

To: The Governor's Early Childhood Funding Commission

From: Latino Policy Forum

Date: October 13, 2020

Memo: Public comment on prioritizing English Learners in the early care and education system

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The Latino Policy Forum (the Forum) would like to thank the members of the Governor's Early Childhood Funding Commission for taking the time to review and weigh the different considerations brought forward during this process. My name is Rebecca Vonderlack-Navarro, I am the Director of Education Policy and Research for Forum. The Forum is a statewide non-profit advocacy organization. The Forum seeks to inform, influence, and lead public policy debates in the areas of early childhood and bilingual education, given these are vital services to promote positive outcomes for Illinois Children.

- **Close to one-third** of our state preschool population are designated ELs (28%)
- In Illinois, 76% of ELs are Spanish-speaking

The Forum appreciates the thoughtful consideration of the Commission and its subcommittees on how we can provide more coherence to early childhood funding and programming. We deeply understand the need for reimagining how early childhood services and programs are governed in our state and for the potential of a new governance structure. The new structure has a laudable potential to both elevate the importance of early childhood and provide transparency on data. While we see the benefits, we also see the many complicated nuances to implementing a new governance structure. We draw particular concern on the ability to provide adequate oversight to the needs and legal requirements to adequately serve linguistically and culturally diverse young children.

**The Forum understands and is generally supportive of some of the proposed benefits of consolidating various components of the early childhood system. We appreciate the work of various subcommittees to outline some high-level concepts of how this new governance structure might function. However, in this case, the Forum cannot neither support nor oppose a new early childhood governance structure until some critical questions are answered. We feel that it is important to have a framework of what will be required for consolidation. The framework should include important details such as how many programs and staff will be included, the implications for the different unions, what statutes will need to change, etc.**

**More specifically, we feel we are lacking important information, particularly as it relates to English Learners who make up close to one-third of preschool enrollment, that is 22,769 students (ISBE Illinois Public School Enrollment 2017-18 data). The English Learner population (28%) must be a central part of the overall design of the new governance structure. There are both federal and state requirements for educating English Learners that are part of Civil Rights Law and Article 14C of the school code. Adherence to these requirements is not a granular detail to be considered afterwards. We respectfully request:**

- **Acknowledgement in the Funding Commission's final report of the need to answer these questions.**

- **Specific priority to ELs in future deliberations on the implementation of the Commission’s recommendations.**

The Forum is willing to be a thought partner in this process. The Forum strongly believes the questions posed in this document could inform decision-making, planning, and stakeholder input processes as the commission’s moves to finalize its recommendations for the governor. This document is organized as follows:

- *Questions specific to serving English Learners*
- *General questions regarding the feasibility of such a large governance change.*

## **I. Considerations specific to English Learners in Preschool**

Context:

Last year English Learners comprised close to one-third of students served in Preschool programming. Ensuring linguistically and culturally responsive educational programming will need to be a critical consideration for any changes to early childhood governance.

It is important to note that preschool programs are included in Article 14C of the Illinois School Code and therefore bilingual education is mandated for young ELs. As preschool intends to augment kindergarten readiness, it is critical that early learning be aligned with elementary instruction. Article 14C of the Illinois School Code stipulates that schools with 20 or more students enrolled who speak the same language other than English must receive instruction in their native language for the majority of their day. Funding for bilingual programs is administered by the Multilingual Department at the Illinois State Board of Education. There is a staff person in Early Childhood that works closely with the Multilingual Department to improve understanding of preschool and the need for bilingual funding at the preschool level. Below are considerations for English Learners students in preschool:

### **Federal and State Requirements for Serving English Learners**

- If a new governance structure is created, how will the state adhere to Article 14C of school code?
- If a new governance structure is created, how will Civil Rights and Federal Requirements for English Learners be guaranteed in the programs offered?

### **State and Federal Funding Sources Specific to English Learners**

- How will a new governance structure account for the EL cost factors within the Evidence-Based Funding formula (*this is not included in Slide #29 of the Management and Oversight subcommittee 10/1/20*)? ELs within PFA get some of the EL allotment (this is not a categorical line item, but is an embedded factor within the formula.)
- Currently ELs in PFA in school settings also are eligible for Title I, II, III and IV money (e.g. can support professional development, parent liaisons, etc.) (*These funding streams are not included in Slide #29 of the Management and Oversight subcommittee 10/1/20*). How would we ensure ELs at the early childhood level still get this money and who would

provide oversight? How will we ensure that local level decision making remains unaffected?

### **Evaluation of Program Quality for Serving English Learners**

- If QRIS is used to evaluate programming, how will language and cultural diversity be considered?
  - In the past, staff could pursue the Linguistic and Cultural competency award. Centers that desired to provide linguistically and culturally responsive practices could use professional learning opportunities to study the standards and descriptors in the former Linguistic and Cultural Diversity credential. How would language and cultural competencies be considered moving forward?

### **Alignment of English Learner education from ECE to K-12**

- The work to align the birth to preschool work with kindergarten needs to continue to provide smooth transitions into the K-12 system. Given Kindergarten will stay at ISBE, how will a process for kindergarten transitions be considered?
- Who would oversee educator licensure and would early childhood educators still be required to pursue a Professional Educator License from ISBE?
  - If a new governance structure is created, how can we ensure a linguistically and culturally responsive workforce? Research contends that the single most important factor for optimal EL achievement is a highly qualified bilingual teacher. Language and cultural competencies are a part of the bilingual endorsement issued by ISBE.
  - How will we track workforce needs if licensure is no longer part of ISBE?

### **Critical Stakeholder engagement**

Considerations for engaging multiple stakeholders in the process are critical for ensuring the success of any potential changes to early childhood. The Forum contends that it is critical to engage with the following:

- ISBE's head of Multilingual Services
  - ISBE's head of Finance to consider implications to EBF if elements of the formula that pertain to ELs in PFA are moved to a different agency for oversight
  - EL Directors that oversee adherence to Article 14C
  - School districts serving large numbers of ELs within preschool – Chicago and Elgin are essential to consider
- Will school administrators and school board members still have oversight over PFA? How might this change?
  - Would bilingual parents still be served through mandated Bilingual Parent Councils?

## **II. Some General Questions**

- How many states have this type of structure? What have been the advantages of this structure?
- How will the responsibilities be shared between ISBE, DHS, and DCFS and this new structure?

- How will communication be set up?
- How will this new governance system ensure a smooth transition into the K-12 system if it is separate?
- How will the new governance structure reduce redundancies in requirements, such as building inspections, surveys, paperwork, reports, fiscal management, etc.
- We would like more detail on the recommendation for a funding intermediary within the new structure. How will this be the same or different than the intermediary funding structure at Chicago's Department of Family and Support Services?