Goshen County School District #1

Plan for Servicing English Learners (ELs)

Goshen County School District EL

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Introduction

The purpose of this document is to outline the policies and procedures for the English Learner (EL) program in Goshen County School District #1. These policies and procedures are derived from federal and state mandates, as well as best practices in the field of EL education. In conjunction with other district programs, the EL program is designed to meet the needs of EL and former EL students. EL students are defined as students who are not yet proficient in English and have a native or heritage language other than English.

Program Purpose

The purpose of the EL program is to assist the district in meeting its mission to ensure all students are successful, by focusing specifically on the needs of all EL and former EL students. We know that at a minimum EL and former EL students must master English and academic content for them to be successful in school and in life.

Program Vision

Our vision is that all EL students will graduate from high school being college or career ready by becoming proficient in English and academic standards in at least 5-7 years and developing strong social/emotional characteristics and the other personal and interpersonal skills needed to be successful in school and in life. This vision will be realized through a carefully sequenced and well-integrated program that spans from kindergarten through high school and that truly partners with students, families, and the community.

High School	All former EL students graduate being college or career ready
Middle School	Remaining EL students exit from the program. Focus shifts to assisting students in content courses and developing the skills they will need to be successful in high school and post-secondary.
Upper Elementary	Remaining language needs are addressed and almost all students exit the EL program. Almost all students score proficient on state assessments by the end of 5th grade
Lower Elementary	EL students build a solid language and academic foundation and begin to develop the personal and interpersonal skills necessary to be successful in school

Beliefs

- Importance of high-quality instruction, standards aligned curriculum, and vertical program alignment (time it takes to become proficient)
- Effective EL programs function as part of a coherent multi-tiered systems of supports (MTSS) and not as a stand-alone program.
- Truly partnering with parents and community service providers
- Focus on the instructional core: high-quality instruction, guaranteed and viable curriculum, and building students' social/emotional well-being and person/interpersonal skills.

Instruction/Translations/Interpreting

ELL students come from a wide variety of languages, skills and backgrounds, no uniform solution, tool or process exists that will impact the learning of ELL students in the exact same way. *The Center for Applied Linguistics, however, points to the need for integrating English language with content learning to provide holistic instruction and accurate assessments and feedback in student learning.*

Ensuring success for English language learner (ELL) students requires challenging commonly held assumptions of teaching and learning for this student population. Educators and education programs must move away from making English language proficiency an end to itself and *focus on supporting success for the whole child*. Instruction should be focused on how ELL students learn best and personalized to meet each learner where they are. Valuing what they bring to the learning environment (both language, and culture).

Educators can use instructional tools to support ELL students in the four domains of language development. For example, specific writing adaptations can sometimes take commonly used writing prompts and graphic organizers to include academic English vocabulary and translation. These supports should take into consideration student levels in language proficiency standards, build on ELL students' prior knowledge, and provide appropriate scaffolding for these students without compromising rigor or content. For example, adaptive technologies could provide students with *access to instructional content that corresponds to the student's current language level and grade level that continuously increases in word and content complexity.*

Additionally, ELL students need extended time and differentiated supports based on student interests, prior learning experiences and student background. Central to teaching ELL students is the understanding and acceptance that not all students enter school at the same place in their English proficiency nor will all students progress at the same pace in their language development. *Student characteristics, such as proficiency in the student's first language, the disability status of the student and mobility and stress-related factors of the student, all play a role in how the student will access the content and pace through language development and acquisition.* Having this perspective is crucial in designing learning opportunities for ELL students.

Newcomers may need extra support as they adjust to their new academic environment. The main goal is to immerse the students in the language, however, the adjustment for the student may be overwhelming, requiring information to be translated and/or interpreted as they begin their new language acquisition.

There is a difference between **interpreting** and **translation.** The **interpreter** translators **orally,** while a t**ranslator** interprets **written text**. If a translator or interpreter is utilized, they must demonstrate an understanding of both languages, the culture, and confidentiality.

Program Goals

Student Outcomes

English Acquisition

1. All EL students exit the EL program after being enrolled for 7 years or less.
2. All EL students meet their adequate growth targets on ACCESS annually.

Academic Achievement

1. All EL and former EL students score proficient or advanced on state assessments after being enrolled for 7 years or less.
2. All EL and former EL students meet their growth targets on district and common assessments annually.
3. All EL and former EL students remain on track to graduate in high school as measured by their credits earned each semester.

Program Benchmarks

	Language	Academics	Social/ Emotional
K-2	Grow one level yearly on ACCESS (minimum all students Level 3 or 4 by the end of 2nd)	Meet growth targets annually on district assessments	Less than 20% of EL students are identified as at-risk or some risk on the Universal Screener
3-5	90% of EL students exit the program by the end of 5th grade	90% of EL and former EL students score proficient or advanced on state assessments by the end of 5th grade	Less than 10% of EL or former EL students are identified as at-risk or some risk on the Universal Screener.
6-8	Remaining EL students exit the program	All former EL students score proficient or advanced on state assessments	Less than 5% of EL or former EL students are identified as at-risk or some risk on the Universal Screener.
9-12		All former EL students remain on track to graduate	Less than 2% of EL or former EL students are identified as at-risk or some risk on the Universal Screener.

Program Overview

EL students participate in a traditional ESL/sheltered instruction program.

ESL/Sheltered Instruction

The district utilizes a traditional ESL/sheltered instruction model that is differentiated based on language need. In this model, students receive direct language instruction (ELD) in small groups for a small portion of their day/week. For the rest of the day, EL students are in mainstream classrooms with their native English-speaking peers. Students at lower levels of proficiency (newcomers) receive additional EL time, whereas those at the highest levels of English may be supported only through their mainstream classroom.

Program Leadership

District Level

ESL Coordinator/ Teacher: Nyana Sims
Office Location: Lingle Ft. Laramie Elementary School
Email: nsims@goshen1.org

EL Stakeholder Advisory Council
Participants: Superintendent EL Coordinator/Teacher Principals Teachers EL students EL parents

School Level

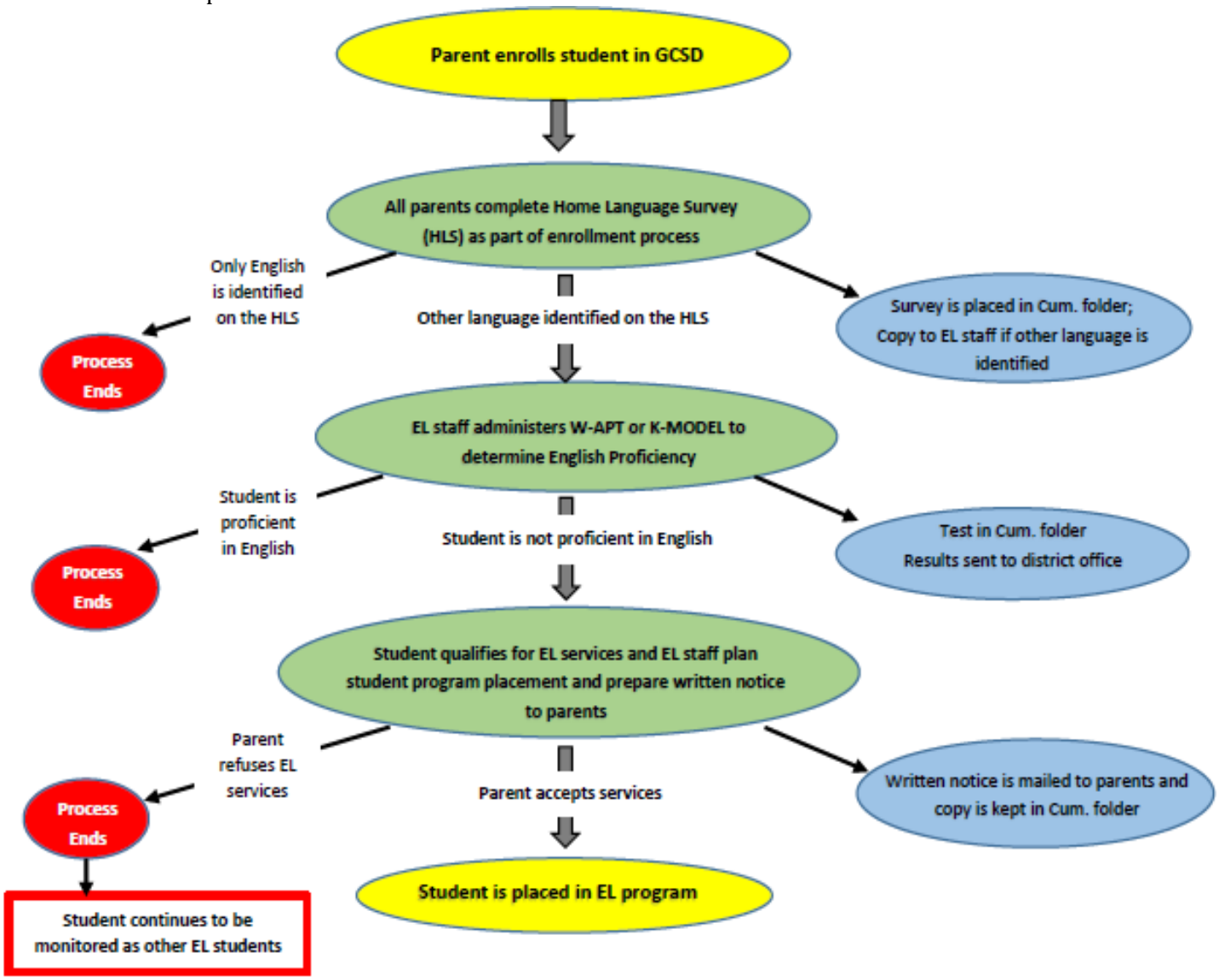
The Coordinator and building principals are jointly responsible for the implementation of the EL program at their building site.

Funding

Funding for the EL program comes from a number of sources. These include state specific funding and additional funding allocated by the district. The core EL program provided to EL students is funded through the WY EL funding model and additional funds allocated from the district's general fund.

Identification and Placement

The identification and placement of EL students is guided by state and federal guidelines. The following visual outlines this process:



Initial Enrollment and Home Language Survey

The school district follows state and federal requirements for the enrollment of all students:

- Families cannot be asked or denied enrollment based on students' or parents' actual or perceived citizenship or immigration status.
- The district can ask for a birth certificate, but not discourage or prevent enrollment of students without one.
- The district has a mechanism for identifying homeless families and follows the guidelines in the McKinney Vento Homeless Act (enrollment regardless of proof of residency or immunization).

As possible, the school provides a welcoming environment for newly enrolling families of students who may be EL. This may include bilingual signage in the building and readily accessible translation services. Immigrant families receive assistance in navigating the enrollment process of schools in the United States.

When parents enroll their child in the school district, they are required to complete a Home Language Survey to determine if the student has a language other than English in their background. Each school secretary is responsible for ensuring that the HLS is complete and a district copy is placed in the student's Cumulative Folder. If a language other than English is identified on the HLS, the secretary ensures a copy is given to the EL Coordinator.

Recent federal and state guidance has clarified that this process must be utilized for foreign exchange students, even if the student passed an English Proficiency Assessment prior to beginning their exchange (unless that assessment was WIDA Screener).

English Proficiency Screener

If a language other than English is identified on the HLS, the new student is screened for English proficiency using the WIDA online screener. The screening is conducted by one of the EL teachers who has been trained in the administration of those assessments. Results of the screening are entered into the student management system, and a copy of the score is kept by the EL Coordinator. Goshen County School District uses the proficiency cut scores provided by the Wyoming Department of Education (WDE) to determine if a student is proficient in English.

Services Plan and Parent Notification

If a student qualifies to receive EL services, EL staff at the building will review the screening results and gather other information to determine the most appropriate services plan for that student. This plan is based on the student's overall English proficiency, grade level, and other academic and social/emotional needs. The plan includes class placement recommendations, EL program recommendations, and supplemental services recommendations.

EL Coordinator is responsible for sending the Letter of Parent Notification detailing the EL services plan to parents within the guidelines required by the state (fourteen days if the student enrolls during the school year or thirty days if enrolling at the beginning of the year). Parents are only required to return the form if they wish to refuse EL services for their child. If not, the student is placed in the EL program and classified as an Active EL Student. A copy of the letter is placed in each cumulative file. If the parents refuse EL services, the original is kept in the cumulative file.

Program Placement

As an Active EL, the student is placed in services meeting state requirements for English Language Development (ELD) and best meeting the needs of the student. Students are placed in the ELD/sheltered instruction program

Instructional Program

The purpose of this section is to outline the general instruction and curriculum provided to EL students as part of their "core" services. A description of supplemental supports is provided in the following section ("Equal Access to Programs and Services").

Services by Structure

	High-Quality Instruction	Curriculum
Mainstream Classrooms	Since EL students in this program spend almost 90% of their school-time in mainstream classrooms, it is critically important that mainstream teachers use instructional practices that are effective for EL and former EL students. This broad category of practices is often referred to as "sheltered instruction" techniques. These practices support EL students in learning academic content while also increasing their English language development. It is a program standard that all mainstream teachers who have EL or former EL students are trained and effectively implement these practices in their teaching.	EL students in mainstream classrooms learn the same academic standards as non-EL students and teachers should have the same high expectations. However, those expectations are met with the necessary linguistic scaffolds and supports (sheltered instruction) to make the content comprehensible to the students. Teachers may differentiate or adapt assignments based on the linguistic needs of students and may choose to focus specifically on the most essential content for their EL students when necessary.
ELD Pull-Out	Depending on the grade level, this ranges from 30-90 minutes each week for students. During this time EL students are explicitly taught English forms and functions, grammar, and vocabulary to increase their language acquisition. Additional, EL teachers strive to connect their language learning to the content and language being learned in the mainstream classrooms. The same sheltered instruction instructional practices are used in this setting.	The curriculum in the ELD pull-out class is focused on English language development and tied to the state standards (WIDA). Where possible teachers use the same content context (science, history, language arts, etc.) as the students are learning in their mainstream classroom to assist them with their content learning and provide an applicable context for language learning. In this class, EL students are also explicitly taught language learning, study skills, and other strategies needed to succeed to succeed in school and life.
Newcomer	Varying from year to year, based on the number of newcomer students, this program typically encompasses about half of the student's school day.	The curriculum taught in the newcomer program is focused specifically on English language development. When possible connections are made to mainstream content at the students' grade levels, but the focus is on developing basic English proficiency so that the student can be successful when moved into a mainstream classroom.

Core Services by School and Language Proficiency

Staffing

All EL teachers are highly qualified (HQ) as determined by the Wyoming Professional Teaching Standards Board (PTBS) in the field of ESL (English as a Second Language). These requirements can be viewed on their website. (http://ptsb.state.wy.us.) EL teachers, for whom English is not their native language, are required to demonstrate proficiency in English on the ACTFL Oral Proficiency Interview (OPI).

English Language Learners - Teacher English Fluency Certification

Teachers working with ELL students need to be English fluency certified. Teacher English fluency certification will be checked during the hiring process and all necessary forms and documents will be housed at the Central Administration office in personnel files.

A. For those born in the U.S. or other English speaking country, who report that their first language is English, the following documentation is required:
    1. College degrees from a college or university where the language of instruction is English, AND
    2. Teacher certification from the State of Wyoming

B. For those whose first language is not English, the following documentation is required:

    One of the following:
    - A proficient level score on the TOEFL (Test of English as a Foreign Language) exam or similar English Language Fluency exam, OR
    - English Proficiency Certification from another state, OR
    - Transcripts indicating successful completion of 15 college credits in English/Language Arts courses, OR
    - College degree from an English speaking university, or some similar documentation showing successful education in an English speaking college or university

    AND

    - Teacher certification from the State of Wyoming.

Mainstream classroom teachers are recruited who have backgrounds successfully working with EL and former EL students. Having an ESL endorsement is highly encouraged. Having any Spanish proficiency is also preferred when reviewing applicants. At a minimum, mainstream teachers are highly qualified (HQ) in their area of teaching and have been trained in sheltered instruction strategies.

Professional Development

Professional development to meet the needs of EL students includes various groups of staff: administrators, mainstream teachers, EL teachers, and paraprofessionals. It is guided by frequent needs analysis conducted via teacher survey and classroom observation. Where possible it is integrated in each of the building and district professional development initiatives to ensure a coherent professional development experience for teachers.

Administrators

Administrator understanding of high-quality instruction for EL students is critically important to ensuring that all teachers implement these practices in their classrooms. They most closely monitor the instruction in their buildings through frequent walk throughs and it is critical that the feedback they leave includes the needs of EL students. Additionally, teacher evaluation is a key leverage point that must include best practices for EL students.

Mainstream Teachers

The district engages in various professional development initiatives each year that focus on building the knowledge and abilities of mainstream teachers. Where possible, sheltered instruction techniques are integrated into this development rather than as a separate topic. Specific sheltered instruction trainings are offered based on the needs of each building and specific teachers.

EL Teachers

EL teachers participate in building and district professional development whenever possible to ensure that they maintain their understanding of district initiatives and general best practices. Additionally, they participate to provide the perspective of best practices for EL students in those initiatives. EL teachers also participate in specific training when needed to improve their instructional practices.

School Secretaries

Secretaries are trained in the enrollment procedures for EL students to ensure the district complies with all state and federal regulations.

Equal Access to Programs and Services

Federal and state guidelines clearly articulate it is imperative for districts to ensure that EL students have access to core curriculum as well as supplemental services as needed. Accessing core curriculum is critically important for the success of EL students and the district makes every effort to ensure that EL students do not miss core curriculum or that content is provided in a different way.

Providing targeted ELD services is also a key component of any successful EL program and students who attend ELD will have to "miss" something else that their peers are doing.

Newcomer students often miss more core curriculum initially as they develop their English proficiency. Content needs are assessed through the district's assessment system and addressed via the MTSS (Multi-Tiered Systems of Support) after they leave the newcomer program.

Tier II and III Services

EL students should have access to appropriate Tier II and III services. The actual programming or curriculum in these services may be the same as their native English-speaking peers or different to specifically meet their individual needs. These services are provided in the classroom when possible or in pull-out settings during the school day. They are also provided through extended day (before or after school) and summer learning opportunities.

Screening to Identify Needed Support

It is critically important that benchmarks and assessments used to identify students for Tier II and III services have been validated for use with EL students and recognize the effects of language acquisition and the amount of time it takes for students to become proficient in English. For example, a newcomer who takes a reading assessment used to screen students for possible additional supports will most likely score very low on that assessment. That does not mean that he/she needs supplemental reading instruction. It simply means that he/she has not acquired enough English to be successful on that assessment. The following diagram illustrates this concept. Linguistic and academic benchmarks are plotted for each EL student when they enter the school system to provide guidance when examining progress and need for additional support

Identification of EL and former EL students, is a very critical consideration for school systems, as providing interventions that EL students do not need can actually have a negative effect on their achievement over time (often being removed from core instruction, missing opportunities for effective supplemental services, and impacting a student's social/emotional well-being).

		WIDA Levels					
		Level 1	Level 2	Level 3	Level 4	Level 5	Exit
DIBELS LEVELS	Intensive	0:100	25:75	50:50	50:50	75:25	100:0
	Strategic		0:100	25:75	50:50	75:25	100:0
	Benchmark						
	Above						

In the chart above, the general expected "trajectory" of EL students when comparing their language proficiency (WIDA) to their reading proficiency (DIBELS) can be seen by the green shading. The blue shading represents students who may be above this expectation. Orange means that students are beginning to fall behind expectations and red means they need intensive support.

The ratios found in the diagram conceptualize the amount of language vs reading support that should be provided to the student based on their language/reading levels. This ratio of reading to language may be provided in the ELD program or in a mix of ELD and supplemental reading services. A similar trajectory exists with math or other content areas.

General Decision-Making Tree

Special Education

Identification

When an EL student is in the referral or pre-referral process for Special Education, the team must include the EL Coordinator.

When an EL student is identified as having a specific disability, the EL case manager will remain on the IEP team to assist with designing and coordinating services to ensure that the student's language needs are met. IEPs of EL students should reflect their EL status and contain specific considerations for their language needs as appropriate.

Programming

EL students who also qualify for Special Education services have the legal right to receive both EL and Special Education services and one should not take precedence over the other. However, their programming may be designed to specifically meet their individual needs. For example, an EL student who also qualifies for the functional academic program will probably not attend the regular ELD class. Instead, their language development will be incorporated within their Special Education services. EL students will maintain an EL case manager that works directly with their Special Education case manager to ensure that the student's language needs are met.

Gifted and Talented Program

Identification

Ensuring that EL and former EL students have equal access to the district's gifted and talented program is a legal right of these students

Programming

Like Special Education, EL students who qualify for the gifted and talented program have the legal right to receive both services. Additionally, gifted and talented programming must be differentiated and/or adapted to meet their linguistic needs and ensure they have access to the same content as the other students participating in the program.

Other District Programs and Services

The district makes every effort to ensure that EL and former EL students have equal access to the same programs and services to which all students in the district have access. This includes adapting programs to meet the special needs of EL students when necessary to allow them full access.

These efforts may include:

- Ensuring that information is presented in a language and format that the student and his/her family will understand
- Additional recruitment efforts that specifically target EL and former EL students for optional programs
- Adapting programming to include language, culture, immigration, poverty, or other topics specifically faced by EL students

Program Exit and Monitoring

An EL student is exited from the EL program when they have met the standards required outlined by the state. The coordinator sends the Parent Notification Letter to inform the parents of the student's exit from the EL program. A copy of that letter is kept in the student's cumulative folder.

Former EL students are actively monitored for four years after being exited from the EL program. The student's case manager remains in that role during that time and continues to review the student's data and progress. A formal EL Monitoring Form is completed at the end of the first and second year, in our electronic student management system. A change of status form is sent to the Data Management Coordinator at the end of each year documenting the student's movement through monitoring. The EL Coordinator updates the EL database as appropriate and sends Parent Notification Letters each year to inform the parents of the student's progress during this active monitoring phase.

During Monitor Year 1 or 2, a former EL student may continue to receive EL services if he/she struggles academically and the Multi-Tiered System of Support Team (MTSS) determines that is the most appropriate support for that student. Additionally, students may be re-identified as EL if they continue to struggle academically and the MTSS team determines that his/her struggles may be due to language difficulties. Former EL students are strategically placed in classrooms where teachers implement high degrees of sheltered instruction and have demonstrated success with EL and former EL students.

After being actively monitored for four years, former EL students are "passively" monitored through the program data review. Former EL students are desegregated from the other district data to analyze their success rates to inform district and school improvement efforts and to identify possible former EL students who need additional support.

Parent/ Community Communication and Involvement

Parents and the community at large play an important role in the success of all students. The goal of the district is to truly partner with parents to ensure the success of their children. Parents of EL and former EL students often face many barriers to partnering with schools: language, culture, immigration status, effects of poverty, etc. The district actively seeks ways to overcome those barriers through a number of different structures. Additionally, federal and state guidelines require the district to do a number of things in this area.

Parent Communication

State and federal guidelines require that parents receive communication in a language and format that they understand. All school communication should be translated to facilitate this process: School Messenger (voice and email), newsletters, classroom communication, report cards, etc. parent meetings are also translated and held at a time that is conducive of parent attendance: parent nights, trainings, parent/teacher conferences, etc. This requirement extends to parents who are not proficient in English, regardless of their child's EL status.

Involvement

Parent involvement in education is critically important for student success. This can take many forms and includes supporting a child with homework, attending parent/teacher conferences, promoting school success, volunteering at school, etc. The district utilizes parent involvement coordinators at each school site to facilitate this work. EL staff at each site also hold at least one parent night specific to EL students and their programming at school (may be combined with another parent night). Overall this is an area of ongoing growth for the EL program and district.

Community Communication

It is important for ongoing communication structures to the community at large and especially to our community service providers. This helps in coordinating our efforts to support the families of EL and former EL students. The program evaluation and improvement plan are published annually for interested community members and groups.

Program Evaluation and Improvement

The program review process in Goshen County School District utilizes multiple methods to analyze the effectiveness of programs in the district. Primarily, these methods can be grouped into two categories:

1. Student Data Review, and
2. Program Standards Review

The Student Data Review seeks to answer the question: What impact has the programming had on student outcomes? This data analysis evaluates the program's effectiveness at the outcome level. For the EL program, this review focuses on the program goals outlined in the introduction section of this document.

The Program Standards Review seeks to answer the question: How well does the current program align with standards of high- quality programs and federal/state requirements? Ultimately, the final program review analysis combines the Student Data Review and Program Standards Review to evaluate the program's effectiveness and identify specific areas of program improvement.

This review takes place on an annual basis to identify ongoing improvement needs for the program.

EL Coordinator

The EL Coordinator ensures the proper paperwork is maintained and ensures that the EL student's needs are being met. This involves reviewing academic, linguistic, and social-emotional data for students on a quarterly basis and working with teachers and supplemental service providers to ensure EL and Monitor students are successful.

Case Management Responsibilities:

1. Serve on any Building Intervention Team (BIT) or Child Study Team that involves a student on their caseload to ensure that the linguistic and cultural needs of the student are considered.
2. Serve on the IEP team of any student on their caseload to ensure that the linguistic and cultural needs of the students are considered when designing or improving the IEP.
3. Review data and services to be able to advocate for the needs of students on their caseload.
4. Ensure site-based paperwork is accurate and procedures related to identification, placement, monitoring, and exit are followed.
5. If possible, staff remain as case managers for the same students for multiple years.

August

- Review programming for every EL student on caseload to ensure access to core curriculum, ELD, and appropriate supplemental services. (Utilize ACCESS data and past growth to identify specific language development needs and plans for support.)
- Any needs are addressed with the building principal and if needed, with the Director of Second Language Services.
- Provide classroom teachers with an overview of EL students in their classes, language levels, and other specific student information.

September

- Review screening assessment results and participate in supplemental program placement as needed to ensure appropriate placement of students.
- Conduct programming fidelity check to ensure student is receiving the services listed in his Student Profile.

October

- Review any progress monitoring data being tracked for reading and math.

November
- Review ELD interim assessment to assess progress and plan for additional language supports
- Review any progress monitoring data being tracked for reading and math.

December
- Review any progress monitoring data being tracked for reading and math.

January
- Review ELD interim assessment to assess progress and plan for additional language supports
- Review any progress monitoring data being tracked for reading and math.

February
- Review any progress monitoring data being tracked for reading and math
- Coordinate for summer school referrals

March
- Review any progress monitoring data being tracked for reading and math.

April
- Review any progress monitoring data being tracked for reading and math.

May
- Review any progress monitoring data being tracked for reading and math.
- Review ELD interim assessment to assess progress and plan for additional language supports
- Create recommendations for summer work to be shared with the summer school coordinator

State and Federal Guidelines

State and federal requirements are drawn from the following sources:

Source
Title VI: Title VI of the Civil Rights Act of 1964 Prohibits discrimination, exclusion from participation, and denial of benefits based on race, color or national origin in programs or activities receiving federal financial assistance. Title VI is codified at 42 U.S.C. 2000d et seq.; regulations have been promulgated under it in the Code of Federal Regulations at 34 CFR Part 100 (available at http://www.ed.gov/policy/rights/reg/ocr/edlite-34cfr100.html).
EEOA: the Equal Educational Opportunities Act of 1974 Prohibits the denial of equal educational opportunity in public schools on account of race, color, sex, or national origin. The EEOA is codified at 20 U.S.C. 1701 et seq.
NCLB: the No Child Left Behind Act of 2001 (Reauthorization of ESEA: Elementary and Secondary Education Act) Governs elementary and secondary education. NCLB is available as Public Law 107-110 at http://www.ed.gov/policy/elsec/leg/esea02/index.html; it is codified at 20 U.S.C. 6301 et seq. Title I is entitled, "Improving the Academic Achievement of the Disadvantaged," Title III, "Language Instruction for Limited English Proficient and Immigrant Students," and Title VI, which links to Title I, "Flexibility and Accountability."

Wyoming Department of Education (WDE) Active English Learner (EL) Identification and Reporting Guidebook

Set the conditions and methods for identification and reporting to the WDE for a student as an Active English Learner (EL) or Monitor Status Year 1 or 2 student.
https://edu.wyoming.gov/downloads/schools/wde-ell-identification-and-reporting-guidebook.pdf

Notes:

- "U.S.C" refers to the United States Code, available at: http://www.gpo.gov/fdsys/browse/collectionUScode.action?collectionCode=USCODE
- The Office for Civil Rights (OCR) at the U.S. Department of Education (ED) and the Civil Rights Division of the U.S. Department of Justice (DOJ) share authority for enforcing Title VI in the education context, DOJ is also responsible for enforcing the EEOA. A recent joint memorandum (Jan. 7, 2015) outlines guidance for districts to meet these requirements: http://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf