



The Office of Internal Performance Audit

Internal Audit Report

Multilingual Learner / English Language Development - Compliance Audit

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Letter of Transmittal

February 4, 2026

Portland Public Schools - Audit Committee
501 North Dixon Street
Portland, OR 97227

The Office of Internal Performance Audit (OIPA) has completed the Multilingual Learner (ML) / English Language Development (ELD) - Compliance Audit. The audit was included in the Audit Plan approved by the Portland Public Schools (PPS) Board of Education on January 11, 2022, resolution number 6428.

The objective of the audit was to determine if the school district has adequate internal controls to ensure compliance with PPS policy, administrative directives, state, and federal requirements stating in part, public schools must take affirmative steps to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. Key compliance categories include:

- Identification and assessment of ML students.
- Required communications with the student's family.
- Title III ELD Family Informational Sessions.
- Annual ELPA (English Language Proficiency Assessment) Summative, Exiting the ELD Program, and Post-Exit Monitoring.

To achieve the audit objective, we selected a total of 190 students for testing. For each of the students tested, we obtained evidence to determine whether the school district met each of the requirements for the key compliance categories identified above.

Based on the results of the audit, we found internal controls need to be strengthened to maintain the overall integrity of the school district's compliance with applicable requirements to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. The audit did not identify any evidence of intentional fraud, or a lack of care. However, the audit did identify instances of noncompliance in each of the key categories we tested, as well as some opportunities for process improvement. The corresponding audit results and recommendations are included in this audit report.

Beginning the 2025-2026 school year, there was some restructuring of staff responsibilities within the Funded Programs and the Multilingual Services teams. Staff performing the functions discussed in this audit were previously considered part of the Funded Programs team, and are now part of the Multilingual Services team. As a result, when referring to the testing performed as part of this audit, there are references to the Funded Programs team; however, the recommendations are made to the Multilingual Services team that will need to implement the recommendations in this report to ensure compliance.

Additionally, PPS is discontinuing the use of the term English Language Learners, commonly referred to as ELLs, to refer to students who are eligible to receive support to ensure the student with limited English proficiency can meaningfully participate in their educational programs and services. Instead, PPS now recognizes students for whom English is not their first or home



language from an asset-based perspective; therefore, we refer to these students as Multilingual Learners (MLs).

We extend our appreciation to the staff within Funded Programs and Multilingual Services teams for their assistance and cooperation during the course of the audit.

We look forward to meeting with you at an upcoming Audit Committee meeting to discuss the report's results and recommendations. Thank you for your ongoing support of the Office of Internal Performance Audit.

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About the Office of Internal Performance Audit

Purpose and Mission

State and local governments can enhance credibility with the taxpayers by implementing performance audits to support accountability and ensure that tax dollars are spent as effectively as possible.

Portland Public Schools (PPS) performance auditing, conducted by the Office of Internal Performance Audit (OIPA), is an objective and systematic examination of evidence to provide an independent assessment of a government organization, program, activity, or function. The goal of these audits is to improve program effectiveness; improve the equity of service delivery; provide useful, objective, and timely information; strengthen administrative and management systems and controls; facilitate decision-making by parties with responsibility for overseeing or initiating corrective action; and improve student achievement District-wide. The objectives of performance audits vary, but generally address whether PPS is operating economically and efficiently, and/or whether it is achieving desired results.

The purpose of the internal performance audit function is to help improve the accountability and performance of PPS through independent auditing and reporting.

Independence and Objectivity

The OIPA Senior Internal Performance Auditor is hired, evaluated, and may only be removed by the PPS Board of Education. Reporting directly to the PPS Board of Education is meant to ensure the work of the OIPA is independent, impartial, and objective so stakeholders can trust the audit results and recommendations.

Standards

The OIPA adheres to very rigorous and demanding professional auditing requirements described in Generally Accepted Government Auditing Standards, or more commonly referred to as GAGAS or the Yellow Book.

Authority and Responsibilities

The authority and responsibilities of the OIPA are defined in its charter and PPS Board Policy 1.60.040-P, both approved by the PPS Board of Education.

Executive Summary

Portland Public Schools (PPS) policy and administrative directives, as well as state and federal laws, require school districts to take affirmative steps to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. In PPS, students for whom English is not their first or home language are recognized from an asset-based perspective; therefore, PPS refers to these students as Multilingual Learners (MLs). Ensuring MLs receive appropriate support to improve English proficiency can result in better academic outcomes, engagement in their communities, and supports the PPS Board of Education's goal related to third grade reading.

The Multilingual Learner (ML) / English Language Development (ELD) - Compliance Audit was included in the Audit Plan approved by the PPS Board of Education on January 11, 2022, resolution number 6428.

The objective of the audit was to determine if the school district has adequate internal controls to ensure compliance with applicable requirements stating in part, public schools must take affirmative steps to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. Key compliance categories include:

- Identification and assessment of MLs students.
- Required communications with the student's family¹.
- Title III ELD Family Informational Sessions.
- Annual ELPA (English Language Proficiency Assessment) Summative, Exiting the ELD Program, and Post-Exit Monitoring.

To meet the audit objective, we tested a total of 190 students to determine compliance related to each of the key categories identified above.

Based on the results of the audit, we found internal controls need to be strengthened to maintain the overall integrity of the school district's compliance with applicable requirements to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. The audit did not identify any evidence of intentional fraud, or a lack of care. However, the audit did identify instances of noncompliance in each of the key compliance categories we tested, as well as some opportunities for process improvement. The corresponding audit results and recommendations are included in this audit report.

The audit made nine recommendations and management has agreed with all nine.

Recommendations:

1. We recommend that the Multilingual Services team strengthen its internal controls to ensure timely identification and assessment of students who may be eligible for ELD Program placement.
2. We recommend the school district enhance its training for schools administration teams to improve accountability that will support the Multilingual Services team in their efforts to ensure the timely identification and assessment of students who may be eligible for ELD Program placement.

¹ The term family is used to identify the student's parent, guardian, or person in a parental relationship with the student.



3. We recommend the Multilingual Services team collaborate with the Chief of Schools to develop and implement an accountability protocol that will support the Multilingual Services team in their efforts to ensure the timely identification and assessment of students who may be eligible for ELD Program placement.
4. We recommend the Multilingual Services team strengthen internal controls designed to ensure the timely communication of the student's eligibility for ELD Program placement.
5. We recommend the Multilingual Services team consult with the Office of Technology to develop and utilize automated prompts in the Ellevation Tool to identify an error when a field used to auto-generate the notification letter is blank, instead of generating the letter without the inclusion of the required contents in the letter.
6. We recommend the Multilingual Services team strengthen internal controls to ensure all schools serving ML students hold the required Title III ELD Family Informational Sessions.
7. We recommend the Multilingual Services team collaborate with the Chief of Schools to develop and implement an accountability protocol that will support the Multilingual Services team in their efforts to ensure all schools serving ML students hold the Title III ELD Family Informational Sessions.
8. We recommend the Multilingual Services team strengthen internal controls designed to ensure compliance with the annual ELPA Summative and post-exit monitoring requirements.
9. We recommend the Multilingual Services team collaborate with the Chief of Schools to develop and implement an accountability protocol that will support the Multilingual Services team in their efforts to ensure the ELPA Summative is administered annually to all ELD Program eligible students and the ELD Monitored Student Review Form is completed.

Background Information

PPS policy and administrative directives, as well as state and federal laws, require the school district to take affirmative steps to ensure students with limited English proficiency can meaningfully participate in their educational programs and services.

PPS is discontinuing the use of the term English Language Learners, commonly referred to as ELLs, to refer to students who are eligible to receive support to ensure the student with limited English proficiency can meaningfully participate in their educational programs and services. Instead, PPS now recognizes students for whom English is not their first or home language from an asset-based perspective; therefore, we refer to these students as Multilingual Learners (MLs).

Ensuring MLs receive appropriate support to improve English proficiency can result in better academic outcomes, engagement in their communities, and supports the PPS Board of Education's goal related to third grade reading. See details of the Board's third grade reading goal in Appendix B.

Prior Audit History

In October of 2010, PPS's District Performance Auditor issued the [English Language Learners Performance Audit](#). We reviewed this audit report as part of our planning procedures for the audit. We noted no other audits related to English language development.

Roles and Responsibilities

PPS Management has the primary responsibility to establish, implement, and monitor internal controls. The Office of Internal Performance Audit's function is to assess and test those controls in order to provide reasonable assurance that the controls are adequate and operating effectively.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (aka GAGAS), except that we have not had an external peer review. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Audit Objective

The objective of the audit was to determine if the school district has adequate internal controls to ensure compliance with PPS policy and administrative directives, as well as state and federal requirements stating in part, public schools must take affirmative steps to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. Key compliance categories include:

- Identification and assessment of Multilingual Learner (ML) students.
- Required communications with the student's family.
- Title III ELD Family Informational Sessions.
- Annual ELPA (English Language Proficiency Assessment) Summative, Exiting the ELD Program, and Post-Exit Monitoring.



Below is a list of procedures performed for each of the key compliance categories:

Procedure 1: Identification and Assessment of ML Students

- Determine if the school district is identifying newly enrolled students who need to be screened for ELD Program placement eligibility.
- Determine if identified students were assessed for the ELD Program placement timely.
- Assess the adequacy of internal controls designed to ensure the identification and assessment of students who may be eligible for ELD Program placement.

Procedure 2: Required Communications with Student Families

- Determine if communications with families contained all required information, were timely, and if applicable, were translated in the language selected by the families for communication.
- Assess the adequacy of internal controls designed to ensure compliance with communications with families' requirements.

Procedure 3: Title III ELD Family Informational Sessions

- Determine if all PPS schools who serve ML students provided evidence of the completion of the required Title III ELD Family Informational Sessions.
- Assess the adequacy of internal controls designed to ensure the Title III ELD Family Informational Sessions are held.

Procedure 4: Annual ELPA (English Language Proficiency Assessment) Summative, Exiting the ELD Program, and Post-Exit Monitoring

- Determine whether all ML students, including students who were opted out of the ELD Program, complete the required annual ELPA Summative.
- Determine if the students with "Proficient" test results were exited from the ELD Program and were monitored for four years.
- Assess the adequacy of internal controls designed to ensure compliance with the annual ELPA Summative, exiting the ELD Program, and post-exit monitoring requirements.

Scope of the Audit

The scope of the audit included the 2022-2024 school years ELD Program.

Audit Approach and Methodology

To achieve the audit objective, we performed the following procedures:

- Reviewed applicable policies, procedures, administrative directives, and best practices.
- Reviewed information related to English language development available on the PPS website.
- Reviewed various publications related to the English language development issued by The Council of Great City Schools.
- Reviewed supporting documentation for verification of compliance.



- Interviewed staff within the Funded Programs, Multilingual Services, Academic Programs, Research Assessment & Account, and IT Business Systems Departments.
- Interviewed teachers/instructional staff providing ELD instruction.
- Observed classroom instruction.
- When appropriate, a judgmental / haphazard sampling method was used to improve the overall efficiency of the audit.
- Interviewed Oregon Department of Education staff in the Multilingual and Migrant Education department.
- Analyzed available data to corroborate information obtained during interviews with PPS staff.

Conclusion

Based on the results of the audit, we found internal controls need to be strengthened to maintain the overall integrity of the school district's compliance with PPS policy and administrative directives, as well as state and federal compliance requirements to ensure students with limited English proficiency can meaningfully participate in their educational programs and services. The audit did not identify any evidence of intentional fraud, or a lack of care. However, the audit did identify instances of noncompliance in each of the key compliance categories we tested, as well as some opportunities for process improvement.

Procedure 1: Identification and Assessment of Multilingual Language (ML) Students

- Determine if the school district is identifying newly enrolled students who need to be screened for ELD Program placement eligibility.
- Determine if identified students were assessed for the ELD Program placement timely.
- Assess the adequacy of internal controls designed to ensure the identification and assessment of students who may be eligible for ELD Program placement.

Background Information:

When a student enrolls at PPS, the Language Use Survey (LUS) is required to be completed and entered into Synergy, the district's student information system. The purpose of the LUS is to determine if the student's current language exposure and use make the student eligible for ELD Program placement. If the LUS identifies a language other than English, as a language used or understood, the student may be eligible for ELD Program placement and must be evaluated for placement timely.

PPS utilizes the ELPA (English Language Proficiency Assessment) Screener to measure English language proficiency for students who may be eligible for placement in the ELD Program. The ELPA Screener is a placement test and evaluates listening, speaking, reading, and writing skills to help determine appropriate language support services.

Twice a week, Funded Programs Department staff run a report in the Synergy to identify newly enrolled students and upload the identified students into a smartsheet. Staff utilize the smartsheet to help monitor the identification and initial assessment to determine if the student is eligible for placement in the ELD Program.

If a student is a transfer from another school district, Funded Programs Department staff reach out to the student's prior school district to determine if the ELPA Screener has already been completed. If yes, they obtain the results and enter the information into Synergy. Placement in the ELD Program is based on the results of that assessment.

For newly enrolled students who were not previously assessed, Funded Programs Department staff utilize the smartsheet to notify a student's teacher/ instructional staff, as well as the school administrators, that the ELPA Screener is required. It is then the responsibility of the student's teacher/instructional staff and school administrators to ensure the student completes the ELPA Screener. Once completed, the student's teacher/instructional staff updates the status of the student in the smartsheet from "Please Screen Student" to "Screening Completed."

In support of the work of the Funded Programs Department staff, members of the Multilingual Services team would collect a list of students for whom the ELPA Screener was not completed within the expected timeframe and send it to the school administration team and the applicable Sr. Director of Schools to ask for support in getting the student's ELPA Screener completed.

After the student has completed the ELPA Screener, Funded Programs Department staff download the results of the assessment from OSAS (Oregon Statewide Assessment System) and upload the results into Synergy. Students who score "Proficient" on the assessment are not eligible for the ELD Program placement. Students who do not score "Proficient" are flagged in Synergy as ML students eligible for ELD Program placement.

Compliance Requirements:

- At enrollment, the school district is required to utilize the LUS form to identify students who may be eligible for ELD Program placement.
- When the LUS form identifies a student may be eligible, the school district is required to assess the student for ELD Program placement timely.
 - The ELPA Screener is required within 30 calendar days for students that enroll on or prior to the first day of the school year.
 - If a student enrolls subsequent to the first day of school, the ELPA Screener is required to be completed within 14 calendar days of enrollment.

Testing and Results:

We tested 50 students from the 2022-2024 school years for the above-noted compliance requirements. Testing identified the ELPA Screener for seven of the 50 students was not completed timely. The ELPA Screener for the seven students was late by: 1, 3, 5, 16, 22, 26 and 62 calendar days. We also selected an additional 10 students from the 2024-2025 school year and noted one of the 10 was 19 calendar days late.

We noted the internal controls designed to ensure the timely identification and assessment of students who may be eligible for ELD Program placement are performed by central administration staff within the Funded Programs Department who are not part of the teacher's/instructional staff's or school administrator's management structure. Programmatic implementation and day-to-day execution of required activities—including student assessment administration, are the responsibility of school administrators and teachers/instructional staff, who operate outside of Funded Programs' supervisory authority. As a result, Funded Programs Department staff have little or no recourse when their notifications and reminder notification are not effective in ensuring the assessments are completed timely.

This limitation reflects the district's governance and accountability structure, in which central administration staff in Funded Programs do not have direct supervisory authority over school administrators or instructional staff. As such, delays or noncompliance at the school level are not indicative of a breakdown in the Funded Programs Department's execution, but rather highlight the absence of a formal escalation or enforcement mechanism within the district's accountability framework.

Beginning the 2025-2026 school year, there has been some restructuring of staff responsibilities within the Funded Programs team and the Multilingual Services team. Staff performing the functions discussed in this procedure were considered part of the Funded Programs team and now are part of the Multilingual Services team. As a result, when referring to the testing performed as part of this procedure, there are references to the Funded Programs team; however, the recommendations are made to the Multilingual Services team that will need to implement the recommendations in this report to ensure compliance.

Recommendations:

1. We recommend that the Multilingual Services team strengthen its internal controls to ensure timely identification and assessment of students who may be eligible for ELD Program placement.
2. We recommend the school district enhance its training for schools administration teams to improve accountability that will support the Multilingual Services team in their efforts to

ensure the timely identification and assessment of students who may be eligible for ELD Program placement.

3. We recommend the Multilingual Services team collaborate with the Chief of Schools to develop and implement an accountability protocol that will support the Multilingual Services team in their efforts to ensure the timely identification and assessment of students who may be eligible for ELD Program placement.

To assist the Multilingual Services team in implementation of these recommendations, below are action items for consideration:

- Twice a month, email the school administrators a list of outstanding assessments and request a status update for each.
- Training for school administrators could be differentiated in a variety of ways. For example, training for first year school administrators could be more robust and detailed, while subsequent annual training could be more high-level focused on any changes in requirements, or process and procedures. Additionally, a training refresher course could be developed in Pepper and assigned to school administration teams based on input from the Multilingual Services team who will have real-time understanding of any compliance concerns at each school.
- When an assessment has not been administered within the required timeframe, notify the Sr. Director of Schools and request their support and follow up with the schools to ensure the assessment is administered.

Management's Response to Recommendation 1, 2, and 3:

Recommendation 1: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We have already begun tightening these systems and working with Funded Programs for a smooth transition of their previous process, and putting a system in place to ensure timely identification and assessment of students who may be eligible for ELD services.

Recommendation 2: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We have begun conversations with Senior Leaders and will meet with Dr. Cardona, and others overseeing schools directly to ensure we are part of a capacity-building cycle of training for school administrators.

Recommendation 3: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We have begun conversations with Senior Leaders and will meet with Dr. Cardona, and others overseeing schools directly to ensure we are part of a capacity-building cycle of trainings for school administrators. The MLL Services Team will provide guidance on the 2026-27 Core Program Guide for implementation as well as the Multilingual Services and Dual Language Immersion Program Guide coming Spring/Summer 2026.

Procedure 2: Required Communication with Student Families

- Determine if notification letters sent to families contained all required information, were timely, and if applicable, were translated in the language selected by the families for communication.
- Assess the adequacy of internal controls designed to ensure notification letters contain all required information, are timely, and if applicable, are translated in the language that the families selected for communications.

Background Information

Once a student has been assessed for ELD Program placement, the school district is required to communicate the outcome of the assessment with the student's family. The school district utilizes the ELPA Screener to determine whether the student is eligible for ELD Program placement. The results of the assessment are included in a notification of eligibility determination letter, called the Notification of Initial English Language Program Letter or a Notification of Not Qualifying for English Language Program Letter.

The notification of eligibility determination letter is generated by staff within the Funded Programs Department utilizing the Ellevation Tool. The Ellevation Tool is a platform designed in part to assist the school district with the management of the English language services and includes a feature to automatically generate the notification of eligibility determination letters that are auto-filled with applicable student data, includes all required communication elements, and is translated into the language selected by families for communications.

Each night, there is an automated job to sync applicable information from Synergy with the Ellevation Tool. The syncing of Synergy with the Ellevation Tool includes the identification of the assessment used for eligibility determination, the results of the assessment, and if applicable, the language selected by the families for communications from the school district. Following the syncing, the Ellevation Tool has all of the data elements necessary to generate notification of eligibility determination letters that are compliant with applicable requirements.

We noted the Ellevation Tool will generate those letters when prompted, even if all required communication data elements are not available for inclusion in the letter. Meaning, if the assessment used and results of the assessment were not included in the Ellevation Tool, when prompted, the letters will still generate without the inclusion of that information.

Due to the reliability of the automated job that runs each night to sync the systems, the reason the required information is not included in the Ellevation Tool is because that information has not been properly input into the Synergy system. For example, Funded Programs Department staff download the results of the assessment from OSAS (Oregon Statewide Assessment System) and upload those results into Synergy. If there were technical issues with the upload of this information into Synergy, the applicable information may not be included in Synergy and as a result, would not be included in the nightly syncing of Synergy and the Ellevation Tool. Additionally, it could be the case that staff upload the results of the assessment from OSAS into Synergy and then send the notification letters out the same day. Because the data from Synergy is not synced the same day, staff need to wait to generate the letters until the next day. This will allow the information from OSAS to be included in the nightly syncing of the Ellevation Tool with Synergy, before generating the notification letters in the Ellevation Tool.

Once the notification of eligibility determination letters are generated in the Ellevation Tool, Funded Programs Department staff then submit the letters to a contracted vendor for mailing. These letters are also submitted to the Office of Technology with a request to combine all the letters to a single PDF document that is saved in Docuware (the district's document management system) for record retention.

During the 2024-2025 school year, Funded Programs Department staff began to use the PPS Remind app, instead of a contracted vendor, to mail/deliver the notification of determination of eligibility letter to families. The PPS Remind app allows families to receive text messages, emails, and calls from the students' teachers/instructional staff or schools. Staff are able to obtain a "read" receipt in the Remind app to ensure families have received the letter. If families have not registered for use of the Remind app, or if staff do not get a "read" receipt from the Remind app, Funded Programs Department staff emails the letter to the student's teacher/instructional staff along with a request for the teacher/instructional staff to print the letter and send it home with the student.

During the 2025-2026 school year, the PPS Remind app was replaced with ParentSquare. We were informed the functionality of ParentSquare was the same, and in some ways better than the PPS Remind app.

Compliance Requirements:

- Notification of eligibility determination letters are required to be provided to families within 30 calendar days of enrollment.
- Notification of eligibility determination letters are required to:
 - If applicable, be provided in the language selected by the family to receive communications from the school, and
 - Identify the assessment used to determine eligibility and the results of the assessment.

Testing and Results:

We tested 50 students from the 2022-2024 school years for the above-noted compliance requirements. We noted a minor change in the school district's processes and procedures delivering the notification of eligibility letters for the 2024-2025 school year. As a result, we selected an additional 10 students from the 2024-2025 school year for testing. Testing identified the following results:

- The notification letters for 12 of the 50 students tested were not completed timely. The notification to the family for these students was late by a range between two and 175 calendar days. The specific number of calendar days late for each of the 12 are: 2, 5, 8, 8, 16, 26, 35, 41, 43, 54, 93, and 175.
 - 2024-2025 Testing: Two of the 10 students tested were not completed timely. The notifications were two and 16 calendar days late.
- The notification letter did not identify the results of the assessment for 10 students of the 50 tested students.
 - 2024-2025 Testing: All 10 notification letters included the results of the assessment.
- The notification letter to the family was not translated in the language the family selected for communication from the school for four of the 50 students tested.

- 2024-2025 Testing: One of 10 was not translated to the language selected by families for communication.
- Multiple notification letters were sent to families for three of the 50 students.
 - 2024-2025 Testing: Three of the 10 families were sent multiple notification letters, each dated with a different date, but otherwise identical.
- Four of the 50 students we tested scored “proficient” on the assessment were determined as not eligible for ELD Program placement. However, the Notification of Not Qualifying for English Language Development Program Letter was only sent to one of the four, and was 74 calendar days late. There is no evidence a notification letter was sent to the other three.
 - 2024-2025 Testing: We noted none of the additional 10 students scored proficient on the ELPA Screener.

Beginning the 2025-2026 school year, there has been some restructuring of staff responsibilities within the Funded Programs team and the Multilingual Services team. Staff performing the functions discussed in this procedure were considered part of the Funded Programs team and now are part of the Multilingual Services team. As a result, when referring to the testing performed as part of this procedure, there are references to the Funded Programs team; however, the recommendations are made to the Multilingual Services team that will need to implement the recommendations in this report to ensure compliance.

Recommendations:

4. We recommend the Multilingual Services team strengthen internal controls designed to ensure the timely communication of the student's eligibility for ELD Program placement.
5. We recommend the Multilingual Services team consult with the Office of Technology to develop and utilize automated prompts in the Ellevation Tool to identify an error when a field used to auto-generate the notification letter is blank, instead of generating the letter without the inclusion of the required contents in the letter.

To assist the Multilingual Services team in implementation of this recommendation, below are action items for consideration:

- Provide additional training to staff on the functionality of the Ellevation Tool to ensure staff are able to utilize the full functionality of the Ellevation Tool.
- Visually confirm contents and language of letters are accurate before sending the letter.

Management's Response to Recommendations 4 and 5:

Recommendation 4: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We have already begun an automated system and data dashboard sharing that will help streamline the process of accurate and timely program placement. The MLL Services Team will provide guidance on the 2026-27 Core Program Guide for implementation as well as the Multilingual Services and Dual Language Immersion Program Guide coming Spring/Summer 2026.

Recommendation 5: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We will

be meeting with the Office of Technology to create these automation prompts to be adjusted within the 90 days.

Procedure 3: Title III ELD Family Informational Sessions²

- Determine if all schools serving ML students completed the required community engagement, called the Title III ELD Family Informational Sessions.
- Assess the adequacy of internal controls designed to ensure all school serving ML students have the required community engagement, called the Title III ELD Family Informational Sessions.

Background Information

PPS is required to engage with parents and families of students who receive language services as authentic partners in the decision making around programs, activities, and procedures. One of the ways PPS demonstrates compliance with this requirement is by holding a Title III ELD Family Informational Sessions at each school serving ML students.

To ensure each school conducts the required Title III ELD Family Informational Sessions, at the beginning of each school year, the Funded Programs Department staff send an email reminder to the administration team at each school. The reminder includes information and support for the school administration team including a link to a Helpful Tips document where schools can view samples/templates of invitation fliers, and parent slideshows that are available in seven languages. The reminder also includes a link to contact information for interpretation services (if needed) to ensure the language needs of families are met.

