular activities available within the school for which they qualify. Their level of English proficiency does not determine participation in academic programs and services including career and technical education programs, counseling services, special education services, gifted and talented programs, performing and visual arts, athletics, and any elective classes offered in the school. For instance, unless a particular GATE (Gifted and Talented Education) program or advanced course requires proficiency in English for meaningful participation, schools must ensure that evaluation and testing procedures for GATE or other specialized programs do not screen out ELs because of their limited English proficiency.

Districts must locate, identify, and evaluate ELs who may have a disability in a timely manner and may need special education services or disability-related services under Chapter 71B of the General Laws, the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act of 1973. To avoid inappropriately identifying ELs as students with disabilities because of their limited English proficiency, districts must assess ELs in their native language and in the form most likely to yield accurate results of the student's abilities, unless it is clearly not feasible to do so.

ELs also have a right to receive any guidance and counseling offered by the district in a language they can understand, including, e.g., academic, psychological, college and career counseling as



provided by the school psychologist, school adjustment counselor/social worker, guidance counselor or career counselor.

Districts must ensure that ELs across all levels of language proficiency can access and fully engage with the rigorous grade-level standards.

ELE Programs and Services at SICS

Massachusetts law defines SEI as “an English language acquisition process for young children in which nearly all classroom instruction is in English but with the curriculum and presentation designed for children who are learning the language. Books and instruction materials are in English and all reading, writing, and subject matter are taught in English. Although teachers may use a minimal amount of the child's native language, when necessary, no subject matter shall be taught in any language other than English, and children in this program learn to read and write solely in English.” 7

The English Learner Education (ELE) program in the district is designed to support students whose first language is not English. Students who are screened and found eligible for EL services are placed in the Sheltered English Immersion (SEI) program. The SEI program consists of two components: direct English as a Second Language (ESL) instruction from a certified EL educator, and Sheltered Content Instruction (SCI) from their SEI endorsed core content teachers. These two components of the ELE program provide a comprehensive educational experience for English Learners.

The goal of the ELE program is to help English Learners develop and strengthen their English skills to be successful in the classroom and within the community. Upon completion of the ELE program, students will be able to effectively listen, speak, read, and write in English.

To adequately address the diverse needs of these English learners, EL educators will work with students by adapting a variety of modalities and instructional methods. Push-in and pull-out English support for ELs will be provided. Push-in instruction requires both EL and classroom teachers to work collaboratively to meet individual student needs and classroom learning

objectives. At lower and intermediate levels of English proficiency, students will be “pulled out” to receive more intensive language instruction in EL classrooms.

By providing students with this combination of direct English language instruction and content-based instruction, SICS faculty work to promote student success in the various academic content areas. The following is a more detailed description of the components of the SEI program.

Sheltered English Immersion (SEI)

Sheltered English Immersion (SEI) is a program that incorporates strategies to make content area instruction more comprehensible to EIs and to promote language development. These strategies are used to help students reach proficiency in listening, speaking, reading, and writing English, as well as succeed in core academic subjects. An SEI program consists of two components: English as a Second Language (ESL) instruction and Sheltered Content Instruction (SCI).

English as a Second Language (ESL) classes

The goal of English as a second language (ESL) instruction in Massachusetts public schools is to advance English Learners’ language development and promote their academic achievement. English language proficiency includes social and academic language in listening, speaking, reading, and writing. ESL instruction provides systematic, explicit, and sustained language instruction, and prepares students for general education by focusing on academic language while also attending to social instructional language. Effective ESL instruction supports student success in school, including improvement of ACCESS scores and acceleration of academic achievement. It also supports long-term goals such as college and career readiness. ESL instruction, with its own dedicated time and curriculum, is a required component of any program serving ELs in Massachusetts.

