



California Department of Education Federal Program Monitoring 2018-19 Notification of Findings

November 01, 2018

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

Local Educational Agency: Santa Rosa High (49709200000000)

Review Date(s): 10/29/2018 - 11/01/2018

Regional Team Leader(s): Seyed Dibaji, 916-319-0375

FPM Coordinator(s): Sarah Cranke, 707-528-5788

| Program Reviewed | Program Reviewer | Total Findings |
|----------------------------------|---------------------------|----------------|
| Compensatory Education (CE) | Chimeng Yang, Paula Evans | 7 |
| Career Technical Education (CTE) | Robert Wilson | 0 |
| Education Equity (EE) | Murjani McTier | 8 |
| English Learner (EL) | Suzie Dollesin | 14 |

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 12/16/2018. Corrective actions made to resolve findings must be implemented at all sites in the LEA and the new procedures must be used in the future.

When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Resolution Agreement" process via CMT. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

NOTE: Copies of this report were distributed to the Agency. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

| Sites Reviewed | Programs Reviewed |
|-------------------------------------------|-------------------|
| Elsie Allen High (49709204930160) | CE, CTE, EL |
| Hilliard Comstock Middle (49709206068977) | EL |
| Santa Rosa High (49709204936803) | CE, CTE |



Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

Monitoring Results by Program

Compensatory Education

1. CE 02: School Parent and Family Engagement Policy

With approval from the local governing board, each Title I school shall jointly develop with, and distribute to, parents and family members of Title I students a written parent and family engagement policy, agreed upon by such parents, and updated periodically to meet the changing needs of parents and the school. This includes sub-items 2.1, 2.2, 2.3, and 2.4. The school-parent compact shall be jointly developed with and distributed to parents of Title I students. The school-parent compact shall outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and describe the means by which the school and parents will build and develop a partnership to help children achieve the state content standards.

The LEA submitted a school-parent compact from Santa Rosa High for review, but it did not address the legal requirements, particularly CE 2.4 (a), for the school's responsibility. Also, there was no evidence showing distribution of the compact to parents. The LEA did not submit the required School-level Parent and Family Engagement Policy from Santa Rosa High and Elsie Allen High to address the legal requirements. No school-parent compact was submitted from Elsie Allen High to address the requirements.

The LEA must upload evidence to show that Santa Rosa High and Elsie Allen High have jointly developed with, and distributed to, parents of Title I students a written School-level Parent and Family Engagement Policy that includes sub-items 2.1, 2.2, 2.3 and 2.4, agreed upon by such parents, and updated periodically to meet the changing needs of parents and the school and a School-parent Compact. The evidence must include the following documents: 1) School-level Parent and Family Engagement Policy and School-parent Compact from Santa Rosa High and Elsie Allen High School, 2) meeting minutes, sign-in sheets, and agendas, and 3) documents or evidence attesting the distribution of School-level Parent and Family Engagement Policy and School-parent Compact to all parents of Title I, Part A students at the sample schools.

2. CE 04: Monitoring Local Educational Agency Planning Efforts

To ensure that all children receive a high-quality education, and to close the achievement gap between children meeting the challenging state academic standards and those children who are not meeting such standards, each LEA planning document shall describe how the LEA will monitor students' progress in meeting the challenging state academic standards by carrying out the following requirements: (a) Developing and implementing a well-rounded program of instruction to meet the academic needs of all students, (b) Identifying students who may be at risk for academic failure, (c) Providing additional educational assistance to individual students the LEA or school determines need help in meeting the challenging state academic standards, and (d) Identifying and implementing instructional and other strategies intended to strengthen academic programs and improve school conditions for student learning. The LEA must

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

periodically review and, as necessary, revise its district level planning documents, which must remain in effect for the duration of the LEA's participation under this part. The LEA must describe how it will identify and address any disparities that result in low-income students and minority students being taught at higher rates than other students by ineffective, inexperienced, or out-of-field teachers.

The LEA did not submit a district level planning documents to address the above requirements. The lack of district level planning documents indicated that Title I funds are used without a plan or a mechanism containing academic goals and strategies to address the academic needs of Title I students, particularly those at risk of not meeting academic standards.

The LEA must submit a district planning document that includes academic goals and district-level activities along with a brief description of each activity for Title I funds that have been implemented, monitored, reviewed, and evaluated to help low-achieving students meet academic proficiency. The estimated cost must be stated for each activity. The total amount of Title I, Part A funds must reflect the amount of required and allowable reservations including the 15% admin allocated via the 2017-18 Consolidated Application and Reporting System (CARS). All activities/actions supported by Title I, Part A funds must align with the intents and purposes of the funds.

3. CE 08: Title I or Title III for Supplemental Language Instruction

The LEA must, no later than 30 days after the beginning of the school year, inform parents of an English learner (EL) identified for participation or participating in such a program, of the following:

- (a) Reasons for the student's identification as an EL and the need to participate in a language instruction educational program.
- (b) Student's level of English proficiency, how such level was assessed, and the status of the student's academic achievement.
- (c) Methods of instruction used in the program and in all other available programs, including how such programs differ in content, instructional goals, and the use of English and native language instruction.
- (d) How the program will meet the educational strengths and needs of their student.
- (e) How the program will help their student learn English and meet age-appropriate academic achievement standards for grade promotion and graduation.
- (f) Specific exit requirements of the program.
- (g) In the case of a child with a disability, how the program meets the objectives of the individualized education program of the student.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

(h) Information pertaining to parental rights that includes the following guidance:

i. Detailing the right that parents have to have their child immediately removed from such program upon request.

ii. Detailing the options that parents have to decline to enroll their child in such program or to choose another program or method of instruction, if available.

iii. Assisting parents in selecting among various programs and methods of instruction, if more than one program or method is offered by the eligible entity.

For those children who have not been identified as ELs prior to the beginning of the school year, the LEA shall notify parents within the first two weeks of the child's placement in the language instruction educational program.

The LEA must implement effective means of outreach to parents of ELs to inform the parents how they can be involved in the education of their children and be active participants in assisting their children to attain English proficiency, achieve at high levels within a well-rounded education, and meet challenging state academic standards expected of all students, including holding, and sending notice of opportunities for, regular meetings for the purpose of formulating and responding to recommendations from parents of students assisted under Title I, Part A or Title III.

The LEA submitted a blank initial parent notification letter for review; however, the letter did not address all legal requirements. The LEA has not provided Title I/Title III initial and annual parent notification letters sent to parent of English learners that meet all of the above requirements.

To address the legal requirements the LEA must upload one initial filled out and one annual filled out Title I/Title III parent notification letters that meet all of the above requirements sent to parents of English learners. The LEA must redact the student's name from the letters. These letters must be uploaded in both English and Spanish.

4. CE 09: LEA Disburses Funds Consistent with Consolidated Application and Reporting System (CARS)

The LEA must disburse Title I, Part A funds in accordance with the approved CARS. The LEA must expend Title I, Part A funds reserved in CARS for the stated and approved purpose of the reservation to serve only Title I participating students. For programs funded by Title I, Part A, the LEA shall use no less than 85 percent of those apportionments at school sites for direct services to students.

A review of documentation including 2018-19 SPSA, SSC meeting minutes, agendas, and sign-in sheets, 2017-18 expenditure reports, and 2017-18 CARS Title I, Part A School Allocations as well as interviews with district and site staff revealed that the LEA did not disburse Title I, Part A funds to Santa Rosa High and Elsie Allen High in accordance with the 2017-18 approved CARS. For instance, the 2017-18 CARS showed that Santa Rosa High received \$262,637.37; however,

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

the 2018-19 SPSA budget page showed \$130,500 and the school budget as of October 3, 2018 showed \$130,383. The discrepancy amount between the allocation from 2017-18 CARS and the SPSA is \$132,137.37. The 2017-18 CARS showed that Elsie Allen High received \$224,748.29; however, the SPSA budget page showed \$145,000; The discrepancy amount is \$79,748.29. The expenditure reports from the reviewed schools did not provide information regarding the LEA's 2017-18 allocation to Santa Rosa High and Elsie Allen High. School site staff, including SSC members, did not have any knowledge or information indicating that the schools received their 2017-18 entitlements. Therefore, the sample schools did not receive their allocation according to the 2017-18 approved CARS. The LEA did not submit fiscal evidence (not from CARS) showing total site allocation of Title I, Part A funds for each sample school for 2017-18.

The uploaded fiscal documents including the 3010 detailed general ledger for 2017-18 and 2018 -19 from the district office and two sample schools did not provide sufficient information to determine the use of Title I funds. The reviewers could not determine if the LEA and reviewed schools used Title I funds according to the intended purpose of the funds.

The LEA must submit fiscal documents (not from CARS) showing total site allocation of Title I, Part A funds for Santa Rosa High and Elsie Allen High for 2017-18. If there is a discrepancy between the allocation from CARS and the district allocation, the LEA must address this issue by allocating the entitlement of Title I funds to each sample school according to the 2017-18 approved CARS and submit the following documents for review:

1. District fiscal documents showing the transfer of funds to each sample school's Title I account to address the discrepancy between the allocations via 2017-18 CARS and LEA Title I site 2017 -18 allocations.
2. A memo from the district to provide direction to the sample schools on the use of Title I funds to provide direct services to address the academic needs of Title I students, particularly those at risk of not meeting academic content standards. The principal at each sample school must sign and date the memo to confirm that they receive the funds. The LEA must upload the signed memo for review.

The LEA must upload Title I, Part A funds expenditure reports in an EXCEL spreadsheet for the last 12 months for object codes 1000s, 2000s, 4000s and 5000s (please do not include other object codes, other non-Title I funds, and non-reviewed schools) and create a column on the right to briefly explain the intended purpose of the expense for each line item. Please separate the EXCEL spreadsheet by the district and each reviewed school.

After reviewing the expenditure reports, CDE will determine whether the expenses are allowable under Title I. If an activity is not allowable under Title I, CDE will inform the LEA to complete a journal entry to reverse the funds back to the Title I account for other allowable uses.

5. CE 16: LEA Evaluates Effectiveness of Programs

The LEA must annually evaluate the effectiveness of the activities funded by the Title I program using academic assessment criteria developed by the local governing board as described in the

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

district level planning documents, including the results from state assessments and other available measures to determine whether schools are making progress. Additionally, LEA must review the effectiveness of the actions and activities included in the district level planning documents and the SPSA; and the LEA must use the evaluation to improve the educational programs with respect to parental involvement, professional development, and other academic activities to help low-achieving students meet state academic standards.

According to the 2017-18 CARS LEA allocation, the LEA received \$2,029,363 Title I, Part A funds. The LEA reserved \$325,653 at the district office to provide district services to Title I schools. Based on a review of documentation including district expenditure reports, position control report, and 2017-18 CARS allocation as well as interviews with district staff, the LEA has not conducted an annual evaluation to determine the effectiveness of Title I funded programs/services at the district office.

The LEA must conduct an evaluation to determine the effectiveness of Title I funded activities at the district office. The evaluation must describe what is working, what is not working and include, as appropriate, specific program modifications for each activity funded with Title I funds to address the academic needs of low-achieving students and those at risk of not meeting state academic content standards based on evaluation results. Do not include non-Title I funded activities in the evaluation.

6. CE 17: SSC Evaluates SPSA Services

In a School Wide Program (SWP), the SSC must evaluate the goals and strategies described in the SPSA funded by the Title I program to determine if the needs of all children have been met, particularly the academic achievement needs of low-achieving students and those at risk of not meeting the state's student academic achievement standards.

According to the allocation from the 2017-18 CARS, Santa Rosa High received \$262,637.37 and Elsie Allen High received \$224,748.29 Title I, Part A funds. Based on a review of documentation including the SPSA annual evaluation, SSC meeting minutes, agendas, and sign-in sheets as well as interviews with SSC members and site staff at Elsie Allen High and Santa Rosa High, the SPSA annual evaluation from each sample school did not provide relevant information on the effectiveness of Title I funded programs/activities at each school.

Each sample school must conduct an evaluation to determine if the activities funded by Title I, Part A funds are helping low-achieving students meet state academic content standards. The evaluation must align with the activities specified in the SPSA and must reflect the expenditure reports. The evaluation must describe what is working, what is not working and include, as appropriate, specific program modifications for each activity funded with Title I funds to address the academic needs of low-achieving students and those at risk of not meeting state academic content standards based on evaluation results. Do not include non-Title I funded activities in the evaluation.

The LEA must submit the following documents for each reviewed school in order to address the finding:

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

1. School-level Title I program evaluation to determine the effectiveness of programs and services funded with Title I, Part A funds. (Note: Do not include non-Title I funded activities in the evaluation).
2. SSC meeting minutes, agendas, and sign-in sheets showing their involvement in evaluating the effectiveness of programs and services funded with Title I funds.
3. Specific program modifications based on evaluation results.

7. CE 18: Teacher Requirements

LEAs will ensure that all teachers working in Title I funded schools meet applicable state certification and licensure requirements.

The LEA did not submit any evidence to address the above requirement.

The LEA must upload a list (table) of teachers and credentials for Santa Rosa High and Elsie Allen High containing the following information: full name, credential(s), current assignment(s), and years of teaching experience.

Career Technical Education

No program findings resulted from this monitoring review. No further action is required.

Education Equity

1. EE 01: Administrative Requirements

The local educational agency (LEA) adopted a policy that prohibits discrimination, harassment, intimidation, and bullying based on actual or perceived ancestry, age, color, disability, gender, gender identity, gender expression, nationality, immigration status, race or ethnicity, religion, sex, sexual orientation, or association with a person or a group with one or more of these actual or perceived characteristics. The policy shall include a statement that it applies to all acts related to school activity or school attendance within a school under the jurisdiction of the superintendent of the school district. The LEA adopted and implemented a complaint process to receive, investigate, and resolve allegations of discrimination, harassment, intimidation, and bullying based on actual or perceived ancestry, age, color, disability, gender, gender identity, gender expression, nationality, immigration status, race or ethnicity, religion, age, sex, sexual orientation, or association with a person or a group with one or more of these actual or perceived characteristics, and shall include, but is not limited to, the following:

- (a) Requirement that school personnel take immediate steps to intervene when safe to do so when he or she witnesses an act of discrimination, harassment, intimidation, or bullying.
- (b) A

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

timeline for the investigation and resolution of complaints of discrimination, harassment, intimidation, or bullying that all schools under the jurisdiction of the district will follow. (c) Provide an appeal process to the complainant should he or she disagree with the resolution of the complaint. (d) All forms created relative to this process shall be translated pursuant to EC § 48985. Publicized policies that prohibit discrimination, harassment, intimidation, and bullying, including: (a) Information about how to file a complaint, to students, parents, employees, agents of the governing board, and the general public. (b) Identified the person in the LEA responsible for implementation of the policy prohibiting discrimination, harassment, intimidation, and bullying; and the person responsible for investigating complaints, as well as ensuring compliance with the following: 5 CCR §§ 4600 and 4900; and EC §§ 200–283. The contact information (i.e., name, office address, office telephone number, and e-mail address) of the officer responsible for equity and compliance with Title IX, must also be included.

(c) This information is to be translated according to EC § 48985. Investigated all allegations of discrimination and implemented effective corrective actions whenever necessary and appropriate; maintained documentation of complaints and their resolution for a minimum of one review cycle; and ensured that complainants are protected from retaliation and the identity of a complainant remains confidential. Posted policies prohibiting discrimination, harassment, intimidation, and bullying in all schools and offices, which include staff lounges and student government meeting rooms. The LEA has provided, incident to the publicizing of policies against discrimination, harassment, intimidation and bullying described in EC § 234.1(c), to certificated school site employees who serve pupils in any of grades seven to twelve, inclusive, who are employed by the LEA, information on existing school site and community resources related to the support of lesbian, gay, bisexual, transgender, and questioning (LGBTQ) pupils, or related to the support of pupils who may face bias or bullying on the basis of religious affiliation, or perceived religious affiliation. (a) School site resources may include, but are not limited to, peer support or affinity clubs and organizations, safe spaces for LGBTQ, or other at-risk pupils, counseling services, staff who have received anti-bias or other training aimed at supporting these pupils or who serve as designated support to these pupils, health and other curriculum materials that are inclusive of, and relevant to, these pupils, online training developed pursuant to EC § 32283.5, and other policies adopted pursuant to this article, including related complaint procedures. (b) Community resources may include, but are not limited to, community-based organizations that provide support to LGBTQ, or other at-risk pupils and their families, and physical and mental health providers with experience or training in treating or supporting these pupils.

Based on a review of the documentation, the Agency has not shown compliance with publicizing the correct Title IX Compliance Officer and nondiscrimination policy and statement to parents, students and stakeholders of the Agency, nor provided resources to LGBTQ and other at risks students nor shown training provided to certificated staff who serve 7-12 grade students; nor has shown a clear process for retaining complaint files for the indicated time period, nor shown compliance with providing a final written decision, appeals process (to CDE) for complainants; nor provided a nondiscrimination policy that covers all protected group statuses and the Agency's administrative regulations are not clear as to the administrators who have been approved by the Board or Superintendent to oversee the policies and procedures for (a) students and (b) employees.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

The Agency must upload the following documents to show compliance with this section: (1) Agency Board Policies Prohibiting Discrimination, Harassment, Intimidation, and Bullying with all of the protected group statuses indicated 1.0 and 3.0; (2) Agency Board Policy on Complaint Process; (3) For formal complaints, provide a template of a Final Written Decision Letter with appeals rights - to CDE - in the body of the letter. Provide a statement that there is a centralized location for housing electronic and paper complaint files. Create a cover sheet with a checklist for complaints that indicates the final written decision has been provided to the complainant and retained by the Agency; (4) Confirmation Statement of Nondiscrimination Policy Postings with proof that the three school sites selected for the Federal Program Monitoring Review have board policies 5145.3 and 5145.7 posted in the prescribed areas. This can be accomplished by providing a copy of an email that has been sent to the three school sites. The email must include a directive that the boards policies must be posted in the prescribed areas with the correct board policies attached; (5) Correct the nondiscrimination statement to include all of the protected group statuses Title IX Compliance Officer contact information for all Title IX Compliance Officer of the Agency; (6) Place the corrected nondiscrimination statement with the Title IX Compliance Officer contact information on the Agency's website and the three school sites that were chosen for the FPM review; (7) Provide parents and students of the Agency with an update to the Agency's (a) Annual Notification, (b) Parent Handbook, (c) Student Handbooks that includes the nondiscrimination statement and Title IX Compliance Officer contact information. If an addendum is used, then proof of dissemination must be provide to clear the finding; (8) Provide parents and students of the Agency with an update to the Agency's (a) Annual Notification, (b) Parent Handbook, (c) Student Handbooks that includes the board policy and administrative regulations for 'Nondiscrimination/ Harassment' and Title IX Compliance Officer contact information. If an addendum is used, then proof of dissemination must be provide to clear the finding; and (9) Provide proof of training and dissemination of (a) community resources and (b) school site resources to certificated staff who serve grades 7 - 12 as it pertains to LGBTQ, Immigration and other at risk pupils.

2. EE 02: Governance Counseling Materials and Staff

All counseling staff and materials do not discriminate against any student based on actual or perceived ancestry, age, color, disability, gender, gender identity, gender expression, nationality, immigration status, race or ethnicity, religion, sex, sexual orientation, or association with a person or a group with one or more of these actual or perceived characteristics. The LEA develops and uses an internal procedure to ensure that different counseling materials for students are not used on the basis of sex or the use of materials does not permit or require different treatment of students based on sex. The LEA takes action to ensure that any disproportionate number of students of one sex enrolled in a particular class is not the result of counseling or appraisal materials.

Based on a review of the documentation that has been reviewed, it was found that the documentation is not germane to the section. Therefore, the Agency has not shown compliance with its course catalog, course selection process master scheduling process, nor proof of a policy or process for resolving disproportionate number of students being steered into course based on their gender or protected group status.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

The Agency must upload the following documents to show compliance with this section: (1) Agency or School Policy/Procedure which Ensures All Counseling Staff and Materials are Unbiased; (2) Course Announcements or Course Catalog which includes the nondiscrimination statement with Title IX Compliance Officer(s) contact information; (3) Guidance Counseling Materials and (4) Policy or Statement Explaining the Master Course Scheduling Process. If a statement is submitted, it must be on letterhead and signed by an administrator.

3. EE 03: Marital and Parental Status

The LEA applies no rule concerning a student's actual or potential parental, family, or marital status that treats students differently on the basis of sex. The LEA does not exclude or deny any student from any educational program or activity solely on the basis of pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom. Pregnant students and parenting male or female students are not excluded from participation in their regular school programs or required to participate in pregnant-student programs or alternative educational programs. Pregnant/parenting students who voluntarily participate in alternative programs are given educational programs, activities, and courses equal to the regular program. The LEA treats pregnancy, childbirth, false pregnancy, termination of pregnancy, and recovery therefrom in the same manner and under the same policies as any other temporary disability. The LEA provides reasonable accommodations to a lactating pupil on a school campus to express breast milk, breast-feed an infant child, or address other needs related to breast-feeding. A school shall be required to provide the reasonable accommodations specified only if there is at least one lactating pupil on the school campus.

Based on a review of the documentation that has been reviewed, the Agency has not showed compliance with having accommodations for lactating pupils in place nor that pregnant and parenting students have access to the same programs and activities as non-pregnant and parenting students.

The Agency must upload the following documents to show compliance with this section: (1) Statement from Agency about Lactating Students; (2) Student Schedules — Three Pregnant/Parenting Students and Three Regular Students in the Same Grade Level; and (3) Show how parents and students are made aware of the pregnant/ parent and lactation policy. An addendum may be used to inform parents and students of the policy but dissemination must be provided in order to clear the finding.

4. EE 04: Sex Equity

The governing board policy prohibits sexual harassment as a form of sexual discrimination and provides notification of available remedies. This policy includes information on where to obtain the specific rules and procedures for reporting charges of sexual harassment and for pursuing available remedies. The LEA notifies students, parents, employees, and others that it does not discriminate on the basis of sex. The LEA policy on sexual harassment is displayed in a prominent location in the main administrative building and other area of the campus and school site. A copy of the agency's written policy on sexual harassment is provided: (a) as it pertains to students, as part of any orientation program conducted for new students at the beginning of

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

each quarter, semester, or summer session, as applicable;

(b) to all agency staff (faculty, administrative and support) at the beginning of each quarter or semester or at the time a new employee is hired;

(c) in any publication of the institution that sets forth the comprehensive rules, regulations, procedures and standards of conduct for the institution. The LEA maintains records of complaints of sexual harassment brought by pupils and employees of the school district.

Based on a review of the documentation, the agency has not shown compliance with providing students the sexual harassment policy at the beginning of each school year; nor shown that the board policies for sexual harassment is posted in the prescribed areas; nor shown that parents have been informed of the sexual harassment policy; nor shown that parents are made aware of the appeals process - to CDE- in sexual harassment complaints; nor shown that parents, and students are made aware of the Title IX Compliance Officer in handbooks and annual notifications.

The Agency must upload the following documents to show compliance with this section: (1) Parent Handbook with the nondiscrimination statement and the correct Title IX designee. The statement must include the word "sex," "discrimination," and all the contact information for the Title IX Compliance Officer; (2) Student Handbook with the nondiscrimination statement and the correct Title IX designee. The statement must include the word "sex," "discrimination," and all the contact information for the Title IX Compliance Officer; (3) Annual notification with the nondiscrimination statement and the correct Title IX designee. The statement must include the word "sex," "discrimination," and all the contact information for the Title IX Compliance Officer; (4) Provide a copy of the Title IX Web page with the contact information - including email addresses- for all administrators who have been designated as the 'Title IX Compliance Officer' for the Agency.

5. EE 05: Athletic Funding

Athletic programs supported by public funds provide equal opportunity for participation by all students and ensure equitable use of such funds. If the LEA reduces its athletic budget, it does so consistent with state and federal gender equity laws. Prior to January 1, 2019, a school using uniforms that bear the term Redskins may purchase or acquire a number of uniforms equal to up to 20 percent of the total number of uniforms used by a team or band at that school during the 2016–17 school year for the purposes of replacing damaged or lost uniforms.

No documentation was uploaded to this item, therefore the Agency has not shown compliance with this section.

The Agency must upload the following documents to show compliance with this section: (1) Sex segregated expenditures from the three school sites selected for review showing how public funds were spent on the athletic teams for the 2017 - 18. The expenditures must be listed out and explained. If certain items were covered by a booster funds then the Agency must indicate that in the documentation. The Agency must also detail how it tracks the expenditures covered

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

by the Boosters and ensures that expenditures are equitable; (2) Coaches stipends and/ or salaries for the three school sites selected under the FPM Review; and (3) Provide a statement on letterhead, and signed by an administrator, that it has or has not purchased uniforms for athletics teams, band or other spirit gear reflecting the name "Redskins". If such expenditures have occurred, please upload a detail accounting of the expenditures.

6. EE 06: Opportunity and Equal Educational Access

The LEA programs, activities, and student clubs are available to all persons without regard to actual or perceived ancestry, age, color, disability, gender, gender identity, gender expression, nationality, immigration status, race, ethnicity, religion, sex, sexual orientation, or association with a person or a group with one or more of these actual or perceived characteristics.

The governing board of the school district monitors compliance with any and all applicable nondiscrimination rules and regulations. All student clubs have equal access to facilities and a fair opportunity to meet. No course or activity is labeled or scheduled in a way which results in the separation of students on the basis of sex, sexual orientation, gender identity, race, ancestry, national origin, religion, color, and mental or physical disability. Sex-segregated programs, activities, and facilities, including the participation on all sex-segregated athletic teams and in all sex-segregated competitions, shall be available to all pupils on the basis of their individual gender identity, irrespective of the gender listed on a pupil's records.

All public schools are prohibited from using the term Redskins for school or athletic team names, mascots, or nicknames. A public school may continue to use uniforms or other materials bearing the term Redskins as a school or athletic team name, mascot, or nickname that were purchased before January 1, 2017, if all of the following requirements are met: (a) The school selects a new school or athletic team name, mascot, or nickname; (b) The school refrains from purchasing or acquiring, for the purpose of distribution or sale to pupils or school employees, any uniform that includes or bears the term Redskins; (c) The school refrains from purchasing or acquiring, for the purpose of distribution or sale to pupils or school employees, any yearbook, newspaper, program, or other similar material that includes or bears the prohibited school or athletic team name, mascot, or nickname in its logo or cover title; (d) The school refrains from purchasing or constructing a marquee, sign, or other new or replacement fixture that includes or bears the prohibited school or athletic team name, mascot, or nickname.

Based on a review of the documents that have been uploaded, the Agency submitted board policies but needs additional supporting documentation to show proof of compliance with this section.

The Agency must upload the following documents to show compliance with this section: (1) Agency or School Policy for Adding New Classes of Instruction; (2) Extracurricular/co-curricular board policy and administrative regulation; (3) Athletic Competition administrative regulation; (4) Agency Policy or Process on Monitoring Compliance with Civil Rights Rules and Regulations; (5) Agency Policy/Procedure for Selecting New Team Name, Mascot; (6) Legible and viewable Athletics Web Page Screen Shot Reflecting Athletics Team Name(s) / Band Name(s); (7) Course Announcements or Course Catalog with nondiscrimination statement and Title IX Compliance Officer contact information; (8) Policy/Process Related to Gender Identity, pertaining to transgender and gender nonconforming students of the Agency; (9) Athletics

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

uniforms name(s), legible and viewable screenshot(s)/ picture(s) of athletics uniforms, band uniforms name(s), and legible and viewable screenshot(s)/ picture(s) of band uniforms; and (10) Student Programs, Activities and Clubs Materials which are brochures, flyers, posters, newsletters, bylaws, handbooks and other outreach materials that show all programs/activities/clubs are available and accessible to all students.

7. EE 07: Access to Athletics and Facilities

The LEA accommodates the interests and abilities in athletics of both sexes by any one of the following means: (a) Opportunities for interscholastic-level participation for male and female students are substantially proportionate to their respective enrollments. (b) The history of the program and continuing practice of expansion are responsive to the developing interest and abilities of members of the sex that has been and is underrepresented among interscholastic athletes. (c) Interests and abilities of the underrepresented sex have been fully and effectively accommodated by the present program. The LEA ensures that each public elementary, secondary school, and charter school offering competitive athletics shall make all of the following information publicly available at the end of the school year and shall reflect the total number of players on a team roster on the first official day of team competition: total enrollment of the school, classified by gender; number of pupils enrolled at the school who participate in competitive athletics, classified by gender; number of boys' and girls' teams, classified by sport and competition level. (a) This information shall be posted on the Internet and be listed by individual school. (b) All data utilized to compile each school's information shall be retained by the school for a minimum of three years after the information is posted on the Internet. Facilities and equipment provided for students are comparable and equitable to both sexes without disparity or imbalance, consistent with his or her gender identity, irrespective of the gender listed on the pupil's records.

Based on a review of the documentation, it was found that documentation was either missing the required information or not legible and viewable for evaluation. Therefore, the Agency has not shown proof of compliance with this section.

The Agency must upload the following documents to show compliance with this section: (1) Agency Athletic Web Page for the three school sites selected for review. The page must have the correct nondiscrimination statement with Title IX Compliance Officer designations. The page must also include athletic data -for three school years- pursuant to Ed. Code 221.9; (2) Site Maps for the three selected school site with square footage, locker counts, toilet counts, shower counts. any disparities must have a statement of explanation, on letterhead and signed by an administrator; (3) Athletics Recruitment and Participation Materials; (4) Athletics Rosters and Competition Schedules for the three schools sites that have been selected for the review; and (5) Agency or School Policy Related to Competitive Athletics.

8. EE 08: Immigration and Citizenship Status

School officials and employees of an LEA shall not collect information or documents regarding citizenship or immigration status of pupils and their family members. The Agency shall report to the responsible governing board in a timely manner any requests for information or access to a school site by an officer or employee of a law enforcement agency for the purpose of enforcing the immigration laws in a manner that ensures confidentiality and privacy of any potentially

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

identifying information. If an employee of a school is aware that a pupil's parent or guardian is not available to care for the pupil, the school shall first exhaust any parental instruction relating to the pupil's care in the emergency contact information it has for the pupil to arrange for the pupil's care. A school is encouraged to work with parents or guardians to update the emergency contact information and not to contact Child Protective Services to arrange for the pupil's care unless the school is unable to arrange for care through the use of emergency contact information or other information or instructions provided by the parent or guardian. The Agency's governing board shall do both of the following: (a) Provide information to parents and guardians, as appropriate, regarding their children's right to a free public education, regardless of immigration status or religious beliefs. This information shall include information relating to "know your rights" immigration enforcement established by the Attorney General and may be provided in the annual notification to parents and guardians pursuant to § 48980 or any other cost-effective means determined by the LEA. (b) Educate pupils about the negative impact of bullying other pupils based on their actual or perceived immigration status or their religious beliefs and customs. All LEAs shall adopt policies based on the Promoting a Safe and Secure Learning Environment for All model developed by the state Attorney General.

No documentation was uploaded for this item therefore, the Agency has not shown compliance with this section.

The LEA must upload the following: (1) Adopted board policies that contain the language outlined under the "Promoting a Safe and Secure Learning Environment for All", for (a) Agency or School Policy Related to Hate Motivated Behavior, (b) Agency Policy Regarding Information Sharing, (c) Agency Policy Regarding Monitoring and Receiving Visitors onto Campus, (d) Agency Policy Regarding Parental Notification of Immigration Enforcement, (e) Agency Policy Regarding Responding to On-Campus Immigration Enforcement, (f) Agency Policy Regarding Response to the Detention or Deportation of a Student's Family Member, (g) Agency Policy Related to Collecting and Retaining Students Information, (h) Annual Notification Policies, (i) Agency Policy Related to Inquiries Regarding Immigration Status, Citizenship Status Information, and (j) Agency Policy Related to Inquiries about Social Security Numbers and Cards; and, (2) Distribute the "Know Your Rights" information (in the appendix "Promoting a Safe and Secure Learning Environment for All" guide). Proof of dissemination must be provided in order to clear this finding.

English Learner

1. EL 01: English Learner Advisory Committee (ELAC)

A school site with 21 or more English Learners (ELs) must have a functioning ELAC that meets the following requirements:

(a) Parent members are elected by parents or guardians of ELs.

(b) Parents of ELs constitute at least the same percentage of the committee membership as their children represent of the student body.

(c) The ELAC shall be responsible for assisting in the development of the schoolwide needs assessment and ways to make parents aware of the importance of regular school attendance.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

(d) The ELAC shall advise the principal and staff in the development of a site plan for ELs and submitting the plan to the school site council for consideration of inclusion in the Single Plan for Student Achievement (SPSA).

(e) The ELAC receives training materials and training, planned in full consultation with committee members, to assist members in carrying out their legal responsibilities.

Each ELAC has the opportunity to elect at least one member to the District English Learner Advisory Committee (DELAC) or participants in a proportionate regional representation scheme when there are 31 or more ELACs in the district.

The review of ELAC documentation and interviews with parent members reveal that the function of ELAC at Comstock and Allen does not fulfill the minimum legal requirements.

Allen and Comstock may submit a plan of action that must include evidence of building capacity so that the ELAC may provide assistance in the development of the school-wide needs assessment and advisory to the principal and staff on the development of a site plan for ELs, and that the site plan for ELs is submitted to the school site council for consideration of inclusion in the Single Plan for Student Achievement (SPSA). Finally, the plan must demonstrate that the ELAC will receive training materials and training, planned in full consultation with committee members, to assist members in carrying out their legal responsibilities. Each site must also include evidence of initial implementation of their plan by conducting their first meeting and submitting the agenda, sign-in sheet, minutes, and ELAC roster delineating members by role (i.e. EL parent, EO parent, staff, etc.).

2. EL 03: Identification and Assessment

Within 30 calendar days of initial enrollment, each student whose home language is other than English, as determined by the HLS, must be assessed for English proficiency by means of the current English language proficiency assessment, and, each LEA must annually assess the English language proficiency and academic progress of each EL. All currently enrolled ELs must be assessed for English language proficiency by administering the current English Language Proficiency Assessments for California (ELPAC) during the annual assessment window, and each EL on an active individualized education plan (IEP) or Section 504 Plan must be annually assessed for English language proficiency using the accommodations, modifications, or alternate assessments for the current ELPAC as specified in the student's IEP or Section 504 Plan. Finally, Each LEA must identify all immigrant children and youth (ages 3 through 21), who were not born in any state and have not attended school in any state for more than three full academic years.

The review of home language surveys (HLS), EL assessment data, IEPs, cumulative records of ELs, RFEPs, and ELs on an active IEP, as well as Administrative Regulations and the EL Master Plan reveal that the LEA has 339 ELs without current ELPAC results, and there is no evidence that ELs have taken the SBAC. In addition, there is inconsistent documentation of accommodations and modifications in the IEPs, and there is no evidence that an alternate assessment is administered in lieu of the ELPAC for ELs on an active IEP of whom several have been reclassified without criteria. Finally, the LEA did not submit policies and procedures to identify immigrant students.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

The LEA must submit evidence of an approved waiver for missing SBAC results due to fires in the local area. The LEA must also submit a revised query to identify students with missing ELPAC scores with reasons for the missing results noted, and a plan of action, moving forward, on how the district will remedy missing ELPAC scores on a more immediate basis. In addition, the LEA must submit policies and procedures to identify immigrant students as well as policies and procedures for the appropriate documentation of the required EL components in the IEP that includes accommodations, modifications, or alternate assessment. The evidence must involve training on the LEA's policies and procedures provided to all Santa Rosa High School District staff responsible for the IEP process - including reclassification of ELs on an active IEP.

3. EL 04: Implementation, Monitoring & Revision of Title III Plan

Each LEA and consortia must annually update, implement, and monitor a Title III plan for the use of funds in a subgrant year.

The LEA receiving Title III funds must use these funds to:

(a) Increase the English language proficiency of ELs by providing effective language instruction educational programs that meet the needs of ELs and demonstrate success in increasing:

I. English language proficiency; and

II. Student academic achievement

(b) Provide effective professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instruction educational programs), principals and other school leaders, administrators, and other school or community-based organizational personnel, that is:

I. Designed to improve the instruction and assessment of ELs;

II. Designed to enhance the ability of such teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs;

III. Effective in increasing children's English language proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers; and

IV. Of sufficient intensity and duration (which shall not include activities such as one-day or short-term workshops and conferences) to have a positive and lasting impact on the teachers' performance in the classroom, except that this subparagraph shall not apply to an activity that is one component of a long-term, comprehensive professional development plan established by a teacher and the teacher's supervisor based on an assessment of the needs of the teacher, the supervisor, the students of the teacher, and any LEA employing the teacher, as appropriate.

(c) Provide and implement other effective activities and strategies that enhance or supplement language instruction educational programs for ELs, which:

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

- I. Shall include parent, family, and community engagement activities; and
- II. May include strategies that serve to coordinate and align related programs.

Authorized sub grantee activities may use funds by undertaking one or more of the activities described in the legal statute.

The LEA did not submit sufficient documentation to demonstrate having met the minimum requirements described in the legal statutes.

The LEA must submit the Title III transition plan or federal programs addendum that describes both the required and supplemental components for LEAs receiving Title III funds for the 2017-18 and 2018-19 fiscal years.

4. EL 05: Program Inclusion in Development of the SPSA (Schoolwide)

The EL program must be included in the development of the SPSA. An approved SPSA must contain:

- (a) An analysis of academic performance and language development data to determine EL student and program needs.
- (b) School goals to meet the identified academic and language proficiency needs of ELs.
- (c) Activities to reach school goals to improve the academic performance of EL students.
- (d) The means to annually evaluating the progress of programs toward accomplishing the goals, including determining whether the needs of all children have been met by the strategies used, particularly the needs of low-achieving ELs and those at risk of not meeting state academic content standards. The SPSA must be consistent with the district local plan.

A review of the SPSA for Comstock reveals that it does not specifically address the components described in a-d of the legal statute, and Allen did not submit sufficient documentation to demonstrate meeting the legal minimum legal requirements described in the legal statutes. In addition, the LEA did not submit a Title III plan to confirm SPSA consistency.

The LEA must submit local policies and procedures to include the EL program in the development of the SPSA. In addition, the LEA must submit evidence of training on the policies and procedures provided to all Santa Rosa High School District stakeholders responsible for the development of the SPSA, including site administrators, ELAC, and school site council members. Finally, the LEA must submit Board approved 2018-19 SPSAs for Comstock and Allen that include the required components of the EL program as described in a-d of the legal statute.

5. EL 06: Title III and EIA-LEP Inventory

For all categorical programs, each LEA must maintain an inventory record for each piece of equipment with an acquisition cost of more than \$500 per unit that is purchased with EIA-LEP

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

and Title III funds. The record must describe the acquisition by:

- (a) Type
- (b) Model
- (c) Serial number
- (d) Funding source
- (e) Acquisition date
- (f) Cost
- (g) Location
- (h) Current condition
- (i) Transfer, replacement, or disposition of obsolete or unusable equipment

In addition, each LEA must have conducted a physical check of the inventory of equipment within the past two years and reconciled the results with inventory records.

A review of LEA inventory revealed that the LEA limited its query to Comstock and Allen and did not provide sufficient evidence of districtwide Title III inventory.

The LEA must submit a districtwide historical inventory list of all equipment purchased for \$500 or more and a record of last physical check of items. If no purchases were made, the LEA may indicate such in a comment with the query showing zero expenditures on equipment for Title III (4203).

6. EL 07: Supplement, Not Supplant with Title III & EIA-LEP

General fund resources must be used to provide services and programs for ELs, including English language development (ELD) and access to the core curriculum. The provision of such services and programs must not be contingent on the receipt of state or federal supplementary funds. Each LEA must use Title III funds only to supplement, not supplant federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for ELs and immigrant children and youth and in no case to supplant such federal, state, and local public funds.

The review of fiscal expense reports for 2017-18 and 2018-19 revealed some expenditures that are not authorized under Title III as well as others for which further evidence is required.

For 2017-18. The LEA must reverse salaries and benefits for the following positions listed in the 2017-18 detailed general ledger:

- 1. Clerical & Office = \$15,604.90 (plus benefits)

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

2. Cert. Pupil Supp (SOLL) = \$173,045.63 (plus benefits)
3. Current Retiree, Guidance (SOLL) = \$2,77.95 (plus benefits)
4. Family Engagement (FEF) = \$35,516.17 (plus benefits)
5. Cert Other, School Adm = \$2,067.26 (plus benefits)

Reversals must be from an unrestricted funding source with supporting documentation to substantiate the reversals.

In addition, for 2017-18, the LEA must submit supporting evidence to justify the following expenditures:

1. Books Other = \$19,381.56
2. Travel conference = \$4,054.01
3. Online Comp = \$20,698.55
4. Field Trip = \$3,678.07
5. Other Svs & Op, Staff = \$3,650.00
6. Classified Supe = \$140.63
7. Class Ex Duty = \$136.64
8. Materials & Sup, Parent = \$828.45

For 2018-19, the LEA must reverse salaries and benefits for the following positions listed in the 2018-19 detailed general ledger:

1. Clerical & Office = \$4,654.39 (plus benefits)

Reversals must be from an unrestricted funding source with supporting documentation to substantiate the reversals.

In addition, the LEA must reverse funds for the following unauthorized expenditures:

1. Telephones (SOLL) = \$294.86
2. Food = \$40.00
3. Power Adapters = \$26.70
4. ELPAC Workshop = \$235.00

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

Reversals must be from an unrestricted funding source with supporting documentation to substantiate the reversals.

Finally, for 2018-19, the LEA must submit supporting evidence to justify the following expenditures:

1. Instr Aides Sub (plus benefits)= \$1,600
2. Books Other Than Inst = \$47.26
3. Online-Comp = \$19,000
4. Other Svs & Staff Dev = \$1,825
5. Cert Ex Duty = 43.98
6. Other Services = \$200.00
7. Travel conf Post Trip = \$17.50
8. Travel Conference = \$260.00

7. EL 08: Time Accounting Requirements (Title I and Title III)

Each LEA must properly assess charges for direct or indirect costs of Title III EL and immigrant funds for salaries and wages in proportion to the allowable and identified quantity and duties of the employee. In addition, each employee paid in part from Title III and in part from a second funding source, or an employee paid from multiple cost objectives, must complete a Personnel Activity Report (PAR) each pay period, or an approved sampling method must be used, while employees funded solely under Title III must complete a semiannual certification of such employment.

The review of job descriptions, time accounting, budget reports, letters to supervisors, and interviews revealed that the LEA does not have written processes and procedures and Title III funded positions do not carry-out authorized activities.

The LEA must reverse the Title III portion of salaries and benefits for all positions listed in the 2017-18 and 2018-2019 budget reports of employees paid in whole or in part with Title III funds:

2017-18 = \$42,843.50, plus benefits, for Bigelow, Morrison, Ocampo, Ferrey, Pena, Chanth, and Delgado Carol.

2018-19 = \$112,359.54, plus benefits, for Stashak and Morrison

Reversals must be from an unrestricted funding source with supporting documentation to substantiate the reversals.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

The LEA must also submit written policies and procedures that include forms to be used, training, reconciliation of payroll with time reported on time certifications, reporting periods, where and when to send the forms, and any additional procedures that the LEA determines significant to the process of time accounting for Title III funded employees. In addition, the LEA must include evidence of training on the policies and procedures provided to all Santa Rosa High School District staff, supervisors, and Title III funded employees responsible for maintaining time accounting records.

8. EL 09: Evaluation of EL Program Effectiveness

A program evaluation must be provided by each LEA and must be used to determine:

(a) The degree to which, within a reasonable amount of time:

I. ELs are attaining English language proficiency comparable to that of average native speakers of English in the district.

II. EL students' academic results indicate that ELs are achieving and sustaining parity of academic achievement with students who entered the district's school system already proficient in English. (20 U.S.C. §§ 1703[f], 6841[b],[c]; Castaneda v. Pickard [5th Cir. 1981] 648 F.2d 989,1009–1011)

III. The effectiveness of programs and activities in assisting ELs to attain proficiency and to meet academic achievement and content standards.

(b) Necessary improvements to programs and activities for which Title III funds have been used for EL and immigrant students.

(c) Whether to eliminate specific EL activities proven to be ineffective.

The review of the LEA program evaluation revealed that the LEA did not evaluate their EL program based on the required criteria outlined in a-c of the legal statute.

The LEA must submit a program evaluation that addresses the required components outlined in a-c of the legal statute.

9. EL 10: Reclassification

Each LEA must reclassify a student from EL to proficient in English by using a process and criteria that includes, but is not limited to:

(a) Assessment of English language proficiency.

(b) Teacher evaluation that includes, but is not limited to, the student's academic performance.

(c) Opportunities for parent opinion, consultation, and involvement during the reclassification process.

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

(d) Comparison of student's performance in basic skills against an empirically established range of performance in basic skills based upon the performance of English proficient students of the same age that demonstrate whether the student is sufficiently proficient in English to participate effectively in a curriculum designed for students of the same age whose native language is English.

Each LEA must also maintain the following in the student's permanent record (regardless of the physical form of such record and to ensure transfer of documentation):

(a) Language and academic performance assessments

(b) Participants in the reclassification process

(c) Decision regarding reclassification

The review of RFEP and progress monitoring forms as well as cumulative records of ELs, RFEPs and ELs on an active IEP revealed that RFEP forms and language performance assessment results are not consistently kept in the students files at Allen. In addition, RFEP criteria may be over-ridden by a teacher or by the IEP team for either ELs or ELs on an active IEP, respectively, with no indication of established criteria for ELs on an active IEP. For ELs on an active IEP, an alternate assessment is not administered in lieu of the state assessment and EL IEPs are marked "No" for EL status, as opposed to RFEP.

The LEA must submit board approved LEA reclassification criteria that align with state guidelines for ELs and ELs on an active IEP. The LEA must also submit approved local board policy or administrative regulations that describe the reclassification process for all ELs and ELs on an active IEP. In addition, the LEA must submit policies and procedures for maintaining the required documentation in student records, which includes evidence of training on the policies and procedures provided to all Santa Rosa High School District staff responsible the reclassification process.

10. EL 11: Teacher EL Authorization

Teachers assigned to provide ELD and instruction in subject matter courses for ELs must be appropriately authorized.

The LEA did not submit sufficient evidence to demonstrate having met the minimum requirements described in the legal statutes.

The LEA must submit one sortable excel spreadsheet with all currently employed certificated teachers in the district and only one EL-authorization code held by each teacher. In addition, the LEA must submit the TCC of those who possess one (signed, dated, with SSN - etc. redacted).

11. EL 12: Professional Development Specific to English Learners

Each LEA must provide sufficient professional development specific to the effective

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

implementation of programs for ELs.

Professional development is provided to classroom teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel, that is:

(a) Designed to improve the instruction and assessment of ELs.

(b) Designed to enhance the ability of teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs.

(c) Effective in increasing the student's English language proficiency or substantially increasing the teacher's subject matter knowledge, teaching knowledge, and teaching skills as demonstrated through classroom observation.

(d) Of sufficient intensity and duration (which shall not include activities such as one-day or short-term workshops and conferences) to have a positive and lasting impact on the teacher's performance in the classroom.

The LEA did not provide sufficient evidence to demonstrate meeting the minimum requirements described in the legal requirements.

The LEA must submit evidence of EL-specific PD that is unrelated to state requirements (i.e. ELAC, ELPAC, publisher PD, etc.) and is provided to teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel within the Santa Rosa High School District. The evidence must include District and site level calendars, agendas, descriptions, materials, and sign-in sheets for PD of sufficient intensity and duration to impact EL achievement. In addition, the LEA must submit policies and procedures or sample observation protocols to demonstrate the implementation of EL specific PD relevant to grade-level core academic subjects, including ELD.

12. EL 13: Language Program Options and Parent Choice

School districts and county offices of education must, at a minimum, provide ELs with a structured English immersion (SEI) program. SEI programs provide nearly all classroom instruction in English, but with curriculum and a presentation designed for students who are learning English.

A review of EL data revealed that all ELs are currently placed in SEI; however, Master Schedules and classroom observations reveal that, as a program of language acquisition, SEI does not exist for all ELs at each site under review.

The LEA must resubmit data to identify ELs who are not currently enrolled in a program of language acquisition to establish EL student needs. The LEA must submit evidence of immediate action in the implementation of a language acquisition program to ensure that all ELs at Santa Rosa High School District receive both designated and integrated language instruction.

13. EL 14: ELD

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

As part of the core program provided through general funds, all identified ELs must receive a program of ELD instruction, in order to develop proficiency in English as rapidly and effectively as possible and meet state priorities for ELs. Each LEA must take appropriate action to overcome language barriers that impede equal participation by its students in its instructional programs. Title III funds are used to supplement the core ELD program.

A review of the EL Master Plan, Master Schedules, EL student counts, and on site observations revealed that there is inconsistency in the providing of designated ELD for ELs identified by the LEA as newcomers, at each school site, and designated ELD does not exist for all ELs. In addition, materials are not grade-level aligned nor based on the Common Core State Standards for ELD.

The LEA must submit evidence of immediate action in the implementation of a language acquisition program to ensure that all ELs at Santa Rosa High School District receive designated language instruction, districtwide. The evidence must include course descriptions specific to designated language instruction with grouping-placement, course exit criteria, and a list of core and support instructional materials for all grades and/or ELP levels. In addition, the LEA must submit evidence of PD specific to designated language instruction provided to teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel within the Santa Rosa High School District.

14. EL 15: Access to Core Subject Matter

Academic instruction for ELs must be designed and implemented to ensure that ELs meet the district's content and performance standards for their respective grade levels within a reasonable amount of time. Each LEA must have a means to assist ELs to achieve at high levels in the core academic subjects to ensure that they meet the same challenging state content standards and achievement goals all children are expected to meet. In addition, each LEA must monitor student academic progress and provide additional and appropriate educational services to ELs in kindergarten through grade twelve for the purposes of overcoming language barriers in each subject matter.

A review of EL data revealed the identification of LTEL students failing one or more courses but did not include evidence of providing additional and appropriate educational services. The LEA also did not submit procedural guidelines and criteria for the placement of ELs in core classes and interventions nor descriptions of how instructional strategies and materials in core content areas are differentiated for ELs at different grade levels. In addition, the onsite classroom observations and review of newcomer course schedules revealed that integrated language instruction was not present and newcomer students are not provided with grade-level core content instruction and, therefore, ELs do not meet the district's content and performance standards for their respective grade levels.

The LEA must submit evidence of immediate action in the implementation of an integrated language acquisition program to ensure that all ELs at Santa Rosa High School District receive integrated language instruction, districtwide. The LEA must submit the LEA's procedural guidelines and criteria for placement of ELs in core classes and interventions as well as the LEA's descriptions of how instructional strategies and materials in core content areas are differentiated for English learners at different grade levels. For LTELs failing one or more

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Federal Program Monitoring 2018-19

Notification of Findings

Santa Rosa High (49709200000000)

courses, the LEA must submit evidence of interventions and/or support services (3 samples with student names redacted). In addition, the LEA must submit the exit criteria and catch-up plans for students not enrolled in grade-level core courses. Finally, the LEA must submit evidence of PD specific to integrated language instruction provided to teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel within the Santa Rosa High School District.

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