



Oyster River Cooperative School District

Compliance Guide (LAU Plan) for ESOL Students

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Program Policy and Rationale

The New Hampshire State Department of Education standards call for equal education opportunity and absence of discrimination on the basis of sex, creed, color, marital status, or national origin. Design and implementation of educational services for linguistic minorities are addressed in various federal laws, decisions of the U.S. Supreme Court, and memoranda from the U.S. Department of Education and Office of Civil Rights. According to the Equal Education Act of 1974, U.S.C. 1703, the failure of an educational agency to rectify appropriately a limited English proficient student's English competencies is a denial of equal educational opportunity and access. Discrimination against national origin minorities on the basis of limited English skills is prohibited by case law connected with the Civil Rights Act of 1964, Title VI.

The acquisition of communicative competencies for social purposes and the development of language and learning skills for academic success is a long and complex process. Numerous cultural, linguistic, learning, socio-economic, and motivational factors play an important part in the speed, quality and quantity of English language acquisition.

Such a complex and long-range process requires a well-organized and effective instructional program. A supportive environment, which fosters cultural awareness among all students and faculty and policies, which encourage social integration in and out of the classroom, is also needed for the success of the program.

Program Goals and Objectives

A. Program Goals

The ORCSD is committed to providing appropriate services for ESOL students. The instructional program for English Language Learners enrolled three basic goals:

1. To provide curriculum objectives and an Education Plan for ESOL students. The aim of the curriculum objectives and Education Plans is to develop the English language competencies of ESOL students so that they can compete socially and academically with their same age peers in all-English language classrooms, and to provide access to the general education curriculum the same as their peers.
2. To provide instructional and integrative activities this will expose the ESOL student to American cultural attitudes and behaviors. The intent of the ESOL program is to enhance the understanding of such attitudes and behaviors to build the cultural competencies for interactions with English speakers in the United States.
3. To provide curriculum objectives and learning experiences which will lead to a command of the learning strategies and skills necessary for the ESOL student to compete with his or her English language peers in the classroom and meet his or her learning potential.

B. Program Objectives

To reach the goals, the following program objectives will be implemented:

1. ESOL students will develop proficiency in the English language so that they will understand and be understood in a variety of social and educational situations, relative to the student's age.

2. ESOL students will develop the cognitive-academic skills necessary for learning content in the English language.
3. The ESOL students will require the following services:
 - a. Assessment, development, and monitoring of the ESOL student's English proficiency in speaking, listening, reading, and writing.
 - b. Support in content area domains.
 - c. Pullout services or in-class support as required by the ESOL plan developed by ESOL staff member.
 - d. Regular consultation between ESOL staff member, classroom teacher, and others as needed.
 - e. Monitored status students will be evaluated at least 3x per year according to the school calendar.
4. Students will exit ESOL services when they have met the predetermined criteria (achieving a score of 4.5 or better on the ACCESS test).

Referral and Screening

The ESOL staff member will be notified by the school administrative assistant or school counseling staff member when an ESOL student registers at his or her school.

Using the HLS (Home Language Survey) completed by the parent/guardian during student registration, the ESOL staff member will identify potential students who may be in need of ESOL services. The HLS can be found here

<https://www.education.nh.gov/who-we-are/division-of-learner-support/bureau-of-instructional-support/esol-k-12-english-for-speakers-of-other-languages>.

A certified ESOL staff member will administer an ELP (English Language Proficiency) Screener using the MODEL for kindergarten age students or WIDA Screener paper/online for all other grades 1-12 as mandated by the NH Department of Education to determine the student's proficiency level.

Based on the results of the MODEL or WIDA Screener, the ESOL staff member will determine the eligibility for services. The District ESOL Coordinator will receive a copy of all results. The parental notification letter for Title III compliance along with a parental permission form detailing student's assessment results will be sent home to parents or guardians. Students will be enrolled in the ESOL program after receiving signed permission from the parent and/or guardian. The ESOL staff member will then develop an educational plan for each student and review it with the classroom teachers.

The ESOL Coordinator will roster new students in the State ESOL database found in "myNHDOE".

Placement

Once information from the HLS and ELP Screener has been collected, the ESOL educator will use this information with other information including but not limited to background information, data from previous school settings, etc. to make a holistic determination regarding whether or not the student is fully English proficient. Students determined not to be fully English proficient are classified as ESOL and eligible for ESOL programming and support.

Districts have 30 days from the start of the school year to notify parents of ESOL status for those students enrolled prior to or at the beginning of the school year. If a student enrolls after the first 30 days of school, parent notification must be completed within two weeks.

Program Approach

An appropriate instructional program for English language students is designed to develop the English communicative competencies necessary to communicate effectively in social settings both in and out of school, to achieve academically in all content areas to compete academically with native-English speaking peers, and to use English in socially and culturally appropriate ways. These three broad goals have been established at the national level by TESOL (Teaching English to Speakers of Other Languages) and have corresponding national standards to measure student progress.

Program Design

A staff member who is certified to teach ESOL will coordinate the student's ESOL services and determine the content knowledge needs of non-English language background learners. The district primarily uses the following two program models:

- 1) **ESL or ELD:** Program of techniques, methodology, and special curriculum designed to teach ELs explicitly about the English language, including the academic vocabulary needed to access content instruction, and to develop their English language proficiency in all four language domains (i.e., speaking, listening, reading, and writing)
- 2) **Content Classes with integrated ESL support:** Instruction simultaneously introduces both language and content, using specialized techniques to accommodate ELs' linguistic needs. Instruction focuses on the teaching of academic content rather than the English language itself, although English development may be one of the instructional goals

These models provide formal ESOL instruction using the pullout or in-class support model individualized for each student. These models are recommended for school districts with "low incidence" populations of ESOL students.

During formal ESOL instruction, the student receives support in the following areas:

1. Instruction in English language development (i.e., listening, speaking, reading, writing) preferably based upon themes and content of the subject areas which the student's English language peers are studying in the standard curriculum. If the student lacks the background knowledge to comprehend content in the subject areas, the background information for the subject areas can become the "content" of the ESOL lessons.
2. The student will continue to receive ESOL support services as necessary in order to succeed in the content area classrooms. The New Hampshire guidelines state:
 - a. Entering-knows and uses minimal social and minimal academic language with visual and graphic support.
 - b. Beginning-knows and uses some social English and general academic language with visual and graphic support.
 - c. Developing-knows and uses social English and some specific academic language with visual and graphic support.
 - d. Expanding-knows and uses social English and some technical academic language.
 - e. Bridging-knows and uses social and academic language working with grade level material.
 - f. Reaching-knows and uses social and academic language at the highest level measured by the ACCESS Test.

Instruction

Instruction will be administered by a certified ESOL Teacher or a qualified staff member who is appropriately supervised by the certified ESOL Teacher. Most effective programs for ESOL students include multiple criteria for appropriate ESOL instructional

placement and for placement in content area instruction or in an appropriate elementary classroom. The ESOL student should be placed in ESOL and English language support services as well as any all-English instruction based on the recommendation of the ESOL staff member.

Progress Reporting and Grading of Students Enrolled in ESOL Classrooms

At the elementary school level, progress will be reported 3 times per year: October, January, June. At the middle and high school levels progress is reported four times a year: November, January, April, June.

Exit Criteria for ESOL Students

The WIDA ACCESS for ELLs test score determines exit status for a student (achieve a 4.5 or higher). The student will perform at the Expanding Plus or above and will have attainment of state academic content standards.

- 1) A review of student performance will be done by the ESOL staff member. The student's grades in content or coursework will be reviewed.
- 2) Parent or guardian notification. If a student is exited, a record of this notification will be maintained by the ESOL staff member in ESOL student's cumulative folder. Relevant instructional personnel will also receive a report of the student's reclassification, and any pertinent language or learning strategies diagnosed by the exit activity.

Monitoring ESOL Students

Students transition to monitored status for four years upon attainment of proficiency in English as measured by the WIDA ACCESS for ELLs test. Students must achieve at least a 4.5 composite score to be exited.

1. Student's progress should be checked in concert with school progress reporting requirements as discussed above. If the student does not receive passing grades or does not do well on classroom/district assessment(s) and the issue is related to second language acquisition, he/she may be re-entered in the ESOL program with parental permission.
2. Monitored status should be documented in the cumulative folder, as well as in the ESOL file. This may also be documented in the student information system.
3. After successfully completing the four-year monitor period, the student officially exits from the ESOL program. Full exit documentation should be noted in the cumulative folder as well as in the ESOL files.

Grading and Promotion Guidelines

The following flexible policies on promotion may assist the decision-making process:

1. Elementary Level: The ESOL student is usually promoted to the next grade level with his or her English language peers.
2. Middle/Secondary Level: According to Title VI of the Civil Rights Act of 1964, students cannot be penalized for their limited English. Their Evaluation must be based on the amount of content that they have assimilated during the course, not their English proficiency. The student will receive full credit for

content area courses and ESOL course work. ESOL course work may fulfill the English requirements for graduation.

3. **Retention:** An ESOL student will only be considered for retention in his or her present grade if it is age, developmentally or academically appropriate based on School Board Policy IKE- Promotion and Retention of Students.
4. **Graduation:** According to Title VI, graduation cannot be delayed because of a student's limited English. Required credit in English for ESOL language classes, rather than elective credit, will be given so ESOL students will have sufficient English credits to graduate. ESOL students may remain in High School until age 21 in order to receive adequate and appropriate instruction and to accumulate sufficient credits to graduate. Any situation that automatically prevents a student from graduating on time is discriminatory and a violation of Civil Rights Law.

Responsibilities of the ESOL Staff Member

1. **Caseload:** a list of all students being presently serviced and monitored will be kept. This list will be available to the administrators in each building. Alerts are added in the student information system to identify ESOL students and ESOL monitored students for classroom teachers and service providers working with eligible students.
2. **Teaching:** Develop Education Plans for all ESOL students. Provide direct, intensive English instruction to ESOL students. Provide content area support for students in general education classes. Select and develop materials to be used in ESOL and/or general education classes. Materials are individualized for the student.

3. **Assessment:** Assess incoming students and reassess current ESOL students annually.
4. **Record Keeping:** Establish a folder within the cumulative folder containing assessment results, instructional placement, and samples of student progress, reclassification procedures and follow-up monitoring. The cumulative folder will be passed to the next building as the student progresses. Upon enrollment in a new school, cumulative files are sent by the school district to the new school.
5. **Staff Development:** Develop and implement support services and training activities for standard curriculum teachers or specialists who have ESOL students in their classroom. Provide development opportunities for all staff in the areas of second language acquisition, modification of instruction, cultural awareness, and other facets of multi-cultural education. Encourage and assist teachers to provide quality multicultural activities in their classrooms.
6. **Monitoring/Exiting:** Keep track of progress of ESOL students. Inform Review Team of any needs for additional support. Refer to exiting pages of this compliance guide for criteria.
7. **Reporting:** Report progress to parents, in coordination with general education teachers.
8. **Coordination:** Coordinate all services and decisions for ESOL students:
Serve as a liaison between school and families. Regularly contact classroom teachers.
9. **Budgeting:** Develop a financial budget for each school for the purchase of materials and supplies for ESOL instruction and multicultural education.

The ESOL Review Team

The ESOL Review Team will be formed in each building containing ESOL students. A group of educators will meet to make suggestions and decisions on the ESOL students in the school. The review team may consist of the building ESOL staff member, a district ESOL staff member, the principal or designee, the student's classroom teacher, and the parent and/or guardian and the student when appropriate. The following staff members may be consulted as needed: a school counselor, the district ESOL coordinator, and/or an instructional specialist. The review team may consult during established grade level meetings times or during the MTSS Leadership meeting time.

Responsibilities of the ESOL Review Team:

1. Provide support to the ESOL staff member with issues regarding identification, placement, assessment, monitoring, and exiting of all ESOL students.
2. Adhere to the procedures set forth in this compliance guide.

Yearly Evaluation

A yearly evaluation of the ESOL program will be conducted by the ESOL review team. The team will evaluate changes in the program created by enrollment and personnel changes. In addition to the guiding questions below the district uses The Tools and Resources for Evaluating the Effectiveness of a District's EL Program from the National Toolkit found here <https://www2.ed.gov/about/offices/list/oela/english-learner-toolkit/chap9.pdf> and the NHDOE Program Self-Assessment.

The following questions will guide the discussion:

1. Are staff members aware of who is responsible for ESOL students in the building?
2. How are students being identified?
3. Are Home Language Surveys being completed and the results reported to the ESOL teacher?
4. Are certified ESOL teachers trained to screen and assess students who may be eligible for ESOL services?
5. Are classroom teachers receiving support from the ESOL teacher?
6. Are materials that are needed being purchased?
7. Are exited and service refusal students being monitored for four years?
8. Is the budget appropriate to meet the needs of the ESOL population?
9. Are student needs being surveyed?

Procedures for Referral and Evaluation of Exceptionality in ESOL Students

Consider the follow when determining a referral to special education:

1. Ensure that a child is placed in an appropriate ESOL program and content area classes prior to referral to the Special Education Team.
2. Allow an ESOL student to adapt and transition to the school environment.
3. Review intervention plan for the student as part of the school's MTSS (Multi-Tiered Systems of Support) Model.

The **Special Education Team** shall consider the following as part of the referral to special education which may result in an evaluation:

1. Refer student for language dominance testing if appropriate.

2. If appropriate, arrange that the evaluation be performed in the child's dominant language by a bilingual professional.
3. Look carefully at the student's performance on verbal and non-verbal portions of the test. Where you suspect difficulty in the language of the test and the student's performance supports your suspicion (e.g., the student performs better in non-verbal sections than verbal), make a note in the student's file that the scores may not be reliable due to limited language ability. The team may also consider the area of suspected disability as a reason, such as a communication disorder in their dominant (primary) language.
4. The team will determine if a student is eligible for special education and requires specialized instruction due to a disability according to the Standards for the Education of Students with Disabilities.
5. Develop an individualized educational program (IEP) if the child is identified as eligible for special education. As part of the IEP, the ESOL program will be designed by the ESOL instructor, in cooperation with the Review Team, to meet the needs of individual students.
6. If the student is not eligible for special education services, the team will develop/update/review the intervention plan through the MTSS Model. The team may also consider a referral for a Section 504 plan. Consider the needs identified in the evaluation, which should be served in conjunction with ESOL or content area class placement if a student is not targeted for special education services.

Appendix A

ESOL Resources

Title III Director, ESOL Program-Department of Education, Concord: 603-271-3196 (Technical Assistance; free NH ESL Publications; Information about Legal Compliance, Assessment, Educational Materials, Translators and Interpreters, ESL Teachers' Network, etc.)

UNH-Manchester for information on ESOL collection of books, videos, life skills picture cards, etc. Available through loan at NH ESOL teachers with a special library card.

Parent ESOL classes: NH Dept of Education, 271-6701 and International Institute, Manchester, 647-1500

Free posting of "electronic want ads" for ESOL teaching positions via the NH ESL Teachers' List serve (sponsored by the LAB at Brown University): (603) 744-8371, FAX (603) 744-7961

Office of Civil Rights (OCR), Boston, (617) 289-0020 (Legal information about federal laws and court cases)

Office for English Language Acquisition (OELA), Washington, D.C.

Contact NH Department of Education, Title III Program at 603-271-3196 for appropriate telephone number and contact people.

Directory of Translators/Interpreters: <https://www.education.nh.gov/who-we-are/division-of-learner-support/bureau-of-instructional-support/directory-translators-interpreters>

ORCSD Compliance Plan (LAU Plan): Superintendent's Office or SAU Office has a compliance plan on file for K-12. ORCSD Plan is found here: https://orcscd.org/student_services/e_s_o_l

USDOE English Learner Toolkit found here: <https://www2.ed.gov/about/offices/list/oela/english-learner-toolkit/index.html>.

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Appendix B

Accommodations/Modifications for ESOL students

The ESOL teacher will assess each student's needs and will devise an educational plan to meet their needs which may include accommodations and/or modifications.

Classwork/Instruction

- **Homework:** Homework is often difficult to complete independently. Students may need more time to complete their homework. Doubling the time or halving the homework is often helpful.
- **Giving Directions:** After giving directions the teacher should have the student retell the directions to you. Asking the student if they understand is ineffective because in many cultures it is impolite to ask for a second set of directions if they did not understand the first time. Students may also be able to show you they understand so a check in may be more than a retell. If the student still does not understand, the teacher should try to reword or remodel the directions. If the student still does not comprehend, have an English-speaking student try to explain the directions to the ESOL student (or model). Sometimes children are better at explaining to other children than are adults.
- **Responses:** The teacher should ask questions requiring multiple-word responses, and for which there is not necessarily a single correct answer. The child may be quite good at reproducing one-word, right or wrong answers that will be acceptable without understanding what was said.

Evaluation

By law, these students cannot be penalized for their limited English. Their evaluation must be based on the amount of course content that they have assimilated.

This evaluation should include both what is done in the classroom and with the ESOL teacher.

Written tests are often more difficult for ESOL students. The following modifications can provide for more accurate assessment:

- Administer a test with one-on-one assistance so that the teacher can be certain that the ESOL student understands the questions as well as the English speakers do. (This assistance can be provided by the ESOL teacher.)
- Allow alternate means of communicating, such as gesture, performance, practical demonstration, or any other means to show proficiency.
- Focus on the parts of the test which the student can answer. Base the exam grade on the portions that can be completed. Ignore the remainder of the test. When written responses are required, allow up to several hours for the student to respond.
- Allow for use of Bilingual Dictionary (1:1).
- Consider extra time and setting for evaluations.
- Waive the test entirely and find some other means of evaluating the student that does not depend on proficiency in English.

Appendix C

Home Language Survey

<https://www.education.nh.gov/who-we-are/division-of-learner-support/bureau-of-instructional-support/esol-k-12-english-for-speakers-of-other-languages>

Appendix D

Glossary of Terms

Non-English Proficient (NEP): This student will exhibit little or no comprehension when spoken to and has little or no language product to evaluate. This lack of English communicative competency will become apparent during the initial registration interview or during the administration of the English proficiency test. The student would be placed in the entering/beginning proficiency level of ESOL instruction.

Limited English Proficient (LEP): This student may have studied the English language in his/her native country or been enrolled in ESOL classes previous to enrollment. The student's language proficiency level will be determined based on the English language proficiency test. The student will be in an ESOL instructional level of either developing/expanding.

Transitional English Proficient (TEP): This student has received appropriate ESOL support services and has developed sufficient sociolinguistic competencies to communicate in most social and schooling situations. However, the student may not have developed the language skills necessary for independent learning of content in the standard curriculum classroom. The student's language proficiency level will be determined based on the English language proficiency test. The student will be in an ESOL instructional level of bridging.

LIEP: Language Instruction Educational Program

ELL or EL: English Language Learner or English Learner

ESOL: English for Speakers of Other Languages

WIDA: Education consortium of states

ACCESS: Accessing Comprehension and Communication in English from State to State. This is the name of the WIDA test that is used during the mandated testing time.

APPENDIX E

Sample Permission and Waiver Sample for Parent Refusal for ESOL Services

The English for Speakers of Other Languages (ESOL) staff of the Oyster River Cooperative School District have recommended to me that my child, _____ should enter/continue in the ESOL Program. I understand that my child has the right under State and Federal laws, as well as District policy, to attend this program.

Date: _____ Parent: _____

Date: _____ ESOL Teacher: _____

The English for Speakers of Other Languages (ESOL) Program has been fully explained to me by _____. I understand the program and the services being offered. However, I do not want my child to attend this program and waive any rights or claims that my child or I may have to this entitlement.

Date: _____ Parent: _____

Date: _____ ESOL Teacher: _____

Appendix F

Appropriate and Sufficient Services

Districts must provide direct service, which is “sufficient” and “appropriate”.

Appropriate:

- based on English proficiency needs
- based on current program and instructional practices
- “effective” services which lead to “comparable performance” (district can prove this)
- includes multiple criteria for placement, promotion, exit, etc.
- teaches English and learning-with-English skills
- provides equal access to equal opportunity
- does not segregate students
- documents services

Sufficient Service

The district provides direct English language development and content area instruction (or prior knowledge for content success) until the ESOL student can perform equal to his/her language peers in general education.

ESOL students stay in direct service is reasonable and exit from service is based on specific, multiple criteria, which include proof of sustained performance in English.

Appendix G

WORKING WITH ESOL STUDENTS IN THE REGULAR CLASSROOM

Teacher Behavior

- Establish a language-rich learning environment
- Speak slowly and clearly in a normal tone of voice
- Repeat key phrases to ensure student learning
- Activate prior knowledge
- Draw connections between course content and real life
- Provide hands-on activities
- Break information into manageable chunks
- Limit new vocabulary per lesson or unit
- Provide alternative texts and adapted materials as resources
- Allow extra wait time for language processing as needed
- Ask factual questions first, then proceed to those requiring higher order thinking skills
- Affirm the native language and personal experiences of students

Teaching Strategies

- Use cooperative learning, providing instruction and reinforcement in working collaboratively
- Use peer tutoring
- Use graphic organizers
- Use visuals: photos, illustrations, maps, charts and realia.
- Demonstrate, dramatize and use body language
- Record materials on tape
- Use multimedia to provide a visual dimension to enhance learning

Assessment/Evaluation

- Provide review sheets
- Teach test taking terms and strategies
- Practice test taking ahead of time
- Have a class brainstorm test questions
- Make directions clear
- Allow extra time or provide alternative assessment

General Strategies

- Coordinate with the ESOL staff
- Encourage use of bilingual dictionaries and other resources
- Build cultural awareness and understanding within the classroom
- Use culturally appropriate and relevant materials. Consider materials and their impact that may be culturally insensitive to specific students.
- Use students as a resource if student is comfortable
- Invite school/community resource persons into the classroom

Appendix H

FEDERAL LAWS AND COURT CASES MANDATING EQUAL EDUCATIONAL ACCESS FOR NATIONAL ORIGIN STUDENTS

1964 Civil Rights Act, Title VI

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Office of Civil Rights, October 1970 Memo (requirements based on the 1964 Act)

“Where the inability to speak and understand the English language excludes national origin-minority group children from effective participation in the educational program offered by a school district, the district must take affirmative steps to rectify the language deficiency in order to open its instructional program to these students.”

Equal Educational Opportunities Act, 1974

“No state shall deny equal educational opportunity to an individual on account of his or her race, color, sex, or national origin, by ...(f) the failure by an educational agency to overcome language barriers that impede equal participation by its students in its instructional programs.”

Lau v. Nichols 1974 (US Supreme Court)

“...there is no equality of treatment merely by providing students with the same facilities, textbooks, teachers, and curriculum; for students who do not understand English are effectively foreclosed from any meaningful education.”

Rios v. Read 1977 (US District Court of New York)

“It is not enough simply to provide a program for language disadvantaged children or even to staff the program with bilingual teachers; rather, the critical question is whether the program is designed to assure as much as is reasonably possible the language deficient child’s growth in the English language. An inadequate program is as harmful to a child who does not speak English as no program at all.”

Citron v. Brentwood 1977, 1978 (US District Court, Eastern District of New York)

“The goal instruction by competent bilingual teachers in the subject matter of the curriculum while at the same time teaching non-English speaking children the English language.”

Castaneda v Pickard 1981 (5th Circuit Court)

The court’s decision states that the burden of proof is upon the district that the instructional program designed for a LEP student has clearly developed English language skills of comprehension, speaking, reading, and writing necessary for learning and achieving in English -only instruction at a level substantially equivalent to pupils whose primary language is English.

ESSA

<https://www2.ed.gov/policy/elsec/leg/essa/essatitleiiienglishlearners92016.pdf>

<https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-legislation-table-contents/title-iii-part-a/>

<https://www.tesol.org/advance-the-field/advocacy-resources/essa-resources>

Appendix I

OTHER DOCUMENTS

New Hampshire English Language Learner Identification and Placement Guidance Document
<https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/2020/nh-ell-id-placementguidance.pdf>

NH Identification and Placement Guidance
<https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/guidance-identification-placement-els.pdf>

NHDOE Exit Criteria and Reclassification of ELLs
<https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/el-exit-criteria-reclass-120920.pdf>

NHDOE Reclassification of English Language Learners
<https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/request-reclassification-el-student.pdf>

NHDOE Program Self-Assessment Tool

Appendix J

**PROFESSIONAL DEVELOPMENT
(SEE ATTACHED FOR UPDATED INFO)**