



**DEBRA K. DAVENPORT, CPA**  
AUDITOR GENERAL

**STATE OF ARIZONA**  
OFFICE OF THE  
**AUDITOR GENERAL**

**MELANIE M. CHESNEY**  
DEPUTY AUDITOR GENERAL

July 21, 2010

Members of the Arizona Legislature

The Honorable Janice K. Brewer, Governor

Governing Board  
Stanfield Elementary School District

Ms. Susan Stropko, Superintendent  
Stanfield Elementary School District

Transmitted herewith is a report of the Auditor General, a review of Stanfield Elementary School District's Structured English Immersion and Compensatory Instruction budget requests. This review was prepared pursuant to and under the authority vested in the Auditor General by Arizona Revised Statutes §15-756.12.

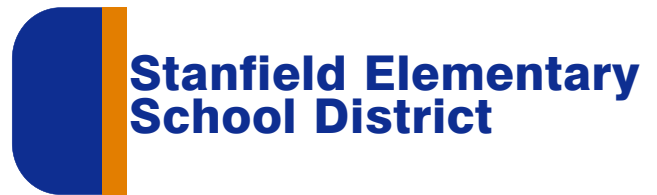
My staff and I will be pleased to discuss or clarify items in the report.

This report will be released to the public on July 22, 2010.

Sincerely,

Debbie Davenport  
Auditor General

DD:bl  
Enclosure



## ELL Review

### Summary

Stanfield ESD's Structured English Immersion (SEI) and Compensatory Instruction (CI) budget requests were supported by district records.

The District did not apply for FY 2009 SEI monies and did not incur incremental costs for implementing the SEI model. However, the District's program was not fully in compliance with the SEI model prescribed by the Arizona ELL Task Force because some ELL students did not receive the required 4 hours of language development or the 4 hours was not properly allocated between the required language development instructional areas. The District is in the process of correcting these deficiencies.

Stanfield ESD spent its FY 2009 CI monies on teacher salaries and benefits to provide extended-day classes for ELL students.



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## English Language Learner programs, costs, and funding

The Office of the Auditor General has conducted a review of the Stanfield ESD's Structured English Immersion and Compensatory Instruction budget requests pursuant to A.R.S. §15-756.12. Auditors reviewed these budget requests to determine whether district records supported them. In accordance with statute, Stanfield ESD was selected for review because its SEI program was monitored by the Arizona Department of Education. The District is located in Pinal County, about 60 miles south of Phoenix, and serves students in kindergarten through 8th grade. In fiscal year 2009, Stanfield ESD identified 182 of its 687 students as English language learners.

### Background

English Language Learners are students whose native language is not English and who are not currently able to perform ordinary classroom work in English. ELL students are identified through a state-adopted language proficiency test. School districts are required to administer this test to students if the primary language spoken at home is other than English, and then retest annually those students identified as ELL. School districts must then report the test results to the Arizona Department of Education (ADE).

By reporting their numbers of ELL students, districts are eligible for additional monies for ELL programs through the State's school funding formula (known as ELL Group B Weight monies) and the federal Title III program. In addition, school districts may submit budget requests to ADE for monies to implement SEI and CI programs. SEI provides English language development during the normal school day, while CI provides English instruction outside of the normal school day in

### Levels of English Language Proficiency:

**Pre-emergent**—Student does not understand enough language to perform in English.

**Emergent**—Student understands and can speak a few isolated English words.

**Basic**—Student may understand slower speech, and speak, read, and write simple words and phrases, but often makes mistakes.

**Intermediate**—Student can understand familiar topics and is somewhat fluent in English, but has difficulty with academic conversations.

**Proficient**—Student can read and understand texts and conversations at a normal speed, and can speak and write fluently with minor errors.

Source: Arizona Department of Education.

programs such as after-school tutoring and summer school. However, if a district's Group B Weight monies are sufficient to cover the incremental costs of its SEI program, no additional SEI monies are awarded through the budget request process.

## Fiscal year 2009 SEI program

**FY 2009 SEI budget request not submitted**—The District did not apply for fiscal year 2009 SEI monies. According to district officials, they completed a budget request but did not submit it to ADE because it did not appear that the District would be eligible for SEI monies. The budget request form identified certain state and federal monies the District received for ELL programs as offsets to requested monies. Therefore, because the District's incremental costs to implement the model were less than these offsets, district officials believed they were not eligible for SEI monies. Although the budget request forms included federal and state offset amounts, ADE's final budget approvals were only offset by state ELL Group B Weight monies. Based on ADE's calculations for incremental costs, the District could have qualified for at least \$91,000 in SEI monies.

Incremental costs are the costs, as defined by the ELL Task Force, that are associated with an SEI program and that are in addition to the normal costs of conducting programs for English proficient students.

**SEI program was not fully in compliance with model requirements**—In May 2009, ADE monitored the District's SEI program and found that the District had not properly implemented some aspects of the SEI model. Figure 1 provides an overview of the model requirements for Arizona school districts. The Department found that, of the eight SEI classrooms observed, seven did not provide the required 4 hours of English language development and all eight did not correctly allocate instructional time to the English language development areas prescribed by the SEI model. Further, ILLPs were found to be generic instead of addressing the student's individual needs and also did not demonstrate how the student would receive 4 hours of English language development.

**No fiscal year 2009 SEI incremental costs**—Although the District operated an SEI classroom in almost every grade level, it did not hire additional teachers and did not incur additional costs. However, due to the class size limitations set by the SEI model, some ELL students were not placed in SEI classrooms. Had the District fully implemented the SEI model, it would have had to hire additional teachers to create more SEI classrooms, and thereby would have incurred incremental costs.

Figure 1: Structured English Immersion Model Requirements

- **English language development (ELD) components**—Students receive 4 hours of ELD instruction daily in the following instructional areas: oral English and conversation, grammar, reading, writing, and vocabulary.
- **Grouping requirements**—ELL students are placed into SEI classrooms according to ELL proficiency level in class sizes not exceeding the non-ELL average class size in the district. In addition, the following maximum class sizes apply:
  - Pre-Emergent and Emergent—23
  - Basic and Intermediate—28
- **Teacher qualifications**—All teachers in SEI classrooms must be highly qualified and have an SEI, English as a Second Language, or Bilingual endorsement. Additionally, SEI teachers at the middle school and high school level must be highly qualified in English or language arts.
- **Individual Language Learner Plans (ILLP)**—Schools with 20 or fewer ELL students within a three-grade span may choose to create ILLPs for those students. These students may be placed in classrooms with English-proficient students. The ILLPs should detail how each individual student will receive the 4 hours of ELD instruction in this setting.

Source: *Structured English Immersion Models of the Arizona English Language Learners Task Force-5/14/08* and *Arizona Department of Education Guidance on ILLP 8/2008*.

## Fiscal year 2010 SEI program

Fiscal year 2010 SEI budget request is supported—Stanfield ESD’s 2010 SEI budget request is supported by District records. Its records adequately support the number of ELL students, proficiency levels, and average class sizes used to determine the District’s SEI budget. The request was approved by ADE in February 2009 and, along with Group B Weight monies, includes salaries and benefits for 2.6 incremental teachers, teacher-training costs, and instructional materials.

Additional changes needed to meet SEI model requirements—ADE conducted a follow-up review of the District in September 2009 and determined that the District still had outstanding issues that needed to be corrected to meet SEI model requirements. Specifically, ADE observed that some ELL students were not receiving the required 4 hours of language development and the time was not properly allocated among the language development areas prescribed by the model. The Department also noted that in some cases, ILLPs were used when students should have been placed in SEI classrooms.

### Approved SEI Budget Fiscal Year 2010

<b>Costs:</b>	
Incremental teacher salaries	\$116,914
Incremental teacher benefits	29,229
Textbooks, instructional aids, and assessments	90
Transportation for itinerant teachers	0
Travel expenses for training—administrators	0
Travel expenses for training—teachers	3,780
Teacher stipends for training time outside of regular school days	0
Classroom substitutes	0
Other expenses	<u>0</u>
Total incremental costs	150,013
<b>State and local offsets:</b>	
ELL “Group B Weight”	<u>61,434</u>
<b>Net budget request</b>	<b><u>\$88,579</u></b>

## Fiscal year 2009 CI program

CI budget request is supported—For fiscal year 2009, Stanfield ESD requested and was approved by ADE for a CI budget of \$43,053 to provide extended-day classes for ELL students during the school year. Based on district projections of program participation, optimal class sizes, program schedule, and estimated hourly salaries and benefits, auditors determined that the District’s budget request was supported.

In creating its budget request, the District estimated about 100 participants in its extended-day classes. It projected that seven teachers would be needed to provide the extended-day classes four days a week, for 1.75 hours each day. Teachers would be paid \$25 per hour plus related benefits. The instruction was to focus on reading, writing, grammar, listening, and speaking objectives from the English Language Proficiency Standards. The classes were budgeted to last about 30 weeks.

Fiscal year 2009 CI monies were spent for purposes requested—The District spent \$14,235 of its CI budget on teacher salaries and related benefits to provide extended-day classes for ELL students. Classes were offered four days per week, 2 hours per day. However, the District spent significantly less than it projected because classes did not begin until January 2009 and five classes were offered instead of seven. According to district officials, they were not able to find enough qualified teachers willing to take on the additional hours to offer more classes.

Unspent fiscal year 2009 CI monies remained with the District and offset future budget requests.



**Stanfield Elementary  
School District**

A copy of the full report is available at:

[www.azauditor.gov](http://www.azauditor.gov)

Contact person:

Mike Quinlan (602) 553-0333

**ELL REVIEW**

July 2010