Internal Audit Report	Division of Curriculum and Instruction, Department of Teaching and Learning, Office of ESOL and World Languages
	ESOL: New Immigrant Enrollment Audit February 2023

ESOL

English for Speakers of Other Languages

BALTIMORE COUNTY PUBLIC SCHOOLS

Empowering multilingual learners and immigrant families by providing linguistically and culturally responsive instruction and support services.

Baltimore County Public Schools
Office of Internal Audit

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Chief Auditor

Report Highlights

ESOL: New Immigrant Enrollment
February 2023

Objective

To determine if the multilingual enrollment process supports the needs of new immigrant students.

Background

The ESOL office assesses and identifies multilingual learners and works collaboratively with schools and community groups to coordinate and deliver services to families of multilingual learners.

Audit Period

July 1, 2022 through November 30, 2022.

Summary of Results

The ESOL office cannot fully accomplish their mission at their current staffing level.
- 10 of the 20 budgeted positions are vacant.

The home language survey data (HLS) is not always documented when students enroll in BCPS via the Parent Portal or when former students re-enroll.
- Automated controls to ensure that HLS data is documented during enrollment can be bypassed in some instances.

There is no data to support that all newly enrolled non-English speaking students were assessed or are receiving ESOL services.
- The ESOL office is not always notified that an assessment or request for scores was needed.

The ESOL Welcome Center student assessment area is not adequate.
- Assessment areas are not free from noise and other distractions.

Audit Rating

Needs Improvement

The ESOL office received a needs improvement audit rating for the enrollment process:
- The design of controls only partially addresses key risks.
- Controls are not operating consistently.
- Some high and medium-rated issues were identified.

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BACKGROUND

Organizational Status & Purpose

BCPS serves students who represent 141 different countries and speak 123 different languages. Over the past 13 years, the number of English Learners (ELs) that need services has increased by 228.8%, from 3,365 in FY2010 to 11,063 in FY2023. The ESOL office[1] provides support and services to these students. Enrollment into BCPS for non-English speaking students, who are new to Maryland (MD) schools[2], begins at the ESOL Welcome Center. The Welcome Center staff meet in-person with families to:

- Interview and test students to determine English proficiency.
- Evaluate foreign transcripts.
- Recommend grade placement.
- Verify residency.
- Assist with completion of forms for registration and other school programs.
- Provide referrals to a health center for immunizations.
- Explain the US school system.

Additionally, the ESOL office has an ESOL mobile unit, however, it has not been placed into service due to lack of resources.

Regulations

The Every Student Succeeds Act (ESSA) of 2015 requires local educational agencies to provide English Learners with English language development programs to attain English proficiency. Additionally, the Code of Maryland Regulations (COMAR) 13A.05.07 provides regulations that pertain to all programs for English Learners.

The recently enacted Blueprint for Maryland's Future established the Workgroup for English learners in Public Schools to make recommendations that will accelerate the academic achievement of ELs. The workgroup's final report was issued in November 2022. Nine recommendations were brought forward in the report that will result in substantial improvements to the programs and services available to multilingual families, including enrollment services. Additionally, changes in the state funding formula are anticipated to provide an additional $8,000 per English learner student, to be phased in over the next 10 years.

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[1] The ESOL office is part of the Office of ESOL and World Languages under the Department of Teaching and Learning, Division of Curriculum and Instruction.

[2] Students previously enrolled in other Maryland school districts do not require an assessment at the Welcome Center. Assessment data is acquired from their previous school.

COMMENDATIONS

Resources   The ESOL office has provided clear and concise enrollment guidance for multilingual families on their website. Additionally, relevant enrollment guidance for school staff is provided on the ESOL website and on the ESOL Wiki group on Schoology. A comprehensive training session for school-based registrar's is also conducted annually by ESOL staff.

Refusal of Services   Parents may opt out of recommended ESOL services for their students. Documentation was available to support parent approval when ESOL services were refused.

RESULTS

The ESOL office cannot fully accomplish their mission at their current staffing level.

Issue Rating	High
Criteria	BCPS is required by state and federal law to establish, implement, and sustain high-quality language instruction programs to assist ELs to develop both English language proficiency and to meet the same challenging academic standards that all children are expected to meet.
Issue	The ESOL Office has 20 central office positions to provide support to schools, multilingual students, and their families. Of the 20 budgeted positions, only 10 (50%) are staffed. When compared to Baltimore City Public Schools, the BCPS ESOL office has four fewer positions to serve 2,100 more EL students. Additionally, staffing needs are anticipated to increase as the EL population in BCPS continues to expand.
Cause	Five of the 10 vacant ESOL positions are frozen due to budget cuts. The other five positions are currently advertised.
Effect	There is a risk that the ESOL office cannot assess students for ESOL services in a timely manner, which could potentially delay students registering to a school. To meet the registration demands, the ESOL office uses contractual staff and reassigns current staff to perform additional functions. Currently, there is only one person for each position type. The risk of loss of institutional knowledge increases when only one staff member is trained for a position and holds specialized information.
Recommendation	The vacancies within the ESOL office must be filled in order for the office to fully provide the required services for English Learners. Additionally, as the ESOL student population grows, staffing levels should be evaluated to determine additional needs.

Management's Corrective Action

The Office of ESOL is working collaboratively with Human Resources to schedule interviews for any positions approved to be filled. As of February 2023, we have hired the two vacant Bilingual Program Assistants at the Welcome Center. We have interviewed for the ESOL Specialist position but were unable to move anyone forward. A second round of interviews is scheduled for February 22, 2023, and there are some strong candidates. The Family School Liaison positions were recently posted after being frozen by the Superintendent, so we are awaiting applicants to schedule interviews. The Office of ESOL works directly with Human Resources to regularly communicate/inquire about viable applicants and schedule screening interviews. At this time, the resource teacher positions are still vacant and on hold and we still have one resource teacher on long term medical leave, but she will return the first week of March. Both the Director of ESOL and World Languages and the Coordinator of ESOL continue

to conduct screening interviews on a regular basis for any viable candidates for vacant instructional positions and have reached out to MSDE to post these positions for considerations in a larger network. We have also inquired with Human Resources about posting ESOL positions for resource teacher and Specialist on a national scale. The Office of ESOL would also propose that opportunities are made available to conduct recruitment for all ESOL positions, including teachers, on a larger scale, such as recruitment at dual immersion or TESOL conferences or at college and university job fairs across the country. We would also like to create a request to the next Superintendent that if any positions are frozen across the system, we would like ESOL employees to be exempt from this process due to the ongoing growth of the office responsibilities as well as the needs incurred because of the ESOL Strategic Plan. The Director of World Languages and ESOL is currently working directly with partners at the Towson University College of Education to mentor and connect with students enrolled in the new Bilingual Education and ESOL minor to help develop a pathway for them to become teachers of ESOL.

In addition to working diligently to fill these positions, the Coordinator of ESOL has written five additional positions into the Title III Immigrant grant and is waiting for approval from the state. These positions will support the Welcome Center and Family Engagement and were identified through collaborative discussions with other offices in BCPS. These positions will be an immediate support to the growing EL population as opposed to positions funded through the operating budget that are based on the October 31 EL count from the prior year.

Responsible Person(s)   Director, ESOL and World Languages
                          Coordinator, ESOL
                          HR Officer, Staffing

Anticipated Completion Date   Ongoing until all positions have been filled.

The home language survey data (HLS) is not always documented when students enroll in BCPS via the Parent Portal or when former students re-enroll.

Issue Rating	Medium[3]
Criteria	The purpose of the HLS is to identify potential ELs who will require assessment of their English language proficiency to determine whether they are eligible for the ESOL program. BCPS includes three questions on the HLS related to the students' native language, primary home language, and the primary language used by the student. According to the Maryland State Department of Education (MSDE), the HLS should be completed for new and returning students. Exceptions would be for students who were ELs when they left BCPS and re-enter as ELs, or for students with an HLS already on file.
Issue	The required HLS data was not entered into Focus[4] for seven newly enrolled students and for 50 former students that were recently re-enrolled[5].
Cause	The system controls developed to ensure that HLS data is captured during enrollment can be bypassed in two ways:

- When students are enrolled by BCPS staff directly in Focus, there is an automated control that requires HLS data to be entered before a student identification (ID) number is assigned. However, this control is not included in the online Parent Portal. If enrollment is initiated through the online Parent Portal, a student ID can be assigned regardless of the completion of HLS data. Once an ID has been assigned, Focus will flag an error for the missing data, but does not stop the enrollment process.
- When a former BCPS student re-enrolls, the student's previous ID number is re-assigned. If the HLS data is not entered, Focus will flag an error for the missing data, but does not stop the enrollment process.

Additionally, for all student enrollments, the school registrar is responsible to ensure that all required fields are complete before enrollment is finalized, however, this is not consistently done.

Effect	There is a risk that students in need of EL services will not be identified, and as a result, their academic success may be negatively affected.

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[3] Issue affects only 1% of enrolled students as of November 30, 2022.
[4] Focus is the current electronic student information system used by BCPS.
[5] The total number of enrollees for the audit period was 9485.

Recommendation   HLS data must be obtained and documented for the students identified during the audit. Additionally, implement controls in Focus and the Parent Portal that cannot be bypassed to ensure that HLS data is entered when all students are enrolled. Also, develop a system-wide Focus report for use by ESOL and school staff to routinely monitor documentation of the required HLS data.

Management's Corrective Action

We will work directly with the Department of Information Technology to make improvements to the FOCUS registration to ensure that enrollment cannot continue without the Home Language Survey questions being completed. Once this corrective action is completed on the technology side, we will include this update in enrollment liaison training.

We will also work with DOIT to develop a system-wide FOCUS report that can be used by ESOL and school staff to routinely monitor documentation of the required Home Language Survey. Once the report is completed, the Office of ESOL will add a routine pull of that report to its standard operating procedures.

The Office of ESOL is currently following up with the 57 identified students who did not complete the HLS upon enrollment or reenrollment and to date have not identified any student who should have been assessed for ESOL services.

Responsible Person(s)   Coordinator, ESOL
                      Specialist, ESOL
                      Director, Technology Solutions Development
                      Executive Director, Department of Information Technology

Anticipated Completion Date   July 1, 2023

There is no data to support that all newly enrolled non-English speaking students were assessed or are receiving ESOL services.

Issue Rating	High
Criteria	Students with a language response other than English for at least two of the HLS questions must be assessed to determine if they qualify for ESOL services. School staff are required to refer these students to the Welcome Center or notify ESOL staff that an assessment is needed. Additionally, for students identified as MD transfer students the school's ESOL teacher must submit an EL Update Form to the ESOL office so that a request for scores can be sent to the student's former school to identify their EL status.
Issue	The responses to the HLS for 182[6] newly enrolled students indicate that they should be assessed to determine eligibility for ESOL services. However, there is no data in Focus to indicate that the students were assessed or are receiving services.
Cause	The notification process for determination of EL status is not automated. Additionally, school staff did not notify the ESOL office that an assessment or request for scores was needed.
Effect	There is a risk that students in need of EL services will not be identified, and as a result, their academic success may be negatively affected.
Recommendation	The EL status must be determined and if applicable, services offered, to all students identified during the audit. Additionally, automate Focus to identify students that need an assessment based on the HLS responses and populate their EL Status field with Status Pending. Also, develop a system-wide Focus report for use by ESOL and school staff to routinely monitor students whose status is pending to ensure that a final EL status is determined.

Management's Corrective Action
We have identified several underlying causes that have contributed to eligible students not being assessed and/or identified in FOCUS as an EL. The most prominent causes include the following student groups:

1. When a student transfers from another Maryland school, the student can register directly at the school site. To identify these students, schools have been asked to complete an EL Update Form with all the required information for the English Learner tab in FOCUS. Out of the 182 students identified in the audit, 110 were transfer students for whom schools failed to complete the EL Update form. Several of these students were already receiving ESOL services in the BCPS school but were not officially identified in FOCUS.

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[6] 110 of these students were identified as MD transfer students.

At this time, we have identified the EL status for 67 of the 110 students. The Welcome Center is continuing to work with schools to find resolutions for the remaining students.

Before receiving the audit findings, The Office of ESOL had identified a new process for the transfer students, which we have been working with DOIT (Division of Information Technology) to complete by July 1, 2023. This process will embed the EL Update form directly in FOCUS so that it is not a separate process, thereby minimizing possibility for identification errors. In addition to the technological change, we will ensure that Enrollment Liaisons are trained on the new process once it is in place. We plan to complete this professional development for Enrollment Liaisons by July 1, 2023. In addition, we will utilize the HLS report developed in FOCUS to identify students who may require ESOL services. It is important to note that we cannot rely solely on that report for transfer students because there are times when the responses to the HLS have changed but the student should still be an identified English learner. The Coordinator of ESOL has also been working with ESOL Coordinators across the state to advocate for the purchase of Ellevation so that Maryland transfers can be seamlessly, electronically transferred. Two districts, Baltimore City and Anne Arundel, are planning to purchase for next year.

2. Students in Kindergarten are another student group who do not enroll through the Welcome Center. This year, we implemented a K EL Update Form inside of FOCUS. The use of the form was phenomenally successful because it streamlined the work of the office and allowed us to get over 1,000 Kindergarten students identified much more quickly. However, there were 17 incidences when the student form was rejected based on incorrect information and the teacher failed to resubmit. Our office plans to address this in our training at the beginning of the school year. In addition, through Ellevation, we are able to identify the K students as potential ELs based on their responses to the Home Language Survey. Beginning next year, the ESOL Welcome Center will regularly check the list of potential ELs in Kindergarten and send reminders to ESOL teachers to complete testing and the K EL update form.

3. The final group of students were coded as internal BCPS transfers but there is no previous record to support that code, so it is an error by the school. Since they were not identified as new to the system, the Welcome Center enrollment processes would not have been initiated. We will share these student records with the Office of Student Support Services, so they can work with their team to identify the breakdown.

Responsible Person(s)   Coordinator, ESOL
                        Specialist, ESOL
                        Director, Technology Solutions Development

Anticipated Completion Date   July 1, 2023

The ESOL Welcome Center student assessment area is not adequate.

Issue Rating	Low
Criteria	Best practices for assessments should be followed to accurately assess students. The Maryland Comprehensive Assessment Program testing manual indicates that "Every assessment setting should have good lighting and ventilation, a comfortable room temperature, and should be as free as possible from noise and other interruptions."
Issue	The ESOL Welcome Center is housed in the BCPS Catonsville Administration Building, a former elementary school building. The space allocated to the Welcome Center is primarily one large space divided into smaller spaces by approximately 5-foot-tall partitions. Only three small cubicles are available for assessing EL students. If more than three students need to be assessed, the students are seated at desks near a stage area where there is no privacy or protection from noise and visual distractions. Another small area provides limited seating for family members to use while students are assessed. Staff desks, offices, and storage areas encompass the rest of the space. On the day of Internal Audit's observation visit, conversations between staff and family members could be heard throughout the entire center, including the assessment areas. The tall ceilings and short partitions allow sounds to easily carry throughout the space. See **Appendix A** for photos of the Welcome Center.
Cause	The amount of space allotted to the ESOL Welcome Center is not sufficient. During our observation visit, Internal Audit staff noted that some of the space allocated to other departments housed inside of the BCPS Catonsville Administration Building were vacant of staff. Additionally, the partitions in some of these areas were very tall and offered better protection from noise and distractions.
Effect	Students who are distracted by excess noise in the Center may not be assessed correctly for ESOL services. Additionally, family members may have to stand, sit on the floor, or wait in their vehicles if there isn't adequate seating for them.
Recommendation	Work with the supervisor of the Catonsville Administration Building to determine if additional, or different, areas of the building can be used by the Welcome Center to better accommodate testing for EL students and their families. Additionally, implement the ESOL Mobile Unit to assess students for ESOL services to reduce the number of students serviced at the Welcome Center.

Management's Corrective Action

The Office of ESOL is in the process of redesigning the Welcome Center to include additional partitions to support the multiple uses of the current facility including space for assessment, parents, and resource materials. In addition to our improvements at the Welcome Center in Catonsville, we will also be launching our Mobile Welcome Center this spring. The Mobile Welcome Center will allow us to bring services directly to families in communities which are located further away from Catonsville or who have poor public transportation options to get to Catonsville.

Further, staff from the Office of ESOL and the leadership from the Division of Curriculum and Instruction will continue to partner with the Department of Facilities to analyze space needs for the Welcome Center and collaborate to identify facility needs and appropriate specifications for the critical need to support our multilingual learners and their families.

Responsible Person(s)   Director, ESOL
                         Executive Director, Academics
                         Staff from the Department of Facilities

Anticipated Completion Date   Ongoing

Space updates to the current large ESOL space to begin with American Design in Spring, 2023, to be completed by August, 2023. Once the request is made for underutilized space, we will report back to the audit team the next steps in process to covert the space to use by the Office of ESOL. Our additional, much-needed mobile Welcome Center bus we hope to have completed and out for community events no later than June of 2023.
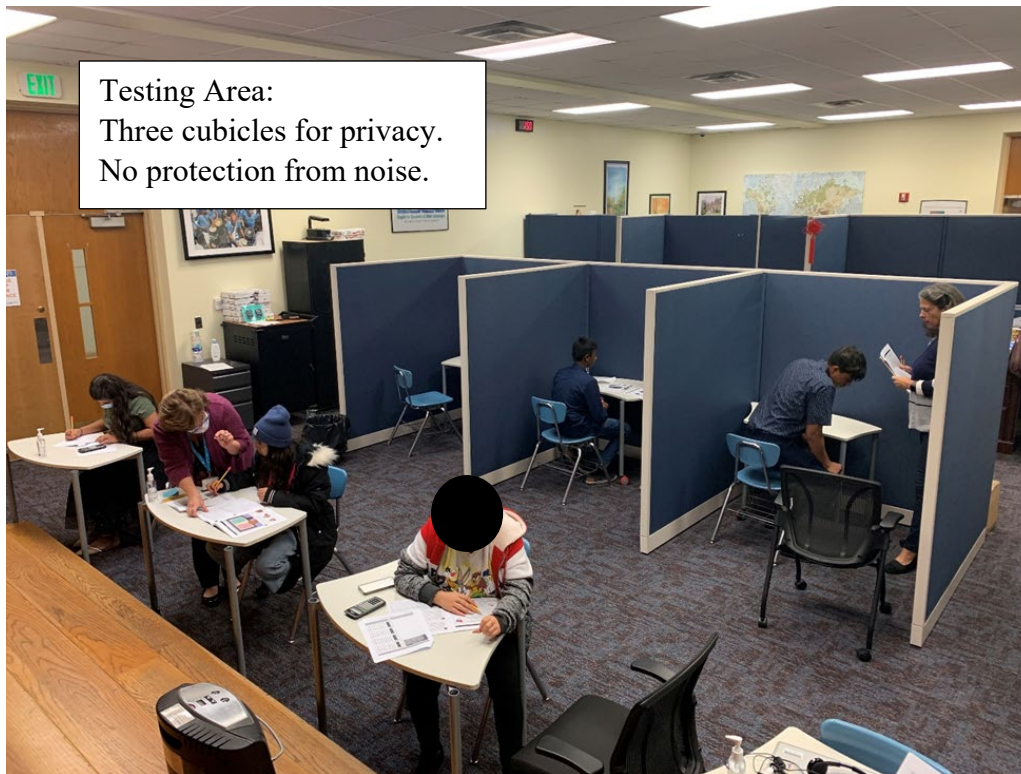
AUDIT RATING

Needs
Improvement

The ESOL office received a needs improvement audit rating for the enrollment process:

- The design of controls only partially addresses key risks.
- Controls are not operating consistently.
- Some high and medium-rated issues were identified.

See **APPENDIX C** for the audit rating definitions.
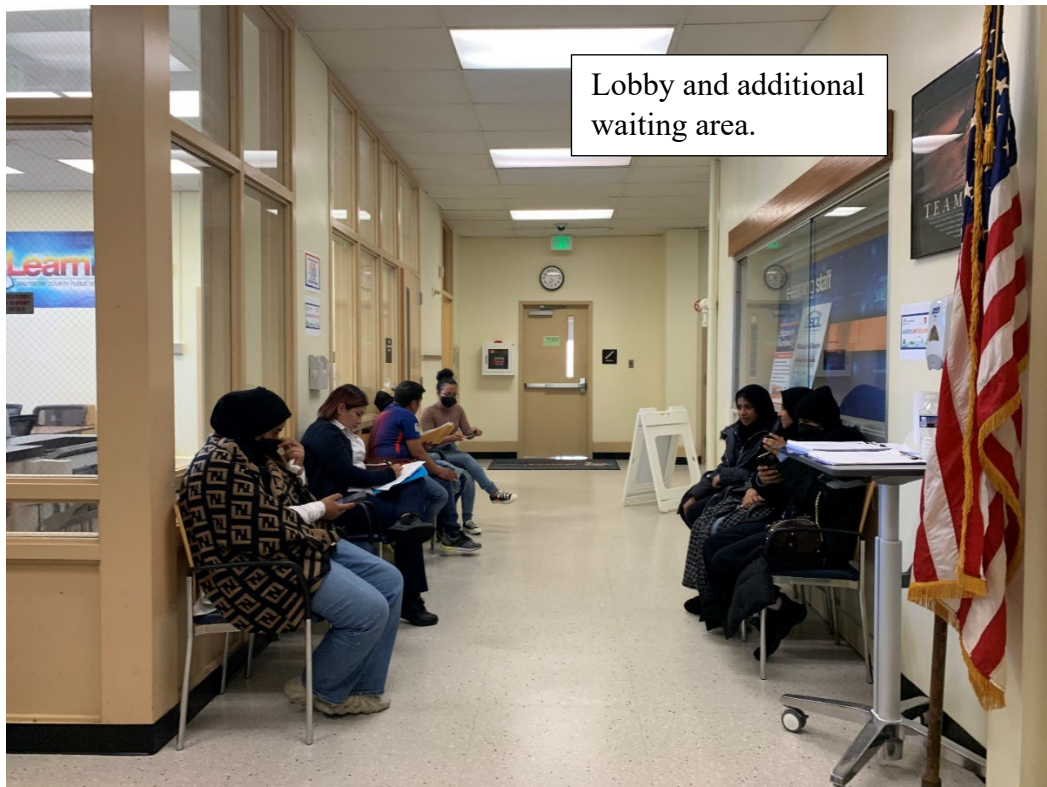
OBJECTIVE, SCOPE & METHODOLOGY

Objective

To determine if the multilingual enrollment process supports the needs of new immigrant students.

Scope

July 1, 2022 through November 30, 2022.

Methodology

To achieve the audit objectives, we performed the following:

- Planned the audit in cooperation with the ESOL staff to ensure an understanding of the multilingual student enrollment process.
- Interviewed key personnel knowledgeable of the multilingual student enrollment process.
- Reviewed COMAR and relevant SOPs.
- Evaluated risks and controls over the multilingual student enrollment process.
- Performed detailed tests to support our conclusions.
  - Reviewed how the ESOL office communicates with families to inform them of services and how to get students enrolled.
  - Determined the services offered at the Welcome Center and evaluated the testing facilities.
  - Reviewed the ESOL enrollment training materials available to school-based personnel.
  - Evaluated current ESOL office staffing levels.
  - Reviewed documentation to ensure that newly enrolled ESOL students are scheduled for ESOL instruction.
  - Reviewed documentation to ensure parental approval was obtained when EL services were refused for a newly enrolled student.
  - Analyzed data for all newly enrolled students to identify those missing required HLS information.
  - Analyzed data for all newly enrolled non-English students to identify those with missing assessment and EL status information.

APPENDIX A – Photos of the Welcome Center

Testing Area:
No privacy or
protection from noise.

Testing Area:
Three cubicles for privacy.
No protection from noise.

Family Waiting Area

Lobby and additional waiting area.

APPENDIX B – Issue Rating Definitions

Issues will be rated high, medium, or low based on these factors:

1. Level of financial impact.
2. Extent of violation of external laws, regulations, and restrictions.
3. Lack of documented policy, procedure, or noncompliance with a policy in an important matter.
4. Lack of internal controls or ineffective controls and procedures.
5. Fraud, theft, inappropriate conflicts of interest or serious waste of school system resources.
6. Significant opportunity exists for real gains in processing efficiency.
7. Poor cost controls or potential for significant savings and/or revenue generation.
8. Condition places the school systems reputation at risk.
9. Ineffective reporting and/or communication structure results in financial risks and/or inefficient operations.
10. Post audit implementation review reveals little or no effort to implement an action plan in response to a previous audit finding.

APPENDIX C – Audit Rating Definitions

Audit Rating	Definition
Unsatisfactory	**Design** - Design of controls is ineffective in addressing key risks **Documentation and communication** - Non-existent documentation and/or communication of controls/policies/procedures **Operation/implementation** - Controls are not in operation or have not yet been implemented **Compliance** - Significant breaches of legislative requirements and/or departmental policies and guidelines **Risk management** - Risks are not being managed **Issues/deficiencies** - Most issues were rated as high and urgent corrective actions are necessary
Needs Improvement	**Design** - Design of controls only partially addresses key risks **Documentation and communication** - Documentation and/or communication of controls/policies/procedures is incomplete, unclear, inconsistent, or outdated **Operation/implementation** - Controls are not operating consistently and/or effectively or have not been implemented in full **Compliance** - Breaches of legislative requirements and/or departmental policies and guidelines have occurred **Risk management -** Risks are not effectively managed which could result in failure to ensure school objectives are met **Issues/deficiencies** - Some high-rated and/or medium-rated issues were identified
Satisfactory	**Design** - Design of controls is largely adequate and effective in addressing key risks **Documentation and communication** - Controls/policies/procedures have been formally documented and are up to date but are not proactively communicated to relevant stakeholders **Operation/implementation** - Controls are largely operating in a satisfactory manner and are providing some level of assurance **Compliance** - No known breaches of legislative requirements and/or departmental policies and guidelines have occurred **Risk management** - Risks are largely effectively managed **Issues/deficiencies** - No high-rated or medium-rated issues identified