Schools can hold the Title III ELD Family Informational Sessions night at their building or work with other schools in their cluster to hold a single informational session as a group. However, each of the schools must present its individual school data and programs of service. Schools, serving less than 10 ML students, can elect to invite parents to individual meetings. Possible meeting formats include:

- Parent Circle, Coffee or Tea session.
- During a regularly scheduled PTA meeting.
- As part of the school's Back to School Night.
- Two or more schools combine and have a meeting together in the morning or evening meeting times.
- Can be held as a separate event or combined with informational sessions related to the TAG (Talented and Gifted) program, Special Education or Title I³.

The Title III ELD Family Informational Sessions reminder instructs school administrative staff to complete a short form, and provides a link to the form that documents information related to the event.

The Funded Programs Department staff maintains a tracking spreadsheet that is interfaced with the form the school administrative staff complete following the event. As a result, when school administrative staff complete the form following the session, the tracking spreadsheet is automatically updated with the applicable information from the form. This tracking spreadsheet

² Title III refers to Title III of the Elementary and Secondary Education Act which provides federal funds for services for English learners and immigrant students. As a recipient of Title III funds, PPS is required to adhere to federal grant compliance requirements which includes the "Title III ELD Family Informational Session".

³ Title I refers to Title I of the Elementary and Secondary Education Act which provides federal funding to supplement state and local funding for low-achieving children, especially in high-poverty schools.

provides the Funded Programs Department staff with a tracking mechanism to ensure the Title III ELD Family Informational Sessions is held.

While Funded Programs Department staff perform the above noted procedures to ensure compliance, execution of the Title III ELD Family Informational Session is the responsibility of the individual school's administration team.

Compliance Requirement:

All schools serving ML students must hold a Title III ELD Family Informational Sessions by the date identified annually by the Oregon Department of Education. That date was October 27th, 2023 for the 2023-2024 school year.

Testing and Results:

We obtained the 2023-2024 Title III ELD Family Informational Sessions tracking spreadsheet from the Funded Programs Department team. We compared the tracking sheet to a complete list of all PPS schools/alternative programs.

We noted the tracking spreadsheet did not include the meeting details for the Title III ELD Family Informational Sessions for 27 schools/alternative programs. Seven of the 27 schools/alternative programs served less than 10 ML students and were not required to hold the information session. Funded Programs staff were able to reach out to 12 of the 27 schools to obtain evidence that their informational sessions were held. We were unable to obtain evidence that eight schools/alternative programs completed the required Title III ELD Family Informational Sessions.

We noted the district's internal controls to ensure all schools serving ML students hold the Title III ELD Family Informational Sessions are performed by central administration staff within the Funded Programs Department who are not part of the school administrator's management structure. Execution of the Title III Family Informational Session is the responsibility of the individual school's administration team who operate outside of the Funded Programs' supervisory authority. As a result, Funded Programs Department staff have little or no recourse when school administrators do not complete the form.

This limitation reflects the district's governance and accountability structure, in which central administration staff in Funded Programs do not have direct supervisory authority over school administrators or instructional staff. As such, delays or noncompliance at the school level are not indicative of a breakdown in the Funded Programs Department's execution, but rather highlight the absence of a formal escalation or enforcement mechanism within the district's accountability framework.

Beginning the 2025-2026 school year, there has been some restructuring of staff responsibilities within the Funded Programs team and the Multilingual Services team. Staff performing the functions discussed in this procedure were considered part of the Funded Programs team and now are part of the Multilingual Services team. As a result, when referring to the testing performed as part of this procedure, there are references to the Funded Programs team; however, the recommendations are made to the Multilingual Services team that will need to implement the recommendations in this report to ensure compliance.

Recommendations:

6. We recommend the Multilingual Services team strengthen internal controls to ensure all schools serving ML students hold the required Title III ELD Family Informational Sessions.
7. We recommend the Multilingual Services team collaborate with the Chief of Schools to develop and implement an accountability protocol that will support the Multilingual Services team in their efforts to ensure all schools serving ML students hold the Title III ELD Family Informational Sessions.

To assist the Funded Programs Department staff in implementation of this recommendation, below are action items for consideration:

- When the Title III ELD Family Informational Session completion form is not completed within one week of the scheduled event, notify the Sr. Director of Schools and request their support and follow up with the schools to ensure the Title III ELD Family Informational Sessions are held.

Management's Response to Recommendations 6 and 7:

Recommendation 6: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We will work with the Chief of Schools to ensure we have systems of support in place for accountability and follow-through from schools.

Recommendation 7: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We will work with the Chief of Schools to ensure we have systems of support in place for accountability and follow-through from schools.

Procedure 4: Annual Assessment, Exiting the ELD Program, and Post-Exit Monitoring

1. Determine whether all eligible ML students, including students who were opted out of the ELD Program, completed the required annual ELPA Summative assessment.
2. Determine if only the students who tested “Proficient” on the ELPA Summative were exited from the ELD program and if exited students were monitored for four years.
3. Assess the adequacy of internal controls in place to ensure all students eligible for ELD services complete the ELPA Summative annually, and are exited from the ELD Program only after testing “Proficient” on the ELPA Summative.

Background Information

Annual ELPA Summative

All ELD Program eligible students are required to complete the annual ELPA (English Language Proficiency Assessment) Summative, including students who were opted out of ELD Program services.

Families can choose to opt out their student from ELD Program services. However, PPS retains a responsibility to ensure the student has an equal opportunity to have their English language and academic needs met. Students not served/opted out of PPS’s ELD Program are required to participate in all state-required assessments, including the annual ELPA Summative.

In the school district’s student identification system (Synergy), students are flagged as ELD Program eligible based on the student’s score on the ELPA Screener. Even if a family subsequently opts the student out of the ELD Program, the flag identifying the student as an ELD Program eligible student remains in Synergy.

The Dashboard serves as a repository for demographic data, assessments, and other documents, with all information uploaded directly from Synergy. The Dashboard platform also includes a feature to generate a list of students who are required to complete the annual ELPA Summative based on whether or not the student is flagged in Synergy as ELD Program eligible. An email is sent through the Admin Portal to inform schools and teachers/instructional staff of the K–12 ELPA Summative testing window. It is the teachers/instructional staff and school administrators’ responsibility to ensure the identified students complete the ELPA Summative during one of the testing window opportunities. If parents or guardians do not want their student to take the ELPA Summative Assessment, they must sign an exemption form. If the exemption form is not signed, PPS is required to have the student complete the assessment.

Exiting the ELD Program

The ELD Program exit criteria must assess whether a child understands English well enough to benefit from classes conducted in English. For that reason, the exit criteria must be the student’s level of English language proficiency, rather than whether the student meets state academic content standards. Oregon’s Department of Education issued an executive numbered memo (004-2018-19) stating the only allowable exit process for ML students is by scoring “proficient” on the ELPA Summative assessment.

The annual ELPA Summative assessment is conducted online through the Oregon Statewide Assessment System (OSAS), and test results are automatically processed within OSAS.



Students who achieve a score of "Proficient" are exited from the ELD Program at the end of the school year.

Post-Exit Monitoring

Once a student has scored "Proficient" on the ELPA Summative, and has been exited from the ELD Program at the end of the school year, the student must be monitored for four years.

During each of the four years of monitoring, a student's teacher/instructional staff completes the ELD Monitored Student Review Form which identifies the student's test scores, names and positions of PPS staff involved in the monitoring process and includes a determination of one of the below options:

1. The student is making satisfactory academic progress, and should remain exited from the ELD Program, or
2. The student appears to be struggling and should remain exited from the ELD Program with additional support, or
3. The student appears to be struggling and the school team recommends the student reinstatement to the ELD Program.

Prior to the implementation of the Ellevation Tool, a report was pulled from DashBoard to identify students who needed to be monitored and a notice was sent to the school administration team, who then forwarded the notice to the student's teacher/instructional staff. When the Ellevation tool was introduced in July 2023, the ELD Monitor Review Form began being issued through the Ellevation Tool, and a Smartsheet was used to track its completion. The Post-Exit Monitoring consists of reviewing student academic progress in class(es) and can include teacher/instructional staff observations, work samples, grades, and state assessment data. During the four year monitoring, if a student appears to be struggling due to their language skills, it is possible for the student to be re-entered into the ELD Program with family consent.

The completed ELD Monitored Student Review Form is retained as evidence of the required monitoring of ML students who have exited the ELD program.

To ensure compliance with the annual ELPA Summative, exiting the ELD Program, and post-exit monitoring, staff within the Funded Program utilize Smartsheet for tracking and sending reminders to the student's teacher/instructional staff to remind them to complete one of the requirements.

In support of the work of the Funded Programs Department staff, members of the Multilingual Services team would collect a list of students for whom the ELPA Summative and/or the post-exit monitoring was not completed within the expected timeframe and send it to the school administration team and the applicable Sr. Director of Schools to ask for support in getting the student's ELPA Summative and/or post exit monitoring completed.

Compliance Requirements

- Students opted out of the ELD Program are required to participate in all state-required assessments, including the annual ELPA Summative.
- Only students who scored proficient on the ELPA Summative assessment are exited from the ELD Program.
- Students who have exited the ELD Program are monitored for four years.

Tests and Results:

Annual ELPA Summative

We tested 55 students from the 2023-2024 school year to determine if all ELD program eligible students, including those who had opted out of ELD services, participated in the annual ELPA Summative assessment. We noted there was no evidence that two of the 55 students tested completed the annual ELPA Summative.

Exiting the ELD Program

We tested 55 students from the 2023-2024 school year to determine if students were only exited from the ELD Program after scoring proficient on the ELPA Summative assessment. We noted all tested students were only exited from the ELD Program after scoring proficient on the ELPA Summative.

Post-Exit Monitoring

We tested 25 students from the 2023-2024 school year to determine if students were monitored for four years following their exit from the ELD Program. We noted no evidence that the post-exit monitoring was completed for one or more years for nine of the 25 students tested.

We noted the district's internal controls to ensure compliance with requirements for the annual ELPA Summative, exiting the ELD Program, and post-exit monitoring are performed by central administration staff within the Funded Programs Department. Execution of required activities - including administering the ELPA Summative, exiting the ELD Program, and completing the post-exit monitoring - are the responsibility of the teachers/instructional staff and school administrators who operate outside of Funded Programs' supervisory authority. As a result, Funded Programs Department staff have little or no recourse when their reminders are not effective in ensuring the ELPA Summative is administered to all ELD Program eligible students, exiting the ELD Program, or the ELD Monitored Student Review Form is not completed.

Beginning the 2025-2026 school year, there has been some restructuring of staff responsibilities within the Funded Programs team and the Multilingual Services team. Staff performing the functions discussed in this procedure were considered part of the Funded Programs team and now are part of the Multilingual Services team. As a result, when referring to the testing performed as part of this procedure, there are references to the Funded Programs team; however, the recommendations are made to the Multilingual Services team that will need to implement the recommendations in this report to ensure compliance.

Recommendations:

8. We recommend the Multilingual Services team strengthen internal controls designed to ensure compliance with the annual ELPA Summative and post-exit monitoring requirements.
9. We recommend the Funded Programs Department staff collaborate with the Chief of Schools to develop and implement an accountability protocol that will support the Multilingual Services team in their efforts to ensure the ELPA Summative is administered annually to all ELD Program eligible students and the ELD Monitored Student Review Form is completed.

To assist the Multilingual Services team in implementation of this recommendation, we included the following action items for consideration:

- When the annual ELPA Summative assessment has not been administered or the ELD Monitored Student Review Form is not completed within the required timeframe, notify the Sr. Director of Schools and request their support and follow up with the schools to ensure compliance.

Management's Response to Recommendation 8 and 9:

Recommendation 8: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We will work with the Chief of Schools to ensure we have systems of support in place for accountability and follow-through from schools.

Recommendation 9: We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 90 days. We will work with the Chief of Schools to ensure we have systems of support in place for accountability and follow-through from schools.

Appendix A



Administrative Directive 6.10.040-AD

English Language Learners- Emergent Bilinguals

In Portland Public Schools, English Language Learners are recognized from an asset-based perspective. Therefore, we refer to these students as Emergent Bilinguals (EB's).

- I. In order to meet the linguistic learning needs of Emergent Bilinguals the district:
 - A. Identifies and assesses students with a home language other than English;
 - B. Determines which of these students are eligible for ESL/Bilingual services;
 - C. Provides instruction in English as a second language (ESL) and in some cases bilingual instruction and support to eligible students;
 - D. Ensures access to content area curriculum;
 - E. Evaluates the progress of Emergent Bilinguals;
 - F. Informs parents of Dual Language Immersion (DLI) program options;
 - G. Exits and monitors students who meet the exit criteria.
- II. Schools will follow initial registration procedures consistent with all new students. A referral is made to a Welcome Center for students with a home language other than English.
- III. The Welcome Center staff completes the registration process, assesses language proficiency, and determines program eligibility. The procedures for this process are outlined in the ESL/Bilingual Handbook.
- IV. Students eligible for service receive ESL instruction. Instruction is provided by endorsed ESL teachers, as required by State regulations. Services are provided at all neighborhood schools.
- V. Instructional strategies and/or curriculum will be modified to ensure access to core curriculum. Modifications can include bilingual instruction, bilingual support, and sheltered instruction. Services are provided at all neighborhood schools.
- VI. The district will provide access to Dual Language Immersion (DLI) as another successful instructional model for Emergent Bilinguals.
- VII. Native Language will be recognized as an asset, and developed, when possible.
- VIII. From kindergarten through eighth grade, Emergent Bilingual students are placed by age according to district procedures. High School Newcomers will

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Administrative Directive 6.10.040-AD

English Language Learners- Emergent Bilinguals

have access to the Portland International Students Academy (PISA) depending on available space. High school students are placed according to the credits earned. Procedures as outlined in the ESL/Bilingual Handbook should be followed.

- IX. Oral, reading, and writing proficiency of each student will be assessed annually until students meet exit criteria as dictated by the ESL/Bilingual Handbook.
- X. Students are exited from the program when they meet the criteria and are then monitored for two years, following the procedures as outlined in the ESL/Bilingual Handbook.
- XI. Individual schools and the ESL/Bilingual Program will collect and maintain required documentation as outlined in the ESL/Bilingual Handbook.

AD History: Adopted 6/71; Amended 10/75; 2/79; 9/02; 3/16



Appendix B

PPS Board of Education third grade reading goal:

We must accelerate achievement for students of color in order to eliminate persistent gaps. Our goal is to close the opportunity and outcome gaps in third grade reading between students of color and their white peers by the metrics set forth, as measured by the Oregon State Assessment System (OSAS)

- African - American Students by 5.5 percentage points per year
- Pacific Islanders by 5.0 percentage points per year
- Native - American Students by 6.1 percentage points per year
- Latino Students by 3.9 percentage points per year
- Asian Students by 2.6 percentage points per year

Reading is arguably the most important and critical skill we teach in school. Therefore, a first and critical step along the Graduate Portrait continuum is preparing all students to read to learn by the end of Grade 3.

During the early elementary years, students transition from learning to read to reading to learn. They move from learning alphabetic principles and decoding site words to making deep meaning of text to which they are exposed.

Foundational reading skills unlock the pathways for all the learning in which students will engage for the rest of their lives. Disciplinary literacy—the ability to read, write and reason across a variety of content areas such as science and social studies—begins with the ability to independently and fluently read for information with great understanding.

Reading is a civil right and it is our responsibility to ensure that all students can read. The data on reading are clear: students who do not read proficiently by 3rd grade are four times more likely to leave high school without a diploma than are proficient readers.

We must ensure that all students are reading on grade level by the end of their 3rd grade year.