

District U-46: An Examination of Language Education Policies at the Secondary Level

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Federal Legal Policies Regarding ELL Students

The federal guidelines and requirements surrounding ELL education are open ended. The Office of Civil Rights (OCR) is responsible for enforcing the laws that state students must be provided equal access to all areas of education, despite language barriers. However, as stated on the U.S. Department of Education website:

“OCR does not require or advocate a particular program of instruction for ELL students and nothing in federal law requires one form of instruction over another. Under federal law, programs to educate children with limited proficiency in English must be: (1) based on a sound educational theory; (2) adequately supported so that the program has a realistic chance of success; and (3) periodically evaluated and revised, if necessary.”

There are a wide range of educational theories and practices, as well as circumstances within school districts. This flexibility allows districts and individual schools to run programs that best meet student needs within their communities. However, there have been several updates to these policies, one such being the 1991 OCR policy memorandum, cited on the U.S. Department of Education website, which requires teachers to be certified either with an ESL designation or bilingual, dependent upon the program in which they are teaching. There is also a stipulation within the 1991 OCR policy memorandum that states:

“If a recipient has shown that it has unsuccessfully tried to hire qualified teachers, it must provide adequate training to teachers already on staff to comply with the Title VI regulation. See *Castaneda*, 648 F. 2d at 1013. Such training must take place as soon as possible. For example, recipients sometimes require teachers to work toward obtaining a credential as a condition of employment in a program for limited-English-proficient

students. This requirement is not, in itself, sufficient to meet the recipient's obligations under the Title VI regulation. To ensure that LEP students have access to the recipient's programs while teachers are completing their formal training, the recipient must ensure that those teachers receive sufficient interim training to enable them to function adequately in the classroom, as well as any assistance from bilingual aides that may be necessary to carry out the recipient's interim program."

Illinois Legal Policies Regarding ELL Students

According to the Illinois State Board of Education, Illinois law requires at least one of two main types of ELL programs, dependent upon the number of ELL students within the school who speak the designated non-English language (ISBE). The first is Transitional Bilingual Education (TBE). This program is required in schools where 20 or more students speak the designated non-English language. The second, Transitional Program of Instruction (TPI), is required when 19 or fewer students speak the designated non-English Language within the school. Only one of the two programs may be offered at a school, dependent upon the demographics within that school specifically.

TBE is a more comprehensive program, which requires that students be instructed both in their home language and in English in all required classes. This program also requires ESL instruction be provided to students. Teachers within this program must be certified ESL teachers or "demonstrate proficiency" in the language they are teaching, if teaching in a bilingual designated class. This is in accordance with certification requirements seen at the federal level.

TPI also requires that teachers be certified as ESL teachers or demonstrate bilingual proficiency in the designated language in order to teach in these programs. However, a TPI

program does not require that students have access to all classes in their home language. TPI programs instead require that ESL assistance be provided to ELL students within the school. “TPI services may include, but are not limited to, instruction in ESL, language arts in the student’s home language, and history of the student’s native land and the United States” (ISBE).

History and Demographics of U-46

District U-46 is the second largest school district in Illinois, the largest being CPS (Chicago Public Schools). According to the U-46 district website, “School District U-46 serves more than 37,000 children in grades preK-12 in 11 communities, including Bartlett, Elgin, Hanover Park, South Elgin, Streamwood and Wayne and portions of Carol Stream, Hoffman Estates, St. Charles, Schaumburg and West Chicago.” For the purpose of this paper, high schools within the U-46 district will be the primary focus. The U-46 district includes 5 high schools: Bartlett, Central School Programs, DREAM Academy, Elgin, Larkin, South Elgin, and Streamwood. Demographics of the U-46 District have changed dramatically over time, especially in regard to the population of ELL (English Language Learner) students. The table below (taken from the Illinois Report Card website) shows that the ELL population for U-46 is substantially higher than the state average.

Level	2021	2020	2019	2018	2017	2016
School	12.6	11.9	8.7	6	4.5	4.3
District	36.8	35.4	33.5	31.5	28.7	28.4
State	12.9	12.5	12.1	11.7	10.7	10.5

While the “School” highlighted (Bartlett High School), falls closer to the state average, the ELL population has shown rapid growth in comparison to the state trend.

The table below (taken from the U-46 district website) shows the change in home languages based on home language surveys. Spanish is now the most common home language within the district. While not all of these students are considered ELL or LEP (Limited English Proficient) students, students with a non-English home language now account for 64% of students within the district.

Changing Student Home Languages at U-46	2003-2004	2018-2019
English %	56	36
Spanish %	35	52
Philipino (Tagalog) %	2	1
Polish %	1	2
Lao %	1	1
Urdu (Pakistani) %	1	1
Gujarati %	1	2
Others %	4	5

As the U-46 district is now the largest outside of the Chicago Public Schools, not only in the total number of students, but also in the number of ELL students, outside of Chicago, the district has implemented new programs and initiatives to specifically address the needs of their diverse student body. This has included the addition of a Dual Language program, offered from elementary school level through high school level. The state mandated Transitional Bilingual Education (TBE) and Transitional Program of Instruction (TPI) are also available, dependent

upon the school's ELL population and the non-English language the student speaks. According to the U-46 district website, the Dual Language program, which was added in the school year of 2018-2019, appears to be a focal point for the district. This will be further discussed in the next section.

U-46 Programs (TPI, TBE, Dual Language)

As discussed in the previous section, TPI (Transitional Program of Instruction) is utilized when a small number of students speak a non-English language (19 or fewer per school). According to the U-46 district website "The ten language groups most often represented in this program are Polish, Lao, Philippine, Tagalog, Urdu, Italian, Gujarati, Korean, German, and Vietnamese." This aligns with the statistics represented in the home language data table. The focus of the TPI program is to aid in academic success and to foster development of fluency in English. Unlike the TBE and Dual Language programs, biliteracy is not a primary focus within this program. ESL classes are offered and count towards graduation credit for these students. Classes are described as "self-contained", with a focus on developing English language skills through "meaningful experiences". There is no elaboration on what constitutes "meaningful experiences". At the high school level, this program is available in Bartlett and South Elgin, where the majority of TPI eligible students reside.

The TBE (Transitional Bilingual Education) program has a greater focus on bilingual education, while maintaining the goal of students being able transition into English only classes in all academic areas. As stated on the U-46 district website "The instructional goal of the program is to meet academic achievement standards for grade promotion and to become proficient in English." While students are developing language skills, required classes are available in Spanish, English as a Second Language, and English, dependent upon the student's

level and needs. At this time, TBE appears to only be offered in Spanish. All other students whose non-English language is not Spanish would only qualify for the TPI program. Despite education being available in Spanish for students within the TBE program, English fluency is the goal, not development of Spanish language skills.

The Dual Language program is relatively new to the U-46 district, specifically at the high school level, where it was introduced in the 2018-2019 school year. This is the first program within the district to specifically aim for biliteracy for students within the program. The promotional and informational materials available through U-46 highlight the possibility of earning the Illinois State Seal of Biliteracy as a benefit and desired outcome of this program. This is also the program for which the district provides the most extensive information.

U-46 states: “In our 80:20 Dual Language Program Model design, students learn school subjects through both English and Spanish instruction. Students are able to develop high levels of academic and language proficiency in their first and second languages.” While the program begins as an 80:20 ratio of Spanish to English in pre-K and kindergarten, by 1st grade, the ratio changes to a 70:30 Spanish to English ratio, then 60:40 in 2nd grade, and 50:50 for 3rd-6th. For 7th grade through 12th grade, there are specific designated classes to be provided in English and Spanish. The chart below (available on the U-46 website) shows the breakdown of high school level classes within the dual language program.

Grade Level	Subject Area Taught in Spanish	Subject Areas Taught in English
9th Grade	Honors SLA I Biology DL Math or DL Honors Math	Electives (2) P.E. Freshman ELA/Honors ELA/ESL

Grade Level	Subject Area Taught in Spanish	Subject Areas Taught in English
10th Grade	Honors SLA II DL Math/DL Math Honors Health (Salud) Elective (1) - 1 Semester	Sophomore ELA/Honors ELA/ESL Elective/Trans. Elective (1) - Yearlong Elective/Trans. Elective (1) - Semester P.E. Chemistry/Honors Chemistry/Integrated Physical Science
11th Grade	AP Spanish Language and Culture/ AP Spanish Literature and Culture/ Double Credit 1 Elective (1 or 2) - 3rd Year of Science Highly Recommended US History (Full-time ELs)	English Language Arts/Honors English Language Arts/ESL P.E. Elective/Trans. Elective (1 max.) Math/Honors Math US History
12th Grade	AP Spanish Language and Culture/ AP Spanish Literature and Culture/ Double Credit 1 or 2/ Latino/a/x Studies DL Econ./DL Civics/DL AP Macro./DL AP Gov. and Pol.: US Elective (0, 1, or 2)	English Language Arts/Honors English Language Arts/ESL P.E. Elective/Trans. Elective (3 max.)

The split appears to remain relatively even throughout high school, with a mix of core classes and electives offered both in Spanish and in English over the four-year span.

An additional layer to the Dual Language program is the “Two-Way” option, which becomes available starting at the kindergarten level. This program invites native-English speaking students, whether or not they are from a Spanish speaking background or home environment, to participate in bilingual education. This creates a mixture of native Spanish

speakers, native English speakers, and provides an option for students who naturally grew up with both English and Spanish as primary languages, acquired at the same time. Students who qualify for language services and their families may choose between the “One-Way” (Spanish speaking background students only) and “Two-Way” (Spanish speaking and English dominant students) programs. The goal of promoting biliteracy has drawn in many students with no Spanish speaking background and provides an opportunity to learn, share, and grow for students from a diverse array of cultures and backgrounds. According to the U-46 website the program is a winner of the "Promoting Bilingualism Award District of Distinction" from Two-Way CABE.

The Dual Language Programs fall under the TBE designation and are intended to replace the TBE program in the future. There are no plans to change the TPI program for students who speak non-English languages other than Spanish at the present.

Identifying and Monitoring ELL Students

The most recent information on ELL testing was available within an “ELL Program Parent Handout” from June 2019 (U-46.org). This would be shortly after the implementation of the Dual Language program. It states the following:

“School District U-46 uses the Illinois State Board of Education prescribed screener instruments Pre-IPT Oral®, WIDA-MODEL™, WIDA Screener™ as well as ACCESS scores as its basis for determining students’ ELL eligibility. WIDA MODEL™, WIDA Screener™, and ACCESS are scored on a range from 1.0 to 6.0.”

No additional information is provided on testing data from ELLs within the district at any level.

Availability of Programs within U-46 (Grades 9-12)

As discussed in previous sections, 3 programs are available at the high school level: TPI, TBE, and Dual Language (One-Way and Two-Way). Within the district of U-46 there are 5 high schools, each providing different programs, dependent upon the demographics of the school specifically. The table below (created using data from the U-46 district website) shows the availability of the programs within the district.

High School	TPI	TBE	Dual Language
Bartlett High School	Available	Available	Available
Elgin High School	Not Available	Available	Available
Larkin High School	Not Available	Available	Available
Streamwood High School	Not Available	Available	Available
South Elgin High School	Available	Available	Available

According to U-46, the TPI program is only used at schools with the highest need for it, currently only Bartlett and South Elgin.

Bartlett High School

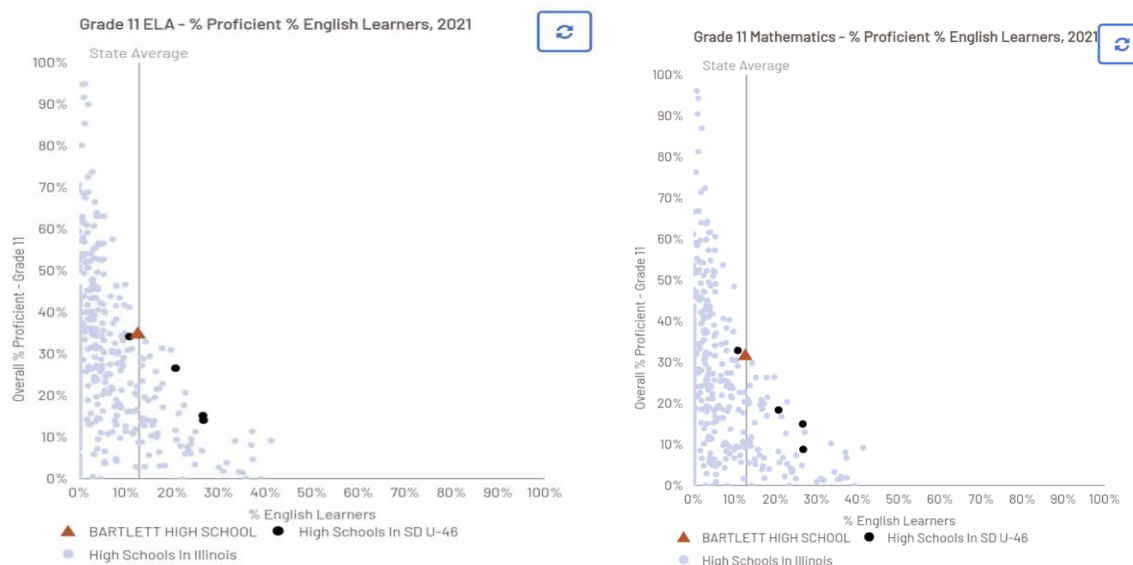
Bartlett High School is one of the five high schools within the U-46 district. It is located in Bartlett, IL and has a student population of 2,377 with 13% identified as ELL students (Illinois Report Card). Bartlett High School is one of two schools within the district that offers all 3 programs of ELL instruction to students, the second being South Elgin. Unfortunately, no public testing data is available beyond what is shown on the Illinois Report Card website.

This message displays when attempting to find testing data for U-46 within the district website:

“There is no right to access U-46 students, staff, or data for research purposes. Access may be granted when determined to be in the best interest of the District. If access is granted, the researcher may only access schools, students, staff, and data relevant to the research as approved in the Research and Data Use Application.”

Additionally, one of the stipulations for accessing data for purposes of research is “research must directly provide educational value to the U-46 Public Schools or the Board of Education” and the purpose for research must address “an identified research priority of the district and does not duplicate research already occurring in the district”.

The only testing information available on Illinois Report Card for ELL students is in the form of scatterplots, comparing proficiency percentage in ELA and Math for 11th grade ELL students at Bartlett High School to the state average as well as other unnamed schools throughout Illinois. The charts below are directly taken from the Illinois Report Card website.



This data shows that 35% of ELL students at Bartlett High School were considered proficient in 11th grade ELA and 32% are considered proficient in 11th grade math. These scatterplots also show the tendency of proficiency to decrease in schools as the population of ELLs increases. This, however, is inconclusive as it does not take into account how many new ELL students have entered a school, how recently students entered the school, and what their proficiency levels were before entering. There is no state average provided for proficiency, but Bartlett High School appears to fall somewhere in the middle, both in regard to proficiency and population.

In regard to budget, Illinois Report Card provides the following chart, which breaks down per student spending both for Bartlett High School and the average spending per student within the U-46 district.

	Bartlett High School			SD U-46		
	FY 2019	FY 2020	FY 2021	FY 2019	FY 2020	FY 2021
Spending Per Student	\$11,686	\$12,552	\$12,881	\$12,351	\$13,042	\$13,767
<i>CHANGE FROM PREVIOUS YEAR</i>	-	+7.40%	+2.62%	-	+5.59%	+5.55%
Enrollment	2,391.75	2,379.83	2,351.32	37,579.13	37,146.14	35,832.48
<i>CHANGE FROM PREVIOUS YEAR</i>	-	-0.50%	-1.20%	-	-1.15%	-3.54%
Low Income Students	38.40%	39.30%	36.00%	60.60%	61.00%	56.90%
<i>CHANGE FROM PREVIOUS YEAR</i>	-2.08%	+2.34%	-8.40%	-2.48%	+0.66%	-6.72%
English Learners	8.70%	11.90%	12.60%	33.50%	35.40%	36.80%
<i>CHANGE FROM PREVIOUS YEAR</i>	-31.03%	+36.78%	+5.88%	-5.97%	+5.67%	+3.95%
Students with IEPs	8.80%	8.40%	8.40%	13.90%	14.50%	14.30%
<i>CHANGE FROM PREVIOUS YEAR</i>	-11.36%	-4.55%	+0.00%	-9.74%	-5.84%	-1.38%
Summative Designation	Commendable	Commendable	Not Calculated	-	-	-

The “Summative Designation” was deemed “Commendable” for both 2019 and 2020 but was “Not Calculated” for 2021. Please note that ELL, IEP, and Low-Income students are represented in regard to enrollment percentage. However, a budget specifically for the ELL programs was not available.

Assessment and Recommendations for U-46

As detailed data was not available for ELL students within the programs, it is difficult to assess the effectiveness of these programs. Based upon the recognition and awards U-46 has received, one would assume that the students within the district’s ELL programs are finding success with the programs available. When contacted, faculty involved with the ELL programs were out of office and unavailable for comment. Unfortunately, this leaves only a broad examination of the programs based on district provided information and educational theories within the realm of ELL education.

An area for concern appears to be the TPI (Transitional Program of Instruction) sector of ELL education within U-46. While logistically it may be impractical to provide bilingual educational opportunities when a very small segment of the student population speaks a designated non-English language, it is still a glaring inequity for the students who are served only by this program. Based on information from the district website, which is minimal at best, the goal of this program is ESL education and full assimilation to English classes as soon as possible. No data was available to confirm the success rates within this program. Bilingual education does not seem to be a main component of this program. In fact, there may not be teachers who speak the home language of the students within the program at all within a school, as this does not appear to be a requirement for this program of instruction.

“The highest-quality programs help students become fully bilingual and biliterate in English and their home language” (Wright, 2019, p.314). This component is absent from the TPI sector of education in the U-46 district. While it is essential that students become fluent in English to find success academically and, later, in their careers, there is a risk of loss (or underdevelopment) of home language skills in a program such as this. Wright (2019) goes on to say: “Effective programs engage in culturally sustaining pedagogies that develop and sustain ELLs’ biculturalism so they can function well in their home and community environments, as well as in the wider U. S. society” (p. 315). Without speaking to faculty and students participating in the TPI program, it is difficult to ascertain whether nurturing students home culture is integral to the program. If not, the recommendation would be to put a stronger emphasis on this aspect of education within the program.

While logistically it becomes more difficult to provide bilingual education for less common languages, such as Urdu, Lao, Polish, Tagalog, and other languages, schools have found ways to successfully include these in their instructional plans. Wright (2019) discusses the creation of bilingual programs in Cambodian, Hmong, and Arabic within school districts (p. 122). This involved recruiting, hiring, and providing paths to certification for members of the community interested in assisting within these districts. Oftentimes this included work after school hours and during the summer months to create materials in these languages and providing translations of English texts within the curriculum. In some cases, translations of the text were cut and pasted directly into the English textbooks. There is also the possibility of contracting translators, who are skilled in many languages, to provide text and curricular materials in the students’ home languages, if hiring and/or providing a path to certification for bilingual teachers in these languages is not a feasible option. Another option could include hiring bilingual

teachers at lower grade levels to create a “Two-Way Dual Language Program” for other languages, as this incorporates both interested native English speakers as well as non-English speakers. If interest level is high enough within these communities, it could create a large enough base of students to justify the costs of the program, thus providing enrichment to English dominant speakers and non-English speakers alike.

As discussed in previous sections, the traditional TBE program is being phased out within the U-46 district and replaced with dual language programs. This is in accordance with best practices within ELL educational theories. “Effective programs also recognize that students do not speak their two languages as isolated, separate entities; rather, they value the ability of bilingual students to draw on their multiple linguistic resources as they translanguage for effective communication and learning purposes” (Wright, 2019, p. 314). The dual language program is the only option within the district’s offerings that allows for this to happen. This program offers dual language classes and allows students to transition freely between Spanish and English as necessary, as discussed in previous sections.

The recommendation in this regard would be to continue building and expanding this program, ensuring that it is offered to all who qualify for or are interested in participating. English speakers are invited to join the two-way version of the program, but must enroll while in elementary school, to ensure that Spanish language skills are strong enough to perform well in the higher-level classes offered at the high school level (U-46). This would include providing adequate information about the program as well as informing parents of the benefits of such a program, even for students whose home language is not Spanish.

Overall, the U-46 district appears to have positive momentum in the field of ELL education and is certainly providing more ELL education than many schools and districts within

Illinois. The recommended adjustments would allow for further inclusion and growth within the already established programs within the district.

Works Cited

Illinois Report Card. (n.d.). SD-U46. Illinois Report Card. Retrieved June 19, 2022, from <https://www.illinoisreportcard.com/District.aspx?districtId=31045046022>

ISBE. (n.d.). Illinois State Board of Education. Illinois State Board of Education; ISBE. Retrieved June 19, 2022, from <http://isbe.net>

U-46. (n.d.). ELL Programs. School District U-46. Retrieved June 19, 2022, from <https://www.u-46.org/Page/7943>

U.S. Department of Education. (n.d.). The Office of English Language Acquisition, Language Enhancement, and Academic Achievement for Limited English Proficient Students (OELA). Home | U.S. Department of Education. Retrieved June 19, 2022, from <https://www2.ed.gov/about/offices/list/oela/index.html>

Wright, W. E. (2019). Foundations for Teaching English Language Learners (Third Edition). Caslon Incorporated.