ESL is its own subject matter. The subject matter knowledge required of licensed ESL educators is outlined in 603 CMR 7.00 9

ESL instruction is based on the research, theory, and pedagogy of second language acquisition within the context of the Massachusetts Curriculum Frameworks. ESL is language driven but draws from general education content as the vehicle for language development within a sociocultural context. Language functions and forms targeted during ESL instruction are taught within contextualized and meaningful circumstances.

Although ESL educators must be knowledgeable about academic language across disciplines, they are not expected to be multi-disciplinarians. They cannot be expected to be experts in all content area standards and the full range of corresponding content-specific academic language practices, just as SEI educators are not expected to teach the full range of English language development subject matter. Therefore, the ESL educator should focus on the academic language, common academic habits of thinking (i.e., use evidence to support claims, question evidence, etc.) and analytical practices, and standards that support students across all content areas.

ESL instruction incorporates multiple forms of assessment to gather evidence of students' progress toward standards that focus on speaking, listening, reading, and writing. Any other content (science, math, social studies, etc.) that becomes part of a language assessment is incidental—a context for language instruction and development. ESL assessments are not meant to assess students' content area-specific knowledge or skills. For example, an educator who holds an ESL license can design assessments that measure the academic language of the content areas, but should not assess the content of science, math, English language arts, or other areas that require additional, related teaching licenses.

Sheltered Content Instruction (SCI) Classes

Sheltered Content Instruction (SCI) is content area instruction that integrates sheltering strategies to make content comprehensible and develop academic language needed to successfully master content. English Learners receive sheltered content instruction in math, science, social studies, and ELA that is aligned to the MA Curriculum Frameworks and integrates components of the WIDA Standards. Sheltered content instruction is taught by SEI endorsed content area teachers.

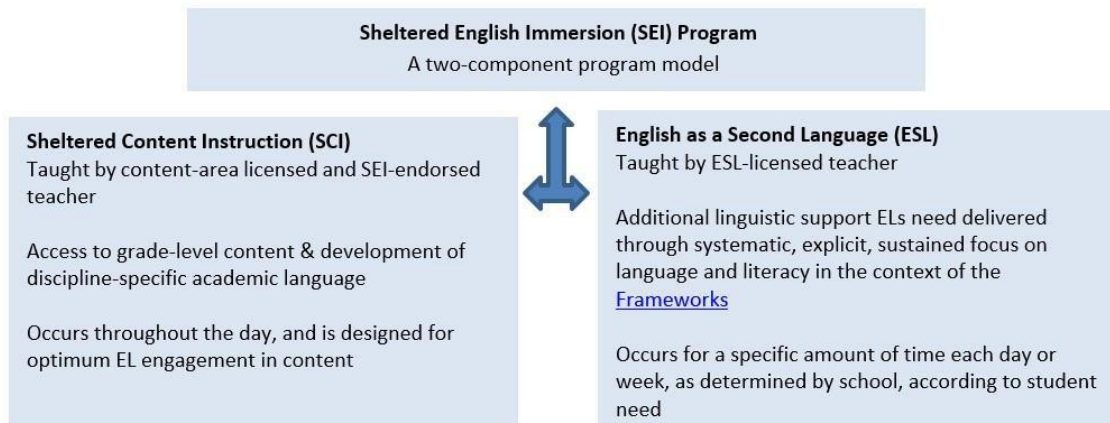
The language development of EL students is the responsibility of both ESL and other academic teachers. Content teachers, in collaboration with ESL teachers, should continue to develop

awareness of the language ELs need to be able to process and produce English to reach high levels of performance in all academic classes. Likewise, all academic teachers need to develop awareness and strategies to support the disciplinary language needs of EL students.

ESL teachers may deliver ESL instruction within the general education classroom in certain instructional settings (such as push-in ESL or co-teaching arrangements), but their primary role should be to provide instruction focused on promoting ELs’ language development. ESL teachers bring expertise in second language development and how to meet language learners’ diverse linguistic, cultural, and academic needs. They must be given the appropriate time, space, and curricular resources to successfully accomplish this task.

SEI Program Defined

In Massachusetts, instruction for ELs in an SEI program is designed around two main building blocks:



Academic Support for EL students

Springfield International Charter School believes that all students, including English Learners, should have access to all district programs. Among these programs are Special Education, Honors/AP Courses, enrichment programs, extracurricular activities, summer school and athletic programs. Participation in supplemental programs such as reading instruction, literacy blocks with students grouped by ability and content area tutors are provided blocks. There is a homework club after school.



Program Placement and Instructional Grouping

Springfield International Charter School is committed to providing full access to the grade-appropriate core curriculum from the start of the EL program while using appropriate language assistance strategies in the core instruction so that EL students can participate meaningfully as they acquire English.

Springfield International Charter School places all LEP students in the Sheltered English Immersion (SEI) program where reading, writing and academic content are taught in English by a SEI endorsed educator. EL students also receive additional language support and services that address the diverse needs of an English learner at varying levels of English proficiency (see table on page 12 for information about proficiency levels). These non-English speakers and/or those in need of participation in a specialized class with an EL educator focus on the four domains of listening, speaking, reading, and writing. Students work with a certified EL educator in a push-in or a pull-out classroom setting for a set period of time during the school week. EL students are provided with a combination of direct English language instruction, and content-based instruction designed to increase their vocabulary and comprehension skills in the academic content areas of math, science, social studies, and ELA. Program services for English learners provide a comprehensive educational experience for each student.

EL curriculum is designed using the WIDA English Language Development (ELD) Standards, WIDA CAN DO Descriptors, and the Understanding by Design Model. Curriculum correlates to the WIDA Proficiency Levels, which represent the language performance of an English Learner (EL) by the end of each given level of English language proficiency.

SICS uses the following common core aligned curriculums in combination with Massachusetts ESL Model Curriculum Units for pull-out ESL classes:

- Elementary (K-5) – National Geographic Reach
- Middle and High School – National Geographic Inside.

There are six levels of English proficiency in the following four domains;

1. Listening
2. Reading
3. Speaking

4. Writing

WIDA Proficiency Levels

Level	Name	Description
1	Entering	Knows and uses minimal social language and minimal academic language with visual support.
2	Beginning	Knows and uses some social English and general academic language with visual support.
3	Developing	Knows and uses social English and some specific academic language with visual support.
4	Expanding	Knows and uses social English and some technical academic language.
5	Bridging	Knows and uses social English and academic language working with modified grade level material.
6	Reaching	Knows and uses social and academic language at the highest level measured by the ACCESS test.

The WIDA ELD Standards center on the language needed and used by ELs to succeed in school. There are five English Language Development Standards.

WIDA English Language Development (ELD) Standards

Standard		Abbreviation
English Language Development Standard 1	English learners communicate for Social and Instructional purposes within the school setting	Social and Instructional Language
English Language Development Standard 2	English learners communicate information, ideas, and concepts necessary for academic success in the content area of Language Arts	The language of Language Arts
English Language Development Standard 3	English learners communicate information, ideas, and concepts necessary for academic success in the content area of Mathematics	The language of Mathematics
English Language Development Standard 4	English learners communicate information, ideas, and concepts necessary for academic success in the content area of Science	The language of Science
English Language Development Standard 5	English learners communicate information, ideas, and concepts necessary for academic success in the content area of Social Studies	The language of Social Studies

The CAN DO Descriptors provide a starting point for working with ELs and serve as a collaborative tool for planning, giving suggested indicators (not a definitive set) in each of the four language domains.

The CAN DO Descriptors have instructional implications; that is, the information may be used to plan differentiated lessons or unit plans.

Using the Understanding by Design format for EL curriculum affords English Learners the same opportunity as their peers to access and demonstrate competency in the Common Core standards appropriate to their grade level.

Instructional Grouping at Different Educational Levels

SICS Springfield International Charter School groups EL/LEP students by grade and level of proficiency. If students attain a language proficiency level and/or demonstrate qualities in support of a general classroom setting, they will enter an inclusion SEI classroom and be provided with push-in support from an EL educator.

The district uses the WIDA English Language Development Standards and proficiency levels, as well as the Common Core standards to design EL instruction and create groupings. Descriptions of the EL program in the district at the different educational levels are as follows:

Elementary

Elementary school students receive instruction for varying lengths of time based upon grouping. EL instruction is a combination of push-in and pull-out services depending on student language proficiency levels. Depending on a student's English proficiency level some students are pulled out of classrooms to receive explicit English language instruction. Others receive push-in services or co-teaching services depending on their strengths and needs. The instructional focus is on English language development regardless of push-in or pull-out service delivery.

EL services at the elementary level are provided by a certified EL teacher who adapts the push-in or pull-out model or a combination of the two into their instruction. EL instruction targets the four domains of listening, speaking, reading, and writing. The curriculum provides differentiated instruction for students at various levels of English language acquisition, aligned with the WIDA ELD Standards and guided by the students' proficiency levels and the WIDA CAN DO Descriptors. It is also aligned with the Common Core Standards used by the mainstream classroom teachers. EL teachers help students build background knowledge and make

connections with skills and concepts that are being taught in their classrooms. EL teachers collaborate with the regular classroom teachers to identify instructional strategies and accommodations to meet the needs of EL students to help them achieve success in the classroom.

Middle School and High School

At the middle school/high school level, EL supports are a combination of push-in and pull-out services.

Equal Access to Academic Programs and Services

The integration of EL/LEP students into the regular education classes, as well as non-core academic classes such as art, music and physical education is a standard policy for Springfield International Charter School. The district ensures that EL/LEP students are taught to the same academic standards and curriculum as all students. Springfield International Charter School uses grade appropriate content objectives for EL students based on the Common Core standards. EL educators provide language objectives aligning with the WIDA Can Do Descriptors for each English language proficiency level in the four domains of listening, speaking, reading and writing.

All EL/ LEP students have access to guidance and nursing services. They also have access to academic support classes. They may elect a full range of curriculum offerings. If demonstrating the qualifying criteria and eligibility is met, EL/LEP students will be included in special education programs. This includes 504 student accommodation plans. Students have the right to receive any guidance or counseling materials in their native languages. Translators are provided to families for these purposes.

Equal Access to Non-Academic Programs

Springfield International Charter School includes EL/LEP students in programs that are nonacademic and/or extracurricular. The district provides EL/LEP students with opportunities to improve their language proficiency and social integration. EL/LEP students will receive notification of non-academic programs and extracurricular activities in their home language where possible. Translators are provided when necessary.



Equitable Facilities

EL/LEP students in the N Springfield International Charter School have access and are fostered by the same facilities, materials, and services as those provided to the general student population.

Annual English Language Proficiency Assessment

Federal and state laws require districts to assess ELs annually to measure their proficiency in reading, writing, listening, and speaking English, as well as the progress they are making in learning English.

ACCESS for ELLs is based on the WIDA English Language Development standards and administered once annually to ELs in K-12 in January-February. It is a standards-based, criterion-referenced English language proficiency test designed to measure ELs' proficiency in English. It assesses social and instructional English used within the school context as well as the language associated with language arts, mathematics, science, and social studies across the four language domains (listening, speaking, reading, and writing). The scores produced by ACCESS for ELLs will identify which proficiency level an EL has achieved at the time of the assessment (mid-year) in each of the single domains of speaking, listening, reading, and writing and the composite areas of literacy, oral language, and overall proficiency.

Following a State mandate, Springfield International Charter School annually assess the English proficiency of all English Learners. Students who have been identified as English Learners take the World-Class Instructional Design and Assessment (WIDA) ACCESS test. Students are assessed in four language domains: Listening, Speaking, Reading, and Writing. Their proficiency is measured in three areas: Linguistic Complexity, Vocabulary and Language Control, with scores ranging from 1.0 (beginning) through 6.0 (reaching) (for a description of proficiency levels see table on page 13)

The test is administered for grades K-12 by a qualified EL educator. The EL educator completes an annual WIDA training that certifies him or her to administer the ACCESS test. The EL educator is also proficient in providing any accommodations to the EL student regarding language needs and/or individual education plans (IEP's) if applicable. A student's IEP is provided each academic year to all educators who teach and service the student.

ACCESS test results partially determine students' programming for the following year, including possible exit from the program. The results are shared with parents/guardians along with a description of the program model. It is recommended that students designated as EL in kindergarten continue to be designated as EL until they complete grade 1 (at minimum), to gather more substantial data on their literacy skills and other data needed to support a reclassification decision, as such SICS will not reclassify a Kindergarten student as a FEL.

Reclassification of ELL students to FEL status

When a student demonstrates proficiency in English, he or she will no longer be classified as an English Learner. Therefore, he or she will be exited from the ELE program and will not be eligible for ELE/Title III services.

Students who are no longer classified as English Learners must be monitored by the district for four years to ensure that they are succeeding academically. The district must provide language support services to such students and/or recommend re-entry to the ELE program if these students struggle to meet grade-level academic expectations due to lack of English language proficiency. Students will continue to receive ELE support services until they meet the following criteria:

- Receive an overall composite score of 4.2 on the WIDA ACCESS and composite literacy score of 3.9 on WIDA ACCESS test.
- Demonstrate the ability to perform ordinary classwork in English.

The ELE department will use a wide range of data to determine whether students demonstrate the ability to perform ordinary classwork in English. The data that will be reviewed includes:

- The student's scores on locally administered reading and other academic assessments, such as DIBELS, F&P Levels, STAR Reading assessment;
- The student's academic grades;
- Report cards;
- The WIDA Performance Definitions which describe the criteria used to define

performance at each WIDA proficiency level, and the CAN DO Descriptors which provide examples of realistic expectations of ELs for each of the four language domains and five levels of English language proficiency.

- The student’s performance on MCAS content area tests if applicable. Students who score a ‘Not Meets’ or below on any of the MCAS tests will not be eligible to be reclassified unless they are currently passing all core content subjects and, if applicable, show that they are currently on grade-level on their STAR reading assessments, DIBELS, and F&P assessment.

Monitoring of FEL (Former English Learner) Students

The Massachusetts Department of Elementary and Secondary Education requires that all districts in the Commonwealth monitor their Former English Learners (FELs) for a period of four years and provide support as needed. Students who have been reclassified as a FEL need to have a Monitoring Form filled out by their teachers in the content areas of English, Math, Science and Social Studies. The ELE Coordinator/ESL will review this form along with report card grades, MCAS scores (if applicable), and other data³. ESL teachers will confer immediately with content teachers if a FEL appears to be struggling in any subject or course.

If a Former English Learner fails to make academic progress, as measured by their grades and content area assessments after their classification as ELs have been removed, and if a school-based team familiar with these students determines that this failure is due to the lack of English proficiency, then Springfield International Charter School will reclassify this student as an English Learner (EL) and start providing English language development (ELD) support. The ELD teacher will notify the parents/guardians of these students and document the bases for the reentry and the parents’ consent to such reentry.

³ Other data could include F&P level, STAR reports, Dibels etc.,

SLIFE Success Plans

As defined by the Department of Elementary and Secondary Education:

“Students with Limited or Interrupted Formal Education (SLIFE) are English learners who have experienced interrupted education or have limited formal education prior to enrolling in the district. SLIFE usually come from a home in which a language other than English is spoken, have gaps in their education from their home country, and are at least two grade levels behind in reading and mathematics. They may have attended school in the U.S. but can have gaps in language and literacy due to ineffective or missing instruction. They are often at risk of dropping out of school and may need intensive support.

A SLIFE student meets all the following criteria:

- The DOE025 SIMS field indicates the student is an English Learner.
- Is 8 to 21 years old.
- Entered a United States school after grade 2, or
- Exited the United States for six months or more and did not attend school during that time.
- Prior exposure to formal schooling is characterized by one of the following:
 - no formal schooling.
 - interruptions in formal schooling, defined as at least two or fewer years of schooling than their typical peers.
 - consistent but limited formal schooling.
 - Functions two or more years below expected grade level in native language literacy relative to typical peers.
 - Functions two or more years below expected grade level in numeracy relative to typical peers.” 16

In SICS, SLIFE students are placed in the existing ELE - SEI program and receive additional support to close educational gaps in their academic background.

Additionally, SLIFE students have a Success Plan. A Student Success Plan (SSP) identifies the student’s language and academic goals. The SSP also establishes how to monitor academic and ELP progress. The SSP describes how the student learns, how the student best demonstrates that learning, and what supports teachers and service providers will provide to ensure the student meets their educational goals.

Benchmark Requirements

English language proficiency benchmarks for ELs support district staff to strengthen student outcomes for ELs. The Department will annually determine the English language proficiency benchmarks for individual ELs and provide them to each district every fall. Meeting benchmarks means that an EL is on track to attain English proficiency within six years of entering a Massachusetts public school. The Department will define and disseminate to districts each fall the English language proficiency benchmarks, or individual targets, for each student’s annual progress toward English proficiency. For more information about benchmark requirements, please see Guidelines for the Use of Benchmarks toward Attaining English Proficiency.

The LOOK Act establishes the following requirements for districts:

- Adopt procedures to identify ELs who do not meet English proficiency benchmarks;
- Establish a process for the district to:
 - identify the areas in which identified ELs need improvement and establish personalized goals for attaining English proficiency;
 - assess and track the progress of ELs who did not meet benchmarks in the identified areas in need of improvement;
 - review resources and services available to assist ELs in the identified areas in need of improvement; and
 - incorporate input from the parents or legal guardian⁴ of the identified EL.⁵

⁴ The term “parent” means “parent or legal guardian” throughout this document.

⁵ [G.L. c. 71A, § 11.](#)

English Learner Individual Learning Plans

SICS Procedures for ESL Success Plans/Individual Learning Plans

In compliance with the LOOK ACT Springfield International Charter School has adopted the following procedure for identifying students who are not attaining their English Proficiency Benchmarks:

- Upon release of the ACCESS scores for the current year (in May), the ELE department will identify students who did not meet their English Proficiency Benchmarks.
- The ELE department in conjunction with general education teachers and special education teachers will complete the ESL ILP form, that includes but is not limited to teacher observation, grades, MCAS scores, and other relevant data (e.g., STAR reports, Dibels, F&P)
- Based upon the information obtained in ESL ILP form and WIDA Can Do Descriptors, the ELE department will write provisional goals for each student along with recommendations for further supports/scaffolds/services to be utilized to help the student achieve their ELP benchmark.
- Copies of the ESL ILP will be emailed or sent to parents (no later than the end of September) who can request a meeting/phone call to discuss the ESL ILP and provide feedback regarding the ESL ILP goals.
- The goals and the ESL ILP will be finalized and copies provided to all stakeholders and service providers.

Licensure Requirements

Springfield International Charter School assures that all teachers attain and maintain professional qualifications to demonstrate proficiency in English language classrooms. This includes but is not limited to the following:

- Educators are literate and fluent in English.
- They hold a teaching or vocational license.
- They receive a passing score on the Communication and Literacy Skills portion of the Massachusetts Test of Educator Licensure.
- They have a bachelor's degree from a college or university where English was the language of instruction.
- All Springfield International Charter School EL teachers hold the appropriate license with the state of Massachusetts.
- The current Department Chair holds licensure in EL as well as Principal/Assistant Principal Licensure and Director/Supervisor Licensure.
- All Administrators who evaluate teachers with EL students in their classes participated in the SEI Administrator course.
- Any core academic teacher who is assigned to provide sheltered English instruction to an EL shall either hold an SEI Teacher Endorsement or is required to earn such endorsement within one year from the date of the assignment.
- Any school district that assigns an EL to a core academic teacher who has a year to obtain an SEI endorsement, shall take all reasonable steps to ensure that such EL is assigned to core academic teachers with an SEI endorsement in subsequent school years.
- Springfield International Charter School will continue to work to communicate with teachers about the SEI training.
- Educators without the endorsement are informed by their building administrators that they need to complete the SEI endorsement.

Parents' Rights, Translation, and Interpretation Services

At SICS every parent/guardian has the right to know about their child's education in the language they understand. Upon enrollment at SICS, a representative will ask about the language a family would like to use when communicating with the school. This helps the school identify language needs so SICS can provide an interpreter or translated documents, free of charge.

SICS will communicate with parents/guardians in their language about important information and opportunities for their child. This includes information about:

- Registration and enrollment in school
- Grades, academic standards, and graduation
- School rules and student discipline
- Attendance, absences, and withdrawal
- Parent permission for activities or programs
- Health, safety, and emergencies
- School closures
- Opportunities to access programs or services—including advanced placement and English learner programs
- Special education and services for students with disabilities

Meetings with School Staff

When making an appointment to meet with teachers or school employees, the school will offer an interpreter if needed. This includes parent–teacher conferences, meetings about special education, or any other conversations about your child's education. SICS will use interpreters who understand any terms or concepts that will be used during the meeting. The school will not use students or children as interpreters.

The interpreter will be neutral and should communicate everything said during the conversation. They will not omit or add to what anyone says. The school will make sure interpreters understand their role and the need to keep information confidential. The interpreter might be in-person, virtual, or over-the-phone and may be a SICS freelancer or contractor.

Written information

SICS will translate important written information into the most common languages spoken in your school district. If you receive information that is not in your language, please let the school know if you would like it translated or explained orally in your language.

In-School Interpretation Requests

- Interpretation requests should be submitted a **minimum of 2 weeks** prior to the date of the meeting.
- Interpretation services are available for both General Education and Special Education events, including but not limited to parent-teacher meetings, student conferences, screenings, Individualized Education Plan (IEP) & 504 meetings, school enrollment, dissemination of information specific to school activities and programs, etc.
- In emergency instances (e.g., medical emergencies, criminal activities, etc.) ASL interpretation services can be requested via MCDHH with less than 24 to 48-hour notice, but the fulfillment of said request is not guaranteed.
- Special Education meetings (i.e., IEP & evaluations) should be requested at the earliest known date of the meeting to secure services.
- To eliminate the number of interpretation cancellations or no-shows, event organizers do the following:
 - Confirm parent attendance two days before the scheduled event.
 - If a parent is not attending, promptly inform the interpreter and the ESL Coordinator, Mrs. Kelsall, of the cancellation. **Depending on the contractor/agency being used, Cancellation confirmations need to be confirmed 24 hours before the date/time of service to not be charged.**

In- School Written Translation Requests

- Translation Requests can include, but are not limited to, School Event Flyers, Letters, Report Cards, Progress Reports, Testing Information, etc.
- Translation requesters should allow at minimum a 2-week delivery date on request, bearing in mind that larger jobs will, correspondingly, take longer to complete (including specific languages). In addition, the return date is based on the number of items in the translation queue.
- Translation requests should be submitted in Microsoft Word format. Any other format submission may not be accepted or may cause delays.
- Scanned copies will not be accepted.
- SICS in-house translation staff will not format documents submitted for translation.
- Instructional materials i.e., test, quizzes, homework will not be translated.
- Translation Request should be for **“Essential Information” only.**

- With every request, the ESL Coordinator and/or Designee will determine whether the services sought are the most appropriate to fulfill language access and may tailor the request accordingly.