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Cultural Responsiveness and K-12 English Learners: Exploring Policy and Implementation Fidelity

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CULTURAL RESPONSIVENESS AND K-12 ENGLISH LEARNERS: EXPLORING POLICY AND IMPLEMENTATION FIDELITY

by

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ABSTRACT

This critical policy analysis and collective case study, informed by ethnographic techniques, involved reviews of twelve Florida school district ESOL policies (included within the 2016-2019 District English Language Learner Plans, required of all Florida districts to complete) whose English learner (EL) populations met or exceeded ten percent (10%) of their total enrollment. A priori coding of these policy documents was conducted using nine criteria pulled from the literature on culturally responsive practice (CRP), which served as the theoretical framework for the study. Subsequent observations and practitioner interviews within two schools from the same district were conducted in order to ascertain how practice seemed to align with policy, how these practices differed from site to site despite their location within the same district, and ultimately to assess the efficacy of observed pedagogical and administrative practices within the theoretical framework of CRP. Results were mixed and indicated a lack of consistency across the board in terms of policy, implementation, and culturally responsive practice.

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INTRODUCTION

Background of Study

English learners (ELs) are the fastest-growing demographic in United States public schools (Nutta, Mokhtari, & Strebel, 2012). The National Center for Education Statistics (NCES) reports that nine states had populations of 10% ELs or higher in Fall 2016, the equivalent of 9.5% of the total public-school population and representing a growth of more than a million students since the year 2000 (NCES, 2019). Despite the challenges that come with learning a new language, ELs are still children learning the same material as their native-speaking peers. Acquiring content is key, as it is for all students. Doing so requires comprehending the language of instruction, including subject-area vocabulary and academic jargon. Simultaneous acquisition of linguistic and curricular content is necessary if ELs are not to fall behind their peers, which is unfortunately happening nationwide (Nutta et al., 2012). To provide a brief snapshot, 25% of ELs from grades K-12 are not making progress toward English language proficiency (Gollnick & Chinn, 2016), and the high school graduation rate for ELs was about 57% in 2014 in comparison to 79% for all other students (Stetser & Stillwell, as cited in Gollnick & Chinn, 2016).

However, only a handful of states – including Florida, the focus of this study – currently require English for speakers of other languages (ESOL)-specific preservice university coursework (Wheeler, 2014); the Education Commission of the States (ECS; 2014) also published data showing that many states have no additional requirements for preservice and in-service teachers regarding ESOL training aside from the national provision that some form of professional development (PD) be offered to teachers with ELs in their classes. Campaign efforts of advocacy groups pushing for the rights of ELs and other marginalized populations have led to some states passing stricter regulations. In 1990, the Consent Decree was adopted in Florida,

which led to the subsequent development of university-based teacher training curricular models that infuse ESOL content into existing coursework as well as add additional course requirements (Nutta, Mokhtari, & Strebel, 2012). Similar models have been adopted in universities across the United States, but complications and concerns regarding their implementation are still present (Govoni, 2011; Wheeler, 2014). Such fractured policies and procedures at the university level nationwide have subsequently also led to lapses in policies and procedures at the K-12 level in schools across the United States.

Statement of the Problem

Research supports the fact that United States public schools are not uniformly well-equipped to reliably and effectively meet the needs of diverse ELs within their classrooms. Non-standardized national entrance and exit procedures (Bailey and Carrol, 2015; Ragan & Lesaux, 2006), a commonly observed and reported atmosphere of negativity as well as a lack of institutional support (Garza & Crawford, 2005; Mackie, 2003; Motha, 2006; Olivos & Ochoa, 2008; Salazar, 2008; Talmy, 2009), and a lack of – or inadequate – preparation in teacher education programs for mainstream instructors to work with ELs (Allen, Hancock, Lewis, & Starker-Glass, 2017; Bartolomé, 2012; Samson & Collins, 2012; Watson Miller, Driver, Rutledge & McAllister, 2005) all contribute to this problem. Many public schools are moving from separate pull-out ESOL classes to integrated classrooms that may or may not include a trained ESOL teacher (Bartolomé, 2012). This makes it all the more necessary to ensure that ELs are not thrown into an unfamiliar place with potentially unprepared instructors, particularly young newcomer ELs and students with limited or interrupted formal educational backgrounds (SLIFE) who could easily fall behind if they are unable to develop their academic and linguistic skills in a safe space with scaffolded as well as culturally relevant support.

Additionally, elementary newcomer ELs are a population which seems to be underrepresented both in current research and policy despite clear evidence of nationwide problems regarding their treatment in America's public schools. These children have just arrived in the United States and often possess minimal literacy skills in either their first language (L1) or in English (their L2). While literacy in an L1 can translate to an L2 (Cummins, 1979), students who have yet to acquire cognitive academic language proficiency (CALP; Cummins, 1979) in their L1 have no foundation upon which to build their English-language academic literacy skills. These linguistic challenges are compounded by the monumental task these young students face of learning and adapting to a new culture. As previously stated, often critical and negative outside perceptions of teachers, other students, and faculty do nothing to aid this process. One three-year ethnographic study, which consisted of interviews with school administrators and analyses of official documents, found that there was no mention of students' first language and cultures, nor were parents ever informed about ESOL-related policies (Salazar, 2008). Talmy (2009) also investigated the negative stigma attached to the term "ESOL" in a qualitative study at a high school and noted that it carried connotations of "disrespect, pragmatic incompetence, and moral and intellectual impairment" (p. 236).

It is clear that ELs are not sufficiently supported in the United States. However, a lack of consistency from state to state, district to district, and even school to school regarding ESOL-based testing, instructional methodology, curriculum, and professional development has made it difficult to grasp what is actually happening within schools when it comes to their treatment of ELs. Furthermore, Samson and Collins (2012) argue that policy and practice nationwide tend to exclude critical aspects of oral language development, academic language, and cultural diversity; a recent report by Education Week also highlighted the absence of nationwide teacher training in topics such as bias, institutional racism, and self-reflective practices (Mitchell, 2019). It is

difficult to posit solutions to problems that are not yet concretely understood nor outlined, especially when these identified problems cannot be generalized nationwide. There is a clear need, therefore, to critically explore – on a state to state basis – policies established by school districts (where and when they may exist) meant to guide ESOL-related practice. In doing so, researchers may be able to identify and frame the origin of the obstacles that stand in the way of meeting the needs of ELs across the country.

Purpose of the Study

This critical policy analysis and collective case study, informed by ethnographic techniques, involved reviews of district ESOL policies included within the 2016-2019 District English Language Learner Plans (as is required of all Florida districts to complete; Florida Department of Education [FLDOE], 2015 – Appendix A; Table 4) from twelve school districts in the state of Florida whose EL student populations met or exceeded 10% of their total enrollment. In order to ensure anonymity, districts were assigned the pseudonyms of counties from another state. Though thirteen districts met the sampling criterion, the thirteenth district (assigned the pseudonym *Wicomico*) was excluded from the study as its policy document was not publicly available. A priori coding (as described by Blair, 2015, and King, 1998) of these policy documents was conducted using nine criteria pulled from the literature on culturally responsive practice (CRP; Brown, 2007; Gay, 2000, 2002; Ladson-Billings, 1990, 1994, 1995; Richards, Brown, & Forde, 2007), which served as the theoretical framework for the entirety of the study. Observations and practitioner interviews within selected schools were then conducted in order to ascertain how practice aligned with policy, how these practices differed from site to site despite their location within the same district, and ultimately to assess the efficacy of observed pedagogical and administrative practices within the theoretical framework of CRP. A mixed-

method approach allowed for triangulation of data from various sources (Denzin, 1978; Hitchcock et al., 2005, Patton, 1999). Additional emergent themes and conclusions were also recorded, including findings regarding the existence of bilingual and dual language programs by district as well as the number of languages for which translation and instructional support is offered.

Research Questions

The following two questions guided the study:

1. In what ways, and to what extent, do ESOL policies in twelve criterion-sampled Florida school districts address culturally responsive best practices as described in the literature? (Phase I)
2. In a smaller purposive sample of two elementary schools within one of these Florida school districts, in what ways, and to what extent, do the observed and reported practices of each reflect fidelity of policy implementation? (Phase II)
    a. What kind of procedural similarities exist between these two selected schools?
    b. What kinds of procedural differences exist between these two selected schools?

The first research question (entailing a policy analysis) comprised Phase I of the study, whereas the second research question (entailing the collection of ethnographic data) comprised Phase II.

Definition of Terms

For the purposes of this study, the following terms were used within the context of K-12 education in public schools across the United States.

2016-2019 District ELL Plans. After the passing of the Consent Decree in 1990, the state of Florida established provisions within teacher education and educational practice to ensure the civil rights of ELL students, principally in reference to equity of access to educational programs (FLDOE, 2018). Districts must complete the template required by the Florida Department of Education (Appendix A; summarized in Table 4) meant to guide ESOL-related practices within their public schools for a set range of years to affirm their commitment to following the guidelines of the Consent Decree. These plans are de facto district policies and served as the data source for the first question.

A priori (or template) coding. This method of document coding uses pre-established framework, called a content analysis protocol, based upon a research-driven theoretical foundation in order to interpret and evaluate qualitative data (King, 1998; Stemler, 2001).

Axial coding (via an open-coding process). Unlike template coding, axial codes are derived from an open coding process that does not place a limit upon which types of information will be coded by the researcher. All elements of interest are recorded so emergent themes can organically emerge. Themes are divided into more specific subcategories by pairing relevant information together, which then become axial codes (Blair, 2015; Glaser & Strauss, 1967; Strauss & Corbin, 1998).

Basic Interpersonal Communication Skills (BICS; Cummins, 1979): BICS is a term used to describe informal and social spoken language, which is often acquired quickly by young language learners (including ELs) and can be misconstrued as native-like fluency and language

proficiency by instructors. However, it is commonly represented as only the tip of the linguistic iceberg.

Cognitive Academic Language Proficiency (CALP; Cummins, 1979): CALP refers to more advanced academic language, including formal written and spoken conventions and low-frequency, high-level vocabulary; it is often represented as the larger, hidden part of the linguistic iceberg. CALP takes much longer to fully develop in second-language learners as well as in L1 students with an inadequate literacy foundation upon which to build their academic skills.

Culturally responsive practice (CRP). The theoretical framework of this study is principally based upon the research of Gay (2000) and Ladson-Billings (1990, 1994, 1995) and refers to pedagogy and school-level procedures that acknowledge unique learner backgrounds and perspectives. The goal of CRP is to make education meaningful and relevant for all students.

Elementary education. Within the context of education in the United States, elementary grade levels range from kindergarten (K) through grade 5, which approximately correspond to student ages of 5-10.

English Language Learners (ELLs; more commonly, ELs). These are students officially enrolled in the school's English for speakers of other languages (ESOL) program, which requires them to receive some form of catered linguistic instruction and scaffolded support in addition to the standard curriculum. The exact nature of this support as well as the requirements of the ESOL program vary from place to place but share the commonality of including leveled placements and employing one or more ESOL specialists to work with the students.

English Language Proficiency (ELP). ELP assessments measure a student's English ability upon entering a new school to determine placement into ESOL as well as their proficiency at the end of a semester or academic year in order to decide upon their readiness to

exit the program.

L1. This term is commonly used shorthand for the first (or home) language of a second-language learner. In some rarer cases, children simultaneously acquire two languages from birth, which can make the L1 difficult to define.

L2. The L2 refers to the second language, or target language, a student is trying to acquire. For the purposes of this study, that language is English. It is important to note that, in some cases, an L2 represents not the second language of a student but rather the third or even the fourth (or more).

Second language acquisition (SLA). Refers to the field that concerns itself with the study of how second (and additional) languages are both taught and acquired. In this case, English is the second language being discussed, though the term applies to any language-learning context.

Conceptual Framework

Culturally Responsive Practice (CRP)

Within this study, CRP was utilized as an institutional-level umbrella term to include school policies and procedures that surpass classroom-level pedagogy; however, this theoretical framework borrows extensively from the seminal work of Gay (2000), who describes culturally responsive *pedagogy* as "practices that can be defined as using the cultural knowledge, prior experiences, frames of reference, and performance styles of ethnically diverse students to make learning more relevant and effective for them" (p. 29). Richards, Brown, and Forde (2007) broaden this frame of reference to include the overall organization of the school (including administrative structure and use of physical space in the design and arrangement of classrooms), services and practices of the institution, and community involvement. Reform must occur in all

three of these areas in order for the benefits of culturally responsive pedagogy – first described by Ladson-Billings (1990, 1994, 1995) in relation to African American students within underserved schools – to reliably and consistently meet the needs of marginalized student populations. Alternately, the term *culturally sustaining pedagogy* has been employed by some researchers (i.e., Paris, 2012) to support the preservation of cultural and multilingual education.

Suggestions from major researchers within the field of CRP were compiled and utilized for this study to create a list of procedures that could be searched for within district policies. As research has shown that educational policies tend to exclude aspects related to culture (Samson & Collins, 2012) and because K-12 students in the state of Florida come from diverse cultural backgrounds, the researcher decided to adapt Richards, Brown, and Forde's (2007) interpretation of CRP at an institutional level to critically analyze the 2016-2019 District ELL Plans.

Policy Analysis

Policies are codified documents meant to govern practice within a specific sphere and geographic range; they can bring with them the danger of misinterpretation and misunderstanding (Spillane, 2004). In contrast to the conventional, simplistic view that assumes practitioners always comprehend the intentions behind policy and consciously choose to follow or ignore its regulations (i.e., Firestone, as cited in Spillane, 2004), factors such as the unpredictability of human cognitive processing and interpretation (Weiss & Cohen, as cited in Spillane, 2004), the structure, rules, and prevailing viewpoints of society (i.e., Lin, as cited in Spillane, 2004), and professional discourse within a particular field, such as education (Hill, as cited in Spillane, 2004) can lead to "local officials understand[ing] the message in different ways, not necessarily those state policymakers intend[ed]" (Spillane, 2004, p. 2). Despite research that has shown school district officials charged with drafting policy do their best to

follow state policies and tend to respond dutifully to mandates, local implementations of policy (which would, in this case, entail the 2016-2019 ELL Plans within individual schools) sometimes fall short of the original state and district-level goals (Spillane, 2004). Malen and Knapp (1997) echo these concerns, explaining that individuals designated to enact policies on paper may struggle to make practical sense of what they are being asked to do. "The stark and stubborn disparities between a policy's stated aims and actual effects seem to defy explanation in part because social conditions to be attended are tangled webs of problems with symptoms, sources, and 'solutions' that are neither apparent nor readily addressed by policy provisions" (Malen & Knapp, 1997, p. 419). Spillane (2004) even compares this process of policy adaptation to the "telephone game," wherein a message is whispered from one person to the next down a line – by the end, the original message has often dramatically changed.

Such "tangled webs of problems" (Malen & Knapp, 1997, p. 419) also impact the composition and creation of policies, which truly are representations of current thought, movements, and initiatives taking place in larger society (Malen & Knapp, 1997). For this reason, scholars approaching policy analysis can benefit from the adaptation of different theoretical perspectives in order to generate more specific, distinctive pictures of its implications: "Each unearths aspects and intricacies of policies that would be easily missed with a single lens look" (Malen & Knapp, 1997, p. 435). Malen and Knapp (1997) propose rational, organizational, political, symbolic, and normative perspectives from which researchers could analyze policy. For this study, the theoretical framework of CRP (Ladson Billings, 1990, 1994, 1995; Gay, 2000, 2002; Brown, 2007; Richards et al., 2007) serves as a perspective that addresses both political and symbolic concerns. Symbolic factors refer to unstated yet inherent connections between policy provisions and what they signify on a deeper level (Malen & Knapp, 1997), which are called for with such a meaning-laden topic as ESOL. This field is inextricable from current

political issues related to immigration as well as from the prevalence of social biases, racism, and ethnocentrism in society, all of which must be adequately considered as potential influencers of policy formation and its implementation.

Spillane (2004), in his book "Standards Deviation: How Schools Misunderstand Education Policy," critiques the implementation of Michigan State math and science standards between the years of 1992 and 1996. For the purposes of the study he describes, he had criterion-sampled nine Michigan school districts from city, suburban, and rural classifications in order to observe the fidelity of their policy provisions. He also distributed questionnaires, interviewed officