District improvement planning under Title III

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ABSTRACT

Both Title I and Title III (the section of No Child Left Behind; NCLB) are dedicated to improving academic achievement of English Language Learners; ELL) require improvement plans for schools and/or districts that are persistently underperforming. Identification of schools through the AYP requirements of Title I has received a great deal of attention, while identification of districts under AMAO requirements of Title III has received little attention; and the effect of AMAO district improvement plans has received no attention at all. Since the primary manner in which NCLB strives to improve student achievement in both Title I and Title III is through school or district improvement planning, research studies identifying the effectiveness of improvement planning are critically needed. This study examines the effectiveness of AMAO district improvement plans in improving academic achievement in reading of ELL through an examination of (1) district plans, (2) interviews with district personnel, and (3) achievement results in reading in the identified districts. The discussion here is relevant for districts writing improvement plans for ELL programming, state departments of education creating technical assistance processes to support districts, and policy makers at the federal level considering future reauthorizations of Title III.

BACKGROUND

As is generally known by both educators and parents, Title I of NCLB requires that states assign an annual status to each public school. The school is deemed, through a combination of
assessments and other factors, to either be making or not making adequate yearly progress (AYP). Schools that are deemed underperforming for two consecutive years face sanctions, including the requirement to write an improvement plan.

Similar requirements are found in Title III of NCLB. On the basis of ELL language proficiency scores, the state assigns districts a status of either making or not making annual measurable achievement objectives (AMAO). Though a requirement under NCLB since 2003-2004 (Margarita Pinkos, personal communication), at least one state had not assigned AMAO status to any district as late as April 2007 (Sparks, 2007). However, states which did begin district AMAO identification in 2003-2004 have now identified district AMAO status for four years. Identification is well underway, but evidence that the resulting consequences matter is lagging far behind. As outgoing federal Title I director Jackie Jackson put it: “We’ve got state standards, we’ve got assessment systems…. Now, what are we going to do about it?” (Sweeney, 2007, p. 2).

Research regarding ELL participation in NCLB accountability measures under Title III is urgently needed in at least three areas. First, we should be monitoring if the assessments used in the AMAO calculation are appropriate for ELL. Second, we should be independently verifying that districts identified as underperforming by the AMAO calculation are indeed the districts in greatest need of support. And third, we should be asking if writing an improvement plan has a positive impact on the district in terms of ELL programming and, ultimately, ELL academic achievement.

Ideally, these concerns should be addressed in the order presented above. The rollout of education policy, however, is not necessarily ideal. As Wright (2006) notes “NCLB requires something that we don’t yet know how to do” (p. 22). As far as we can tell, the match between
which districts are identified by the AMAO calculation and which districts most need help has not been addressed at all, even though some claim that AMAO “was kind of slapped together” (Gonzalez, in Sparks, 2007b) during the original authorization of NCLB. But given the advanced state of the AMAO consequences, we designed this study to begin to address the third concern: whether or not writing an improvement plan is an effective intervention for a district identified by the Title III AMAO calculation, justly or not, as underperforming.

To begin our investigation of the effectiveness of Title III district improvement planning, we contacted state Title III Directors via an email list serve maintained by the Department of Education. The list serve is used by individuals in charge of Title III in their state to ask questions of each other, to share resources, and to further their understanding of federal policy. In April 2007 we asked: “Do any of you know of any research that has been done or is in the works regarding Title III Improvement Plans required of districts that missed AMAO targets two years in a row?” No state director reported knowledge of a research study that considered whether or not the plans actually improved ELL achievement scores. This relatively small group of professionals is likely to know of any research completed on the program they administer, making it reasonable to conclude that, to date, it is likely that no study has been completed on the effectiveness of Title III district improvement planning.

Documents from the Office of English Language Acquisition (OELA), the arm of the Department of Education that administers Title III, also reveal no research into the effectiveness of district level improvement planning, nor any requirement of NCLB to do so. Guidance published by the US Department of Education makes the state role clear:

“If a State determines that [a district] has failed to make progress toward meeting the annual measurable achievement objectives for two consecutive years, the SEA
must require the [district] to develop an improvement plan. The improvement plan shall specifically address the factors that prevented the [district] from meeting its objectives (3122)(b)(2). The State must also provide technical assistance during the development and throughout the implementation of this improvement plan.” (Part II: Final Non-Regulatory Guidance, 2003, p. 15).

The identification is intended to improve programming for ELL by determining which programs are effective and which programs should be continued or discontinued (Part II: Final Non-Regulatory Guidance, 2003, p. 16).

Guidance does not make clear, however, that the US Department of Education will assist in determining whether or not the identification of districts and subsequent improvement planning results in increased ELL academic achievement. Neither the biennial report (last required for submittal on December 31, 2006) nor the monitoring instrument¹ used by OELA staff during state monitoring visits requires states to report any information regarding the effectiveness of program improvement initiatives of identified districts. There were no sessions listed in the program for the sixth annual OELA summit for Title III implementation that addressed whether or not improvement planning was making a difference (see e.g. Program, 2007).

The international advocacy organization for ELL teaching and learning, Teachers of English to Speakers of Other Languages (TESOL), does not mention AMAO at all in its position statement on NCLB’s accountability measures. In fact, Title III is only mentioned once, in reference to professional development, with a recommendation to “increase federal investment in Title III” (Statement of Principles, 2006). References to Title III are completely absent from the latest position statement by the National

¹ See http://www.n cela.gwu.edu/oela/OELAprograms/MonitoringReports/Monitoring_Instrument.pdf.
Association of Bilingual Education (NABE; NABE’s Principles on the Reauthorization of NCLB, 2007).

Pundits have noted from time to time the irony in NCLB’s directive to use only programming supported by scientifically based research while setting in motion reform policy that has little support in the research (e.g. Rose, 2003). Brennan (2004, p. 9) writes:

“A particularly blatant contradiction, in my opinion, involves the role of research in the Act. The reauthorization of ESEA makes repeated reference to the need to make educational decisions based on ‘scientifically-based’ research, which I would argue is a laudable goal. However, there is no provision in NCLB for a scientifically-based evaluation of NCLB!”

In short, there appears at this time to be no studies on the effectiveness of ELL district reform through the writing of an improvement plan as required by Title III.

METHOD

Participants

We report here on the improvement planning and implementation in the 23 Minnesota districts that were identified after the 2004-2005 school year as not meeting state AMAO targets. These 23 districts are significant because they were the first districts in Minnesota that missed AMAO targets for two consecutive years, triggering the requirement that they submit an improvement plan to the state educational agency. Improvement planning and implementation is required by NCLB as a means to increase ELL academic achievement.

The Minnesota assessments that cover English language proficiency are (1) the Test of Emerging Academic English (TEAE) in reading and in writing, both of which were developed in Minnesota prior to NCLB, and (2) the Minnesota Student Oral Language Observation Matrix
(MNSOLOM), a modified version of a rubric in the public domain that records teacher judgment of ELL speaking and listening skills. The Minnesota assessments that cover the content areas of reading and math are the Minnesota Comprehensive Assessments (MCA) in reading and mathematics.

Title III is fairly specific about the calculation of AMAO, requiring that assessments of reading, writing, speaking and listening all be used to measure (1) the progress of ELL, (2) the percent of ELL becoming proficient during the school year, and (3) whether or not ELL meet state reading and math content area goals. Title III also requires that the measures of progress and proficiency be measured in at least two cohorts.

Minnesota’s calculation of AMAO for progress considers individually the three English proficiency tests (TEAE-Reading, TEAE-Writing and MNSOLOM speaking/listening) for each ELL, thus including three data points for each student. (In practice, since some students are either not assessed or an assessment is lost or inappropriately coded, there are actually one to three data points for each student). For each of these data points, the calculation for progress determines whether an individual ELL’s score is higher by any margin than the previous year’s score. The state requires that the aggregate ELL scores on the assessments reach a certain percentage of scores that exceed the previous year’s scores. Districts are required to meet the percent of ELL making progress in each of three categories: those students who have been in Minnesota schools 0-3 years, 3-6 years, and more than 6 years. Scores from the assessments generated by students who were not tested in the same district the previous year are excluded from the calculation to counter the affects of mobility.

Minnesota’s calculation of AMAO for proficiency considers the three English proficiency tests (reading, writing, speaking/listening) collectively for each ELL, which results in
one data point for each student. That data point reflects whether or not the ELL has reached proficiency. An ELL is determined to have reached proficiency when that student has proficient scores from all three assessments in the same academic year. The State requires that a certain percent of ELL are proficient in each of the same cohorts described above in order for the district to meet State AMAO proficiency goals.

Minnesota’s calculation of AMAO for the content areas of reading and math are the same calculations used in the limited English proficient subgroup of the AYP system. In other words, whatever result the district receives in the AYP subgroup for reading and math, the same result is received in these two AMAO subgroups. As opposed to progress and proficiency measures, there are no individual cohorts.

In all, then, there are eight targets (three for progress, three for proficiency, and one each for reading and math) that compose the AMAO goals for a district. The district cannot be below target in any of these eight categories. Districts do not necessarily have to be above the target in each area, however, since any of the eight areas that has fewer than twenty ELL is not counted in the calculation.

The 23 districts identified by this process in fall 2005 and therefore contained in our sample include six suburban districts, six rural districts in cities with a population greater than 10,000, six rural districts with a population less than 10,000, four charter schools (charter schools are treated as districts in Minnesota for Title III accountability), and one rural consortium of districts. Not including the rural consortium, which has a very low ELL-incidence rate spread across multiple districts, the remaining 22 districts have an overall student enrollment which ranged from 246 students (in a charter school) to 27,856 students, averaging 4,483. ELL enrollment in the districts ranged from 4.1 percent (in the rural consortium) to 78 percent (in a
charter school), averaging 8.9%. 25.6% of the students were eligible for subsidized lunch (range = 12.1 to 93.1 percent) and 12.5% were special education (range = 4.4 to 17.8). Table 1 shows the language groups represented in the sample (consortium included).

**TABLE 1**: Top four languages in the 23 AMAO districts (districts, charters, consortium)

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of Speakers</th>
<th>Percent of All</th>
<th>Percent of Languages other than English</th>
</tr>
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<tr>
<td>All languages</td>
<td>106,993</td>
<td>100%</td>
<td>--</td>
</tr>
<tr>
<td>Non-English</td>
<td>14,303</td>
<td>13.4%</td>
<td>--</td>
</tr>
<tr>
<td><strong>English</strong></td>
<td><strong>92,690</strong></td>
<td><strong>86.6%</strong></td>
<td>--</td>
</tr>
<tr>
<td><strong>Spanish</strong></td>
<td><strong>7,050</strong></td>
<td><strong>6.6%</strong></td>
<td><strong>49.3%</strong></td>
</tr>
<tr>
<td><strong>Hmong</strong></td>
<td><strong>1,352</strong></td>
<td><strong>1.3%</strong></td>
<td><strong>9.5%</strong></td>
</tr>
<tr>
<td><strong>Somali</strong></td>
<td><strong>1,234</strong></td>
<td><strong>1.2%</strong></td>
<td><strong>8.6%</strong></td>
</tr>
</tbody>
</table>

MDE web Oct 1, 2005 count.

Research Questions:

1. To what extent do activities in AMAO improvement plans focus on reading? Is the focus on curriculum, instruction, assessment, or other?

2. To what extent are plan activities implemented?

3. To what extent do district personnel believe the plan has influenced reading curriculum, instruction, and assessment? If not the plan, to what do district personnel attribute changes?

4. To what extent do reading scores differ between districts that were required and not required to write a plan?

We approached the research questions in three distinct steps: Question 1 with a document review (Step 1), Questions 2 and 3 with telephone interviews following a predetermined script (Step 2) and Question 4 with a quantitative look at publicly reported district assessment scores (Step 3).

**Step 1 – Document Review**
Minnesota districts required to write an ELL improvement plan follow a template developed by the Minnesota Department of Education (see Appendix A). The template asks districts to list, under each improvement goal the district sets, specific activities. We numbered the activities in each plan to create a common set of activities to code. We then normed ourselves on three plans chosen at random, each of us coding one plan independently, then debriefing our coding together before coding the second plan, debriefing, and finishing with the third plan and its debriefing. From these discussions we developed a simple coding system (see Appendix A) to categorize the activities as reading-focused or not-reading-focused. Under these two categories, we coded each activity as primarily curriculum, instruction, assessment, or other. Interrater agreement of the dichotomous choice between reading-focused and not-reading-focused activities was r=.76 (p<.01).

Step 2 – Interviews with District Personnel

After completing the categorization of the plans, we conducted 30 to 60 minute interviews with district personnel familiar with the plan. In most cases, the district representative or representatives had been directly involved with the creation of the plan, and when applicable, the plan’s implementation. We conducted a total of 23 interviews (representing 100 percent of our sample) with either a single district representative (n=17) or two district representatives (n=6). Twelve participants were district level program directors (e.g. federal programs, assessment, C&I), eight were ESL directors or coordinators, seven were ELL teachers, and four were principals, assistant superintendents, or charter school directors. We documented interview responses in real time in a Word document and, after completing the interview, immediately sent participants a copy of our notes via email. All 23 individual or paired participants subsequently approved the notes or provided clarifying revisions. Six of the 23 districts sent some level of
additions and/or edits. In all cases, the data analysis was performed using the district-edited versions of the survey, where applicable.

The final question of the interview asked participants to review each plan activity and assign a 1, 2, or 3, where 1 meant the activity had received little or no attention, 2 meant the activity had received some attention, and 3 meant the activity had received a lot of attention. The balance of the questions was geared to determine how the plan was implemented, in what areas (curriculum, instruction, assessment) the plan was implemented, and whether or not district personnel attributed any improvement in ELL academic scores in reading to the creation and implementation of the plan.

ELL reading proficiency scores

All Minnesota districts are required annually to administer the Minnesota Test of Emerging Academic English (TEAE). We analyzed four years of reading scores (two years leading up to identification and two years following initial identification) to determine whether there was a difference between districts required and districts not required to write a plan in fall 2005. All Minnesota districts are also required to annually administer the MCA in reading, though for the school year 2005-2006 districts were allowed to administer the TEAE-Reading in place of the MCA reading. We therefore analyzed the change in MCA reading scores for ELL from 2003-2004 (the first year of identification by the AMAO measures) to 2006-2007 (the most recent year for which we have data), comparing the results of the 23 districts that were required to write a plan with the rest of the districts in the state.

RESULTS

Analysis of the 23 improvement plans revealed an interesting trend in the focus the school district personnel chose to pursue and the wide variety of approaches to improvement.
Most strikingly, only 10% (33/329)\(^2\) of the activities in the improvement plans focused on reading and only five of 23 districts focused at least 40 percent of their activities on reading. Examples of activities coded as primarily reading-focused include analyzing reading test data to align the reading curriculum to standards and assessments and professional development for teachers in best practices for ELL literacy development. Examples of non-reading-focused activities include unspecified staff development for ELL, developing district guidelines for the proper identification and program placement of ELL, and expanding involvement in equity/diversity training. Some of the non-reading-focused activities were math-focused, since math progress on the state math test (not an English language proficiency test by design) can contribute to a district’s failure to meet the AMAO requirements.

Of the activities that focused on reading, 55% (18/33) focused on curriculum. Items we coded as primarily curricular in nature included, for example, the development of a high school ELL program, expansion of a newcomer summer academy, coordination with after-school programming, facilitating tutoring programs, collecting reading materials, and establishing curriculum committees. Twenty-one percent of reading activities (7/33) focused on instruction. District plans included mostly mention of professional development in general or for a specific program like Sheltered Instruction Observation Protocol. Fifteen percent (5/33) focused on assessment. Of the activities not focused on reading, 43 percent (197/296) were not focused on curriculum, instruction, or assessment, targeting instead areas which more indirectly support teaching and learning, such as parent involvement and administrative tasks.

\(^2\) 33 is the average of 30 items classified as primarily reading focused by one of us, 36 items classified as primarily reading focused by the other. We did not attempt to reach consensus.
Beside the common tendency to address areas other than reading, the plans are best characterized by how different they are from each other. In particular, the plans differed in their authorship, emphasis, and scope and specificity.

*Authorship.* The template from MDE does not list who should be involved, nor does Title III of NCLB require specific participants (in contrast to specific NCLB directives for AYP improvement plans under Title I). In Minnesota in fall 2005, four participants we interviewed reported that they wrote the plan more or less alone, though three of the four participants consulted ELL staff to some extent. Of the remaining 19 districts, the number of persons involved in writing the plan ranged from two to 14 or more. Districts that combined the plan with other improvement planning (AYP or curricular review) were more likely to include parents, community members, and school board members in the plan’s development. According to study participants, 20 of 23 districts included an administrator in plan creation, between 12 to 16 of 23 districts included ELL teachers, and three to six districts included mainstream classroom teachers. According to records at the state educational agency, 14 of 23 districts hired an outside consultant. Our interviews suggest that at least two of those 14 districts gave authorship of the plan almost entirely to the outside consultant.

*Emphasis.* Participants, when asked to state the main focus of their plan in their own words, provided twenty-nine total main focuses (some districts didn’t limit themselves to just one main focus). Their replies evidence a rather long list of focuses, none of which were repeated across all districts more than three times. Mentioned two or three times each, in no particular order, were:

- Analyzing data;
- Assessment;
• Curriculum alignment;
• Identification and placement procedures;
• Nonspecific staff development;
• Reading;
• Sheltered Instruction Observation Protocol implementation; and
• Standardization across the district/charter.

Scope and specificity. The number of activities listed in each plan varied tremendously. One plan consisted of a single district-wide activity, while other plans listed multiple activities, sometimes broken down by each school building (n=23, range=1-49 activities, mean=14.3, s.d.=12.3). The number of activities is generally reflected in the size of the document. Some plans were composed of a few pages and one was sent to the state educational agency as a set of three 3-ring binders. Excluding the plan sent in the 3-ring binder: n=22, range=2-31 pages, mean=11.5, s.d.=7.4.

The degree of specificity of the activities varied as well. Some plans were very general. For example, one district with three total activities lists as one activity: “We will explore different ways to service our ELL students with the staff that we have.” Another district wrote that that they intended to “plan for future staff development.” Other activities were very specific. One of the 18 activities in one district reads: “With the help of an outside expert, discuss the pros and cons of the current ESL program with the entire staff. Brainstorm solutions to issues of appropriate pull-out time, lack of courses ELLs, inappropriate placements, etc.”

Because reform efforts based on improvement planning can be criticized on the basis that the plan is written to comply with state mandates but then left on a shelf instead of used in implementation, two of our interview questions attempted to elicit the degree to which the
improvement plan was actually used to direct district improvement efforts. We asked (see Appendix B):

- How would you say the AMAO Improvement Plan is being used? (Question 5); and
- Which, if any, staff members in your district are using the AMAO Improvement Plan? (Question 6)

Nine of 23 districts (approximately one-third) reported that they used the improvement plan as a guide or checklist to see if they were on track with their reform efforts and to inform discussion topics and reports during staff meetings. Six of 23 districts (approximately one-fourth) answered the question, but in a manner which made it impossible for us to discern exactly how they were using the plan. It is possible that these general and/or oblique answers were indicative of districts which did not use the plan, but that is unclear. Other responses included indications that the activities of the plan had been implemented or accomplished, that the activities received attention following the first year of identification but that the plan was forgotten after a subsequent year of making AMAO, and that the activities of the improvement plan were followed because they were the same activities that were embedded in other activities, including professional development supported by a University grant and district improvement planning required by Title I. Two of 23 districts reported they did not implement the plan at all.

In answer to the question regarding who is using the plan, three districts reported that only ELL staff used the plan, seven of 23 districts (approximately one-third) reported the plan was used only by administrators and ELL staff, eight of 23 districts (again just about one-third) reported that ELL staff and all teachers used the plan, and two districts reported that “everybody” used the plan. To slightly temper what may appear to be fairly widespread use of the plans, often districts responded, as reported in the words of one participant, that the plan itself wasn’t
necessarily “in front of anyone,” but that the initiatives in the plan were currently or had been underway in the past. In other words, the plans are perhaps best described not as a document for teacher use, but rather as a guide for administrators.

A district which found the improvement planning process helpful mentioned that the plan was a great stepping stone that forced the district and school board to understand the need for additional staff to help current ELL staff. In other words, without the external requirement of the plan, perceived needs of a few ELL administrators would have gone unaddressed. In their words, “last year we used it to research a new curriculum and to implement a new curriculum. We used it to research delivery models and to change the way we deliver instruction to our students. We accomplished almost all the goals we set.”

A district for which the plan had smaller but still positive effects mentioned that the plan didn’t make a difference in the curriculum overall, but did matter in the choice of some of the supplemental materials. And while instruction and assessment might not have changed much, the requirement to write a plan provided the ESL coordinator needed leverage. She reported that she used the plan to say “we have to do this because of AMAO” and that the process “causes us to be less complacent. We always have to work a little harder because you don’t want to be on the bad list.”

A district for which the plan seems to have played little or no role responded that “we aren’t using it” even though they felt there were good ideas in the plan. Because the district didn’t help the principals own the plan, and because the district relies on site based management, it had “minimal impact, if any.” Additionally, there weren’t any salaried positions to support the plan, so even though the district personnel involved in the plan creation felt the plan was strong, there was no administrative structure to support its implementation.
Importantly, when asked the extent to which the district improvement plan had positively influenced reading curriculum, instruction, and assessment, nineteen of 23 districts mentioned that the plan complemented some other initiative, notably district level curriculum review (9 districts), district Title I AYP plans (5), visits from the state educational agency’s ELL experts (3) as well as Reading First (2), Title I school-wide programming (1), and a University ELL professional development grant (1). Additionally, districts that met AMAO goals in the year after the initial identification reported that the implementation of the plan suffered. One district reported that

“…it was intense for the first year. But then we came off AMAO the next year, so why do a two-year plan? There was no pressure in the second year. The level of anxiety, the heightened awareness, was gone. So the idea of a two year plan isn’t necessary. Because we were off the list in year two and no one is going to come and check [from the state educational agency].”

The external pressure the AMAO identification brings is real, and in several cases, appears to make a difference in the amount of attention the district shifts to improvement planning for ELL.

We asked each district the following summative question toward the end of the interview:

“How do you believe the AMAO Improvement Plan has affected the reading achievement of ELL in your district” (Question 11)? Of the 21 districts that report some degree of plan implementation, responses show a range in beliefs regarding the impact of the plan on reading achievement. Some districts responded that it is too early to attribute any changes to the plan or that the plan is just one of many initiatives in the districts, making attribution of changes to the plan difficult. Some districts were confident that the plan had no effect on reading achievement.
At least 8 of 21 districts made clear statements that in their opinion the plan contributed to gains they have experienced in district or state assessment scores, the number of students reaching grade level, or a perceived closing of the achievement gap.

We followed up Question 11 by asking districts a question which did not appear on the survey. We asked them, in response to their answer regarding how the plan affected ELL reading achievement: “How do you know that?” We were interested in the type of data districts rely on and how deep their understanding of the accountability system for AMAO is. Approximately half (12) of the districts didn’t give specific examples of data to support their claims that ELL reading achievement was or was not affected. Nearly half of these districts (5 of 12) reported that they didn’t know or didn’t believe it was possible to know yet if the AMAO Improvement Plan had impacted achievement. Approximately one-third (8) mentioned specific tests or program eligibility to back up their claim that the AMAO Improvement. Approximately one-fourth (6) mentioned making AYP (2) or AMAO (4) status as an indication that the AMAO Improvement Plan was working.

As a final measure of the degree to which plans were implemented, we asked each district to consider each of the activities in their plan and designate with a three-point scale whether the plan had (1) received a great deal of attention, (2), some attention, or (3) nearly no attention. For activities we coded as primarily focused on reading, the median score was 2 (n=14; 9 districts had no activities coded as primarily focused on reading) and for activities not primarily focused on reading the median score was 1.5 (n=22; one district had no activities coded as not primarily focused on reading). Non-reading activities were reported as receiving more attention than reading activities, receiving as an aggregate in the middle between lots of attention and some attention.
The ultimate goal of creating an improvement plan is to improve student academic achievement. We used public data available on the state website for both the TEAE-Reading (the English language proficiency assessment in reading) and the MCA (the academic test in reading used to assess all Minnesota students). With both tests, we compared the scale scores of all students who took the assessment, by grade, of the 23 Title III districts that were required to write a plan (plan-writers) with all other districts with ELL that were not required to write a plan (non plan-writers). The consortium is not included due to the small number of ELL in the consortium’s individual member districts, making the maximum number of districts included 22. Because the public data is filtered at n<10, grades in districts with fewer than 10 assessed ELL are not included, resulting in a number of districts assessed per grade of 22 or less.

The changes in scores from 2003-2004 to 2006-2007 show a trend of plan-writing districts lagging behind non plan-writing districts in the first year of identification (2003-2004) to leading plan-writing district across many grade levels two years following plan-writing (2006-2007). Table 2 shows average TEAE-Reading scale scores of the plan-writing districts (before the plan was actually required) compared to non plan-writing districts. Note that, in these four sample grades, the districts identified after year 2003-2004 appear to have improved their TEAE-Reading scores, relative to non-identified districts, during the 2004-2005 school year – before a plan was required but after the first year of identification as underperforming. Despite possible improvement in academic scores (relative to other districts), these 23 districts did not meet AMAO on at least one of the eight possible targets in 2004-2005, leading to the requirement to write a plan in fall 2005. Table 3 shows average TEAE-Reading scores for the same four grades for districts required to write a plan compared to districts not required to write a plan. Relative to non plan-writing districts in fall 2005, the plan-writing districts appear to score, on average,
better, with perhaps a lasting effect during the second year after the plan was required (2006-2007).

**TABLE 2:** Difference in average TEAE-Reading scores (scale scores) between plan-writing and non plan-writing districts (2003-2004 and 2004-2005)

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Difference</td>
<td>Plan n</td>
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<tr>
<td>Grade 3</td>
<td>-4.76</td>
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<tr>
<td>Grade 6</td>
<td>-8.11</td>
</tr>
<tr>
<td>Grade 9</td>
<td>-2.45</td>
</tr>
<tr>
<td>Grade 12</td>
<td>-3.59</td>
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</tbody>
</table>

**TABLE 3:** Difference in average TEAE-Reading scores (scale scores) between plan-writing and non plan-writing districts (2005-2006 and 2006-2007)

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<tr>
<td>Difference</td>
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<tr>
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<td>Grade 9</td>
<td>3.46</td>
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<tr>
<td>Grade 12</td>
<td>8.49</td>
</tr>
</tbody>
</table>

An additional comparison of Fall 2005 plan-writing districts and Fall 2005 non plan-writing districts can be made by comparing all tested grades for the TEAE-Reading. The comparison of TEAE-Reading scores of the 2003-2004 school year (administered in October, 2003; Table 4) and the TEAE-Reading scores of the 2006-2007 school year (administered in May 2007; Table 5) shows that the plan-writing districts trailed non plan-writing districts in 2003-2004 in every grade but one (fifth grade). However, during the 2006-2007 school year, the non plan-writing districts outscored the plan-writing districts in only two of ten grades. While by no means conclusive, the results suggest that the identification as not meeting state AMAO targets (given the rise in scores in 2004-2005 before the plan was required) and/or the plan-writing and implementation (given the continued rise in scores relative to non plan-writing
districts in 2006-2007) have a measurable effect on TEAE-Reading scores, which is to say, on ELL reading achievement as measured by the TEAE.

**TABLE 4:** TEAE 2004 Reading Results – The difference between plan-writing and non plan-writing districts. (A negative difference means plan-writers scored worse than non plan-writers in that grade.)

<table>
<thead>
<tr>
<th>Grade</th>
<th>State Plan-writing Districts</th>
<th>Non Plan-Writing Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Average Score</td>
<td>Average Score</td>
</tr>
<tr>
<td>3</td>
<td>175.51</td>
<td>175.5</td>
</tr>
<tr>
<td>4</td>
<td>195.69</td>
<td>195.6</td>
</tr>
<tr>
<td>5</td>
<td>216.14</td>
<td>216.1</td>
</tr>
<tr>
<td>6</td>
<td>224.02</td>
<td>224.0</td>
</tr>
<tr>
<td>7</td>
<td>216.99</td>
<td>217.0</td>
</tr>
<tr>
<td>8</td>
<td>225.73</td>
<td>225.7</td>
</tr>
<tr>
<td>9</td>
<td>230.67</td>
<td>230.7</td>
</tr>
<tr>
<td>10</td>
<td>229.99</td>
<td>230.0</td>
</tr>
<tr>
<td>11</td>
<td>227.13</td>
<td>227.1</td>
</tr>
<tr>
<td>12</td>
<td>230.99</td>
<td>231.0</td>
</tr>
</tbody>
</table>

**TABLE 5:** TEAE 2007 Reading Results – The difference between plan-writing and non plan-writing districts

<table>
<thead>
<tr>
<th>Grade</th>
<th>State Plan-writing Districts</th>
<th>Non plan-writing Districts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Average Score</td>
<td>Average Score</td>
</tr>
<tr>
<td>3</td>
<td>200.2</td>
<td>199.4</td>
</tr>
<tr>
<td>4</td>
<td>220.9</td>
<td>220.6</td>
</tr>
<tr>
<td>5</td>
<td>225.2</td>
<td>224.3</td>
</tr>
<tr>
<td>6</td>
<td>238.0</td>
<td>235.2</td>
</tr>
<tr>
<td>7</td>
<td>242.3</td>
<td>242.4</td>
</tr>
<tr>
<td>8</td>
<td>253.4</td>
<td>254.4</td>
</tr>
<tr>
<td>9</td>
<td>238.8</td>
<td>244.7</td>
</tr>
<tr>
<td>10</td>
<td>247.0</td>
<td>247.4</td>
</tr>
<tr>
<td>11</td>
<td>250.2</td>
<td>255.3</td>
</tr>
<tr>
<td>12</td>
<td>250.8</td>
<td>262.2</td>
</tr>
</tbody>
</table>
A similar comparison can be made using the ELL scores on the MCA-Reading.

Unfortunately, the scale of the MCA changed between 2004-2005 and 2005-2006, as well as the standards the test was written to assess, making comparison between Table 6 and Table 7 problematic. Additionally, the MCA was not given in grades 4, 6, and 8 until the 2005-2006 school year. About all that can be said is that the plan-writing districts scored lower than non plan-writing districts on the MCA in both 2004 and in 2007.

**TABLE 6: MCA II 2004 – Difference between plan-writing districts and non plan-writing districts – ELL scores**

<table>
<thead>
<tr>
<th>Grade</th>
<th>State Average Score</th>
<th>Plan-writing Districts Average Score</th>
<th>N</th>
<th>SD</th>
<th>Non Plan-Writing Districts Average Score</th>
<th>N</th>
<th>SD</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>1340.8</td>
<td>1304.8</td>
<td>21.0</td>
<td>51.4</td>
<td>1339.5</td>
<td>214.0</td>
<td>70.7</td>
<td>-34.7</td>
</tr>
<tr>
<td>4</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>5</td>
<td>1344.1</td>
<td>1309.0</td>
<td>18.0</td>
<td>60.2</td>
<td>1339.0</td>
<td>188.0</td>
<td>69.1</td>
<td>-30.1</td>
</tr>
<tr>
<td>6</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<td>NA</td>
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<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>7</td>
<td>1353.4</td>
<td>1341.6</td>
<td>18.0</td>
<td>32.4</td>
<td>1352.5</td>
<td>132.0</td>
<td>28.8</td>
<td>-10.9</td>
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<tr>
<td>8</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
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<td>NA</td>
</tr>
<tr>
<td>10</td>
<td>1323.3</td>
<td>1271.7</td>
<td>10.0</td>
<td>46.1</td>
<td>1316.7</td>
<td>97.0</td>
<td>76.3</td>
<td>-45.0</td>
</tr>
</tbody>
</table>

**TABLE 7: MCA II 2007 – Difference between plan-writing districts and non plan-writing districts – ELL scores**

<table>
<thead>
<tr>
<th>Grade</th>
<th>State Average Score</th>
<th>Plan-writing Districts Average Score</th>
<th>N</th>
<th>SD</th>
<th>Non Plan-Writing Districts Average Score</th>
<th>SD</th>
<th>N</th>
<th>Difference</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>346.6</td>
<td>345.3</td>
<td>21.0</td>
<td>5.4</td>
<td>346.7</td>
<td>250.0</td>
<td>7.1</td>
<td>-1.4</td>
</tr>
<tr>
<td>4</td>
<td>441.9</td>
<td>440.6</td>
<td>20.0</td>
<td>4.6</td>
<td>442.0</td>
<td>233.0</td>
<td>5.2</td>
<td>-1.4</td>
</tr>
<tr>
<td>5</td>
<td>543.7</td>
<td>541.2</td>
<td>21.0</td>
<td>5.5</td>
<td>543.8</td>
<td>209.0</td>
<td>5.3</td>
<td>-2.5</td>
</tr>
<tr>
<td>6</td>
<td>641.5</td>
<td>639.2</td>
<td>19.0</td>
<td>5.6</td>
<td>641.3</td>
<td>188.0</td>
<td>5.6</td>
<td>-2.1</td>
</tr>
<tr>
<td>7</td>
<td>737.7</td>
<td>735.6</td>
<td>17.0</td>
<td>5.4</td>
<td>737.0</td>
<td>154.0</td>
<td>5.6</td>
<td>-1.4</td>
</tr>
<tr>
<td>8</td>
<td>840.5</td>
<td>838.8</td>
<td>18.0</td>
<td>4.9</td>
<td>839.2</td>
<td>139.0</td>
<td>5.0</td>
<td>-0.3</td>
</tr>
<tr>
<td>10</td>
<td>1036.8</td>
<td>1035.0</td>
<td>12.0</td>
<td>6.8</td>
<td>1035.4</td>
<td>108.0</td>
<td>6.9</td>
<td>-0.4</td>
</tr>
</tbody>
</table>

Future comparisons, with similar tests based on similar standards in all grades 3-8 and 10, will result in more useful trend data with the MCA-reading assessment.
DISCUSSION

The purpose of NCLB is to eliminate the achievement gap while ensuring that all children are proficient in at least reading and math. Title III of NCLB sets out to accomplish this goal for ELL by identifying districts that do not meet state targets and requiring, after two years of falling short of expectations, improvement planning and implementation. If the improvement planning process proves over the years to be a positive experience for districts, resulting in improved academic achievement of ELL students, we can reasonably conclude that the accountability measures in Title III have at the minimum done no harm, and at best have positively contributed to the education of the ELL population. If the improvement planning process as currently required by Title III results in mere compliance by districts, either as a neutral “this too shall pass” reform or even as a negatively perceived federal and state intrusion into the affairs of districts, we can reasonably conclude that the Title III improvement process needs to be modified or abandoned, since the resources going into its support and implementation are essentially time ill spent – and there is little room for wasting student or educator time.

This study, we believe, is the first to examine Title III AMAO improvement plans and their potential effect on ELL achievement. This study alone, of course, will not be able to determine whether the accountability measures of Title III will prove in the long run to be effective or ineffective. But it does represent a starting point. The data here point to some interesting findings regarding the current state of Title III improvement planning in Minnesota. The data also suggest some interesting lines of inquiry that should be pursued to extend and reinforce what we know of NCLB reform in practice.

The state reading assessment from the comparable assessment (the TEAE) suggest that scores of ELL in the 23 districts originally identified as not meeting state AMAO targets
improved, relative to all other districts, after the first year of identification and before any improvement planning began. If this phenomenon is found with future cohorts of districts after their first year of falling short of state AMAO targets (and with larger number of districts), we may be able to begin asking if identification alone doesn’t set off a chain of events in a district that ultimately improves ELL tests scores. Since the consequences of missing AMAO targets for just one year are limited to notification of parents of ELL, there may be an argument that the public reporting of the district’s status does influence the district in a manner that benefits students, at least in terms of test scores. A logical follow-up question will be whether or not the rise in test scores (a rise that was not statistically significant in this study) is worth the time, effort, and costs associated with the Title III accountability system.

State reading assessment scores (again, on the comparable assessment, the TEAE) appear to have continued climbing, relative to districts that did not have to write a plan, after the second year of missing AMAO targets, which was the first year in which the districts were required to write an improvement plan. At this point, there may be a combined effect of the pressure of public reporting and the additional attention to ELL programming in the creation of the plan and possibly the implementation of the plan. If with future cohorts of districts required to write an AMAO improvement plan scores also trend upwards relative to non plan-writing districts, the more important question will again become whether or not the increase in ELL achievement scores is worth the time, effort and costs. In other words, is the method of arriving at the results commensurate with the level of results?

While assigning credit for the improvement in ELL assessment scores is difficult – and determining whether or not the scores reflect an actual increase in student achievement is more difficult – it is worth noting that the discussion here is about whether or not the scores of the 23
districts identified by AMAO as underperforming in fall 2005 are doing about the same as other districts or better – not if they are doing worse. Districts identified in future years as underperforming will hopefully take heart in these early results that suggest the identification does not harm students (vis-à-vis ELL achievement scores on the state reading tests) and possibly have resulted in improved ELL achievement scores. Policymakers, hopefully with input from educators, will be left to decide if the amount of improvement is worth the expended effort in achieving that improvement, and further research should show the degree to which any upward trend is sustainable.

It is important to note factors which may have made the plans and their implementation less effective than they could have been. In five of 23 districts, ELL staff wrote the plans alone, presumably hampering eventual district-wide implementation. Two of 23 districts reported that the plan was not implemented at all, one due to a lack of staff capacity and one apparently due to turnover in a key ELL leadership position. Furthermore, district personnel familiar with the plans reported that specific reading activities were given, on average, “some attention,” while non-reading activities were given between “a lot of attention” and “some attention.” Had all 23 plans been implemented with interdisciplinary support, results between plan-writing and non plan-writing districts may have been more marked, with plan-writing districts opening the gap in testing results further.

The data suggest several areas in which the plan-writing and implementation process could improve. These areas are in plan-writing, plan content, state educational agency oversight, and federal considerations for reauthorizing NCLB.

*Plan-writing.* Writing and submitting a plan to the state educational agency does not guarantee a quality plan. Even thought the state educational agency has a published rubric for reviewing the
plans, the practical authority of the state education agency is limited and districts can, if they choose, submit plans which are so general and so short that there is little reason to believe the plans would have an effect on the ELL instructional program. The shortest plan submitted by the 23 districts was two pages in length; the plan with the fewest activities listed a sole activity as the focus of the plan. While it’s only speculation, one can reasonably conclude that the authors of Title III, and the legislators who voted in favor of NCLB, probably imagined a somewhat more robust improvement plan as the consequence for falling below state AMAO targets two consecutive years. This is not to say that a short plan with few activities is necessarily of poor quality – merely that, on average, a plan that may have been written by a single administrator in a single afternoon is more likely to have indeed been written to satisfy compliance concerns rather than direct concerted district-wide improvement efforts.

Writing an improvement plan does not guarantee its implementation. While only two of 23 districts self-identified as not implementing the plan at all, districts that were not identified an additional year tended to report that the plan was more or less abandoned in the its second year because it was no longer required. Apparently, absent the external motivation of sanctions or a visit from the state educational agency, the full day to day schedules of administrators and teachers tend to crowd out top-down initiatives like mandated improvement planning.

Requiring a district-wide improvement plan does not guarantee that the plan will be written or implemented district-wide. Because Title III is a program for ELL, many districts place the ELL coordinator, who may be responsible for more than ELL or may be an ELL teacher with added administrative responsibilities, in charge of the plan. Depending on the connections that person has within the district – and probably depending on where that person falls in the district hierarchy – the plan may or may not be written with the influence of parties
outside the ELL department. When the plan is created solely in the ELL department, the plan technically may be said to cross the district, but the plan tends to end where the influence of the ELL department ends, which is most likely short of a true district-wide initiative. Additionally, if the plan is written to satisfy federal and state requirements, without similar federal and state requirements for implementation, the plan may not be implemented at all or will be left to the ELL staff, whose influence likely does not extend beyond the ELL program. To truly support district-wide reform, the state educational agency will need to put in place requirements that encourage all plan-writing districts to include those whose influence is truly district-wide and to support in a meaningful way ongoing implementation.

**Plan content.** It is surprising that only one in 10 activities in the combined plans focused on reading when reading and math are the testing cornerstones of NCLB. Title III requirements themselves contribute to this percentage, since it is required, for example, that improvement plans address parent involvement. While parent involvement may be a key component to student success, its inclusion in the priorities for the AMAO improvement plan may function somewhat as an escape hatch for districts, allowing a plan’s focus to migrate away from academic issues more immediately in a district’s control. We suggest that policymakers consider changes in Title III that focus reform very specifically on academics. In the short term, we suggest to state educational agencies and consultants working with districts to help the district focus by helping the district know when it is focusing on compliance behavior (i.e. keeping the district in good standing so as not to in any way jeopardize federal funds) and when the district is focusing on sound pedagogical practice for ELL. These two foci will at times overlap; they are also at times quite different activities.
Districts are more likely to focus on improvement planning under Title III if the plan creation and implementation complement, as oppose to add to, existing district initiatives. Districts which were required to write a plan but also happened to be in a curriculum review cycle focusing on ELL programming, or districts that also had to create an improvement plan under Title I tended to engage more individuals in the plan creation and to follow through with implementation. There is a very real limit on the amount of work district administrators can take on while keeping the quality of the focus high. To the extent possible, the AMAO improvement planning process developed and supported by the state educational agency should dove tail with existing district efforts. In fact, a good first step in the process, once identified as having to create an improvement plan, would be to identify all other district and site level improvement planning that impacts ELL, tailoring the additional requirement specifically to those existing initiatives.

**State educational agency oversight.** Several districts mentioned that they were far more inclined to implement their plans when they knew that officials from the state educational agency were coming to visit the district. Some district personnel saw the external motivation of both the requirement to write the plan and site visits as useful levers for them to gain the attention of the administration on behalf of the ELL program. While personnel at state educational agencies are generally stretched to the limit, the comparable small amount of time invested in a site visit compared to the relatively large amount of time the personnel at the site may spend focusing on getting ready for the visit and, in this case, working to show that plan implementation is underway, highly recommends site visits to state educational agencies. In so far that the AMAO rules prioritize district need, site visits to identified districts should to the extent possible be annually scheduled.
In the same vein, districts may be far more likely to create a quality plan if the plan is much more public. While no districts recommended this particular step, we believe that publishing improvement plans on the state website would provide some additional extrinsic motivation for districts to create an ELL improvement plan they are willing to endorse in their own communities. Further, districts faced with writing an improvement plan would have models produced by other districts in the state to consult with as they began the improvement planning process.

It is also important for state educational agencies to realize that district personnel have difficulty citing valid data to support their conclusions regarding the effect of the improvement plan in their district. Five districts reported, probably quite accurately, that they didn’t have enough data to know whether or not the improvement plan was effective. Six districts, however, reported that their plans must have been effective because their AYP status (two districts) or AMAO status (four districts) changed from not making state requirements to making state requirements. This is a bit of a red herring, however, as the AYP rules have changed year to year as the federal government has introduced more and more flexibility (and the state has accepted the flexibility when it translated to identifying fewer districts) and the language proficiency tests for AMAO status were moved from the fall of 2004 to the spring of 2006, giving students many additional months to show an increase in test scores over the previous years, which were fall to fall test years. This puts the state educational agency in a rather awkward position, as it has simultaneously defend its method of identifying underperforming districts and caution them about using the results of the same identification system as proof of improvement. While touchy, the problem isn’t insurmountable, and our best advice for the state educational agency is to make the identification process as transparent as possible to avoid creating misconceptions.
Federal considerations for reauthorizing NCLB. At the federal level, it may be wise either to disentangle Title I and Title III accountability completely or to merge the two systems together. Title III accountability at the district level is too easily relegated to second-tier status below the AYP of Title I, which can lead to marginalized Title III planning and implementation, which in turn marginalizes ELL. If Title III’s accountability system stood entirely alone, reading and math scores from the state academic assessments would not figure into district AMAO identification at all, allowing Title III plans to focus squarely on English language proficiency. Alternatively, if the two accountability systems were merged, districts involved in plan-writing and implementation might be far more likely to treat identification for not meeting AMAO targets in a truly district-wide fashion instead of relegating Title III improvement efforts to the ELL program administration, thereby running the risk of assigning much lower significance to the improvement effort, particularly in districts with weak ELL programs or weak ELL program administration – exactly the districts which could presumably benefit the most from solid improvement planning.

Improvement planning and implementation under Title III appears to have both merit and significant room for improvement. Each year NCLB continues its practice of identifying underperforming districts, the necessity of demonstrating the effectiveness of the identification and improvement planning process will rise. For accountability under Title III to last long enough to undergo needed transformation, instead of the easier total repeal or reformulation, it is incumbent on state educational agencies and other organizations to demonstrate the manner in which Title III accountability is helpful and in what ways it in can be improved. The success of many of the ELL currently in our schools depends on it.
REFERENCES


Sparks, S. (September 10, 2007). House draft calls for “full curriculum” for ELLs. Education Daily, 40(163), 5.

Sparks, S. (April 6, 2007). ED takes closer look at Title III requirements. Education Daily, 40(6), 1-2.

Sweeney, J. (July 20, 2007). School improvement should be next focus of NCLB. Education Daily, 40(133), 1-2.

Appendix A

DATA COLLECTION: AMAO improvement plans

District Number _________ District Name ___________________________________

AMAO history _______________ Year of Improvement Plan _________________

Reason for identification for 04-05 status (check here if not identified this year _____)

<table>
<thead>
<tr>
<th>Progress Cohort A</th>
<th>Proficiency Cohort A</th>
<th>Content Language Arts</th>
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<tbody>
<tr>
<td>Progress Cohort B</td>
<td>Proficiency Cohort B</td>
<td>Content Math</td>
</tr>
<tr>
<td>Progress Cohort C</td>
<td>Proficiency Cohort C</td>
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Reason for identification for 05-06 status (check here if not identified this year _____)

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<tbody>
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<td>Proficiency Cohort B</td>
<td>Content Math</td>
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<tr>
<td>Progress Cohort C</td>
<td>Proficiency Cohort C</td>
<td></td>
</tr>
</tbody>
</table>

Reason for identification for 06-07 status (check here if not identified this year _____)

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<tbody>
<tr>
<td>Progress Cohort B</td>
<td>Proficiency Cohort B</td>
<td>Content Math</td>
</tr>
<tr>
<td>Progress Cohort C</td>
<td>Proficiency Cohort C</td>
<td></td>
</tr>
</tbody>
</table>

Performance Targets

Directions for reviewers:

Mark which of these goals the district addresses in its performance goals:

________ Progress    ________ Proficiency    ________ Language Arts    ______ Math

________ Other (describe)                                                                 

__________________________________________________________________________________________
Strategies and activities

Directions for reviewers:

Each plan has a list of a number of “strategies and activities” (as required by the State directions for the creation of the plan). In each plan, the “strategies and activities” have been numbered.

First, each reviewer will determine if the strategy/activity addresses reading achievement.

* [create guidelines – explanation – one before starting and one modified afterwards]. For each plan, the reviewer notes the number of the strategy/activity in the Y (yes) or N (no) column.

Second, for each strategy/activity in the Y (Yes) column, the reviewer will decide if the strategy/activity best belongs in A. Curriculum, B Instruction, C Assessment or D Other. The reviewer writes the number of the strategy/activity in the space provided.

Third, for each strategy/activity in the N (No) column, the reviewer will decide if the strategy/activity best belongs in A. Curriculum, B Instruction, C Assessment or D Other. The reviewer writes the number of the strategy/activity in the space provided.

Fourth, when each reviewer has completed all the first 3 AMAO Improvement plans, the reviewers will confer about their ratings and adjust the guidelines for determining where each strategy/activity is best classified. Then the reviewers will complete the Review for the remaining 22 AMAO improvement plans.

Guidelines for determining whether or not a strategy/activity addresses reading:

A. Reading is considered to be addressed if the strategy/activity:
   1. specifically mentions reading or language arts; or
   2. indirectly acknowledges that student reading will be supported by or is a necessary component of the strategy/activity.

B. When the reviewer truly feels that whether or not reading is addressed is a toss-up, the strategy/activity should be classified as addressing reading.

C. For categorizations in A, B, C or D, the reviewer must choose one category – the one that the reviewer feels is the best fit.
Total number of strategies/activities: ______________

<table>
<thead>
<tr>
<th>Reading is addressed</th>
<th>Y</th>
<th>N</th>
</tr>
</thead>
</table>

For each strategy/activity in the **Y (Yes) column** above, consider whether that strategy/activity falls into A, B, C, or D below.

**A. Curriculum:**
The strategy/activity addresses the implementation of a new or existing program or activity that generally is at the building level.

**C. Assessment:**
The strategy/activity addresses the evaluation of assessment results to inform decisions about curriculum and instruction. If any part of the strategy/activity involves this type of assessment, categorize here (if the assessments are actually used, not just given).

**B. Instruction:**
The strategy/activity addresses teacher activity that is concentrated at the classroom level, but also includes professional development activities at classroom or building level.

**D. Other:**
The strategy/activity does not address A, B, or C above.

For each strategy/activity in the **N (No) column** above, consider whether that strategy/activity falls into A, B, C, or D below.

**A. Curriculum:**
The strategy/activity addresses the implementation of a new or existing program or activity that generally is at the building level.

**C. Assessment:**
The strategy/activity addresses the evaluation of assessment results to inform decisions about curriculum and instruction. If any part of the strategy/activity involves this type of assessment, categorize here (if the assessments are actually used, not just given).

**B. Instruction:**
The strategy/activity addresses teacher activity that is concentrated at the classroom level, but also includes professional development activities at classroom or building level.

**D. Other:**
The strategy/activity does not address A, B, or C above.
Appendix B

TELEPHONE SURVEY
AMAO Improvement Plans and Reading Instruction for ELL

Date of interview ___________________________
Name of interviewee ______________________________________________
Title of interviewee ________________________________________________
School District ___________________________________________________

Note that instructions to interviewer are in italics. Instructions that should be stated to the interviewee are in bold. The interviewee has a copy of this same set of questions EXCEPT for what appears in italics.

Let’s walk through the abbreviations first to make sure we share a common understanding of terms.

Terms and abbreviations:

AMAO – Annual Measurable Achievement Objectives – state targets for school districts to meet for their English language learner population
AMAO Improvement Plan – the plan required by MDE for your district to meet Title III requirements of No Child Left Behind
ELL – English Language Learner (used for all common abbreviations for students learning English as an additional language, including EL, ESL, ESOL, LEP).
MDE – Minnesota Department of Education

The first four questions are background questions.

1. When you were first called regarding your participation in this phone survey, were you aware that your district had filed a district-wide improvement plan with MDE (the AMAO Improvement Plan)?

2. Who (by role, not by name) was involved in writing the AMAO Improvement Plan?
   Were you involved in writing the district ELL improvement plan?

3. Please describe your role as head of the ELL programming in your district.

4. Please describe your ELL population.

Now I’ll ask questions which are more specific to the AMAO Improvement plan.

5. How would you say the AMAO Improvement Plan is being used?
6. Which, if any, staff members in your district are using the AMAO Improvement Plan?

7. What is the main focus of your AMAO Improvement Plan?

The next four questions are all related, asking about the reading curriculum, reading instruction, reading assessment, and student results.

8. How would you say the AMAO Improvement Plan has affected the reading curriculum for ELL in your district?

9. How would you say the AMAO Improvement Plan has affected reading instruction of ELL in your district?

10. How would you say the AMAO Improvement Plan has affected reading assessment of ELL in your district?

11. How do you believe the AMAO Improvement Plan has affected the reading achievement of ELL in your district? (Listen for answer) How do you know that?

We’re almost finished. Just a couple more.

12. Would you like to share anything else about the AMAO Improvement Plan and its effect on ELL in your district in general?

Allow long wait time!

I’d like to ask one more thing of you that’s not on your list of questions.

13. What one additional question could I have asked that would have told me more about how the AMAO Improvement Plan has impacted reading achievement of ELL in your district?

Allow long wait time!

14. Elicit a response to the question the interviewee formulates in question 14.

What would be your answer to the question you formulated?

Thank you very much. If I have questions about part of this conversation as I’m working on this research project, can I call you again for clarification? Record answer.

WALK THROUGH PLAN – 1 HIGH, 3 LOW …

And if you have any questions, please ask them now or contact me anytime. I’m at 612-626-6344 or magn0103@umn.edu. Thanks again
**Title III Annual Measurable Achievement Objectives (AMAO) Improvement Plan for English Language Learners**

**GENERAL INFORMATION AND INSTRUCTIONS:** Districts in need of improvement based on not making Annual Measurable Achievement Objectives (AMAO) must develop or revise an Improvement Plan which specifically addresses the needs of English Language Learners (ELL). NCLB Sec. 3122 (b) (2). (See attachment for specific instructions and guidelines required for submission of your work plan.)

**Mail this form only** (with the required signatures) via U.S. Postal Service to Donna Larkey at the above address. **Do not include a copy of the Improvement Plan.** Postmark must be dated no later than **November 23, 2005.**

Please submit the Improvement Plan as a Word document via e-mail to: donna.larkey@state.mn.us by **November 23, 2005.** Type: AMAO Improvement Plan [Name of your District and District #] in the subject line. **Note:** MDE will accept improvement plans in **electronic format only.**

☐ Plan was e-mailed to the above address on ____________

*(Fill in date of electronic transmittal of Improvement Plan)*

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**District Identification Information**

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**Improvement Plan Information**

Improvement plan addresses the following AMAOs (check all that apply).

☐ Progress Cohort A  ☐ Proficiency Cohort A  ☐ Content Language Arts

☐ Progress Cohort B  ☐ Proficiency Cohort B  ☐ Content Math

☐ Progress Cohort C  ☐ Proficiency Cohort C

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**Assurance**

The District assures that it has notified the parents of all ELL students in the district of the district improvement status based on AMAO.

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**Local Board of Education Action**

The local Board of Education of ______________________ (district name) has authorized ______________________ (person’s name) at a monthly meeting held on ____________ to act as the LEA Representative in filing the District AMAO Improvement Plan as provided under Public Law 107-110 for the school year 2005-2006. The LEA Representative will ensure that the school district maintains compliance with the appropriate Federal statutes, regulations, and state procedures currently in effect and will act as the responsible authority in all matters relating to the administration of this District Improvement Plan. The following person is authorized as contact person:

______________________________
Signature of LEA Representative  Date
DEVELOPING THE AMAO IMPROVEMENT PLAN

GENERAL INFORMATION AND INSTRUCTIONS:

The district must develop or revise an improvement plan which specifically addresses the factors that prevented achievement of the annual measurable achievement objectives. In developing or revising this plan, the district must consult with parents, school staff, and others.

The plan should follow the “Required Components” (listed below) in terms of content but can vary in terms of format to correspond to district processes. The plan should be created as a Word document and submitted as per the instructions on the front page of this form.

- The plan is a two-year plan. Objectives must be specified for each year of the two-year plan.
- The plan must address the fundamental teaching and learning needs of English language learners.
- The plan must incorporate scientifically-based strategies and methodologies to improve instruction provided to English language learners.
- The plan must include professional development strategies and activities that will help the districts to meet objectives.
- The plan must include parental involvement activities tied to the district’s objectives.

REQUIRED COMPONENTS FOR AMAO IMPROVEMENT PLAN

1. Overview
   - Brief narrative description of district ELL profile
   - Statement of ELL program mission

2. Comprehensive Needs Assessment
   - Description of the needs assessment process
   - Summary of data based on current status of educational program

3. Performance Targets
   - Evaluation of past performance
   - Description of meaningful future targets based on data and research

4. Strategies and Activities
   - Description of activities with timelines

Questions regarding program improvement for ELL may be directed to:

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<th>Name</th>
<th>Role</th>
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<tbody>
<tr>
<td>Dieu-Anh Nguyen</td>
<td>ELL Programming &amp; Refugee Issues</td>
<td>651-582-8574</td>
<td><a href="mailto:Dieu-anh.nguyen@state.mn.us">Dieu-anh.nguyen@state.mn.us</a></td>
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<tr>
<td>Bounlieng Phommasouvanh</td>
<td>ELL Programming &amp; Immigrant Issues</td>
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<td><a href="mailto:Bounlieng.phommasouvanh@state.mn.us">Bounlieng.phommasouvanh@state.mn.us</a></td>
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<tr>
<td>Leigh Schleicher</td>
<td>ELL Programming</td>
<td>651-582-8326</td>
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