

## STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



**TO:** Superintendents of Schools

**FROM:** Dr. Gladys Labas, Director of Equity and Language

**DATE:** May 10, 2021

**SUBJECT:** Enrollment of Newcomers Guidance

The Connecticut State Department of Education (CSDE) acknowledges and values the rich language and cultural experiences that all students bring to our schools, including background knowledge, linguistic skills, and academic achievements. We also know that the COVID-19 pandemic has displaced many students and families. Therefore, we feel that it is essential for school districts to engage in a consistent and thoughtful approach to translating foreign transcripts when enrolling new students to your districts.

The Enrollment of Newcomers Guidance document is designed to provide you with tools and guidance that will assist district administrators in the development and implementation of policies and practices related to enrolling new students.

If you have any questions please contact Dr. Gladys Labas, Director of Equity and Language at 860-996-1470 or via e-mail at <u>Gladys.Labas@ct.gov.</u>

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# **Enrollment of Newcomers Aligning Academic Credentials**

The Connecticut State Department of Education (CSDE) acknowledges the rich experiences that English Learners ("ELs") bring to our schools, including background knowledge, linguistic skills, and academic achievements. It is essential that school districts engage in a consistent and thoughtful approach to translating foreign transcripts that will most accurately identify and understand an EL's prior academic background. This, in turn, will poise the student for graduation from Connecticut's schools.

This document provides tools and guidance for school districts developing policies related to placement of newcomers. While this guidance document is valuable for all school levels, it is geared toward high school personnel updating, creating, and/or implementing policies related to enrollment of ELs who are new to the United States school system. The <a href="CSDE">CSDE</a> has previously issued guidance reminding school districts of the importance of ensuring that their enrollment policies and practices do not discriminate and do not discourage or chill enrollment and access. In addition to considering this document, and previously published guidance, please carefully review the federal guidance from the U.S. Department of Justice Civil Rights Division and U.S. Department of Education Office for Civil Rights outlined in their "<a href="Dear Colleague">Dear Colleague</a> Letter dated January 7, 2015.

## **Transcripts Unavailable**

If no transcripts or formal records are immediately available for a student enrolling in the school district, temporary placement may be made using the 'Grade Placement by Age' chart found on the next page. These age/grade-level parameters help to ensure that students are not placed in a grade level below their age, which may result in minimizing the student's ability to meet grade-level standards and graduation requirements within a reasonable amount of time. According to federal guidance, careful consideration should be taken into account when determining grade placement for students with interrupted or limited formal education (SIFE/SLIFE). The Newcomer Toolkit released by the U.S. Department of Education defines a SIFE/SLIFE as "students in 4th-12th grades who have experienced disruptions in their education in their native countries and/or the United States such that they are one or more years behind their grade-level peers academically, and/or are unfamiliar with the ultra of schooling" (U.S. Department of Education, 2016).

Grade Placement by Age	
Age	Level assigned
5-10 years old	Elementary school
11 years old	Elementary school or middle school depending on grade level configuration of the foreign school
12-13 years old	Middle School
14 years old	Middle school or high school depending on grade level configuration of the foreign school
15 years old and older	High school

Local policy should include a clear approach to deal with instances where there is conflicting information about student placement, after consultation with an interdisciplinary team, such as the school counselor, Bilingual/ESL Supervisor, and principal.

Note that if it is suspected that the child may be a child with a disability, both the Regulations of Connecticut State Agencies (R.C.S.A.) Section 10-76d and the federal Individuals with Disabilities Education Act of 2004 (IDEA 2004) require that the child be referred to a planning and placement team (PPT) for review. Again, all persons should be familiar with the Office for Civil Rights guidance detailed in the "Dear Colleague" Letter dated January 7, 2015 based on a 2016 memo and also referred to in this CSDE memo regarding grade placement for high school-aged SIFEs. It would be inappropriate for a high-school aged student to be placed in middle school. In certain instances, additional information may be obtained from the sending school. Obtain contact information about the sending school during the parent/student interview or contact the school through the consulate office or directly from an online search. Information can also be obtained from parents/guardians to help support proper grade placement for newcomers to the district. If a student enrolls in the school district and information is necessary to support proper placement, additional evaluation, including interviews with parents and students, may be necessary, particularly in the context where students come from emergencies. Authenticating documents in the more traditional process may not be practical in some circumstances, such as a student arriving from a refugee camp or another temporary location. Interviews may help clarify which classes taken in the home country may align with courses in Connecticut. It is also an opportunity to get to know the student and the parent/guardian and understand additional needs and services that may influence program placement and services.

**Note:** An interview with parents/guardians should not be omitted because of a language barrier. Federal guidance from the U.S. Department of Justice Civil Rights Division and U.S. Department of Education Office for Civil Rights outlined in the "Dear Colleague" Letter dated

January 7, 2015 delineates a school district's obligation to ensure meaningful communication with "Parent/guardians whose primary language is other than English and who have limited English proficiency in one of the four domains of language proficiency (speaking, listening, reading, or writing)" (p. 37). Communication must be in a language that is understandable to the limited English proficient (LEP) parent about any program, service, or activity of a school that is called to the attention of a non-LEP parent (ESEA §1118(b) (1)). If language is a barrier, the school district should ensure they have an appropriate and qualified interpreter available.

### **Foreign Transcripts**

Students new to the country may enter the Connecticut school system with academic credits earned from a country other than the United States. Aligning courses from another country with content courses in Connecticut may present a challenge; however, several best practices should be employed to ensure students obtain credits for courses they have successfully completed. This is a critical step in the registration process as credits may count toward graduation requirements. A thorough review of transcripts ensures a student does not repeat coursework unnecessarily, which can preclude graduation in a timely manner.

Each district must have a process for enrolling ELs. This process should include the home language survey, a records review process, and multiple indicators for identification, which must include native language assessments to determine appropriate placement. Therefore, a district must have a process on academic records review, which includes credit transfers, transcript translations, and appropriate grade placement and program service identification. ("Dear Colleague" Letter dated January 7, 2015).

As part of implementing this process, a district must develop an evaluation procedure to translate foreign transcripts and apply earned credits to the entering student's academic record. The procedure must outline each step for translating and evaluating foreign transcripts, include guidelines for successful completion of evaluating transcripts, and detail resources for assisting school personnel with evaluating foreign transcripts. The following steps can be used:

- Determine the person(s) responsible for evaluating foreign transcripts (evaluator);
- Establish a timeframe for the evaluation (consider state and federal timelines for identification of services, including EL placement and special education);
- Develop specific steps and consideration for the evaluation;
- Carefully examine all official documents for authenticity;
- Ensure that translations are provided by a qualified source;
- Contact the sending school, embassy, ministry of education, or other authorized agencies, when necessary; and
- Interview entering students and their parents/guardians.

Once this procedure is developed, anyone charged with evaluating foreign transcripts should become familiar with it and apply it for each student who is new to the country.

Schools should identify a person responsible for evaluating foreign transcripts. This person should have:

- 1. Cultural capacity to work with families and students from another country;
- 2. Experience with and/or knowledge of educational systems abroad, including grade levels, grades, and promotion equivalency; and
- 3. Experience and/or knowledge of federal and state statutes and regulations, civil rights obligations, and district policies.

## Do's & Don'ts – You may wish to consider the following non-exhaustive list when translating and evaluating foreign transcripts.

#### • Do:

- 1. Ensure the person responsible for evaluating transcripts examines the documents for authenticity.
- 2. Interview the student and parent/guardian to review the transcript and prior studies in order to obtain clarification.
- 3. Determine eligibility for course equivalency.
- 4. Update credit transfer on student's official transcripts.

#### Considerations:

- 1. Ensure a competent translator (see agencies on the following page) translates transcripts in a language other than English.
- 2. Consult with district supervisor of EL who has to assist with conversion of grade levels.
- 3. Notify and consult with receiving teachers and department supervisors.
- 4. Establish a procedure for informing the student and parent of the results of the evaluation.

### • Don't:

- 1. Accept documents with alterations not original to the document or inconsistencies. In these circumstances, further verify the authenticity of the documents.
- 2. Use family members or students to translate documents.
- 3. Accept paraphrased or interpretive translations or evaluation of information.
- 4. Delay or deny grade and program placement.
- 5. Use language as a reason for not communicating with parents.

The following private agencies provide foreign credential evaluation services for varying fees. This is not an exhaustive list and does not represent endorsement by Connecticut State Department of Education.

## Center for Applied Research Evaluation & Education, Inc.

P. O. Box 18358 Anaheim, CA 92817 Phone: 714-237-9272

## **Educational Credential Evaluators, Inc.**

P.O. Box 541070 Milwaukee, WI 53203-3470 Phone: 414-289-3400

#### **Education Evaluators International**

120-34 Queens Blvd., Suite 300 Kew Gardens, NY 11415 Phone: 401-521-5340

## **Educational Perspectives**

P.O. Box A3462 Chicago, IL 60661-3462 Phone: 312-421-9300

## **Educational Records Evaluation Service**

601 University Avenue, Suite 127 Sacramento, CA 95825-6738 Phone: 916-921-0790

#### **Evaluation Service, Inc.**

333 W. North Avenue, Suite284 Chicago, IL 60610-1293 Phone: 847-477-8569

## Foreign Academic Credentials Service (FACS), Inc.

P.O Box 400 Glen Carbon, IL 62034 Phone: 618-656-5291

## Foundation for International Service, Inc.

505 5th Avenue South, Suite 101 Edmonds, WA 98020

Phone: 425-248-2255 ext. 10

## **Globe Language Services, Inc.**

305 Broadway, Suite 401 New York, NY 10007 Phone: 212-227-1994

#### **International Consultants of Delaware**

3600 Market Street, Suite 450 Philadelphia, PA 19104-2651

Phone: 215-243-5858

## **International Education Research**

Foundation, Inc. P.O. Box 3665

Culver City, CA 90231-3665 Phone: 310-258-9451

#### **International Education Consultants**

7101 SW 102 Avenue Miami, FL 33173 Phone: 305-273-1616

#### **Span Tran: The Evaluation Company**

2400 Augusta Drive, Suite 451 Houston, TX 77057

Phone: 713-266-8805

### **World Education Services**

Attention: Document Center

P.O. Box 5087

New York, NY 10274-5087 Phone: 212-966-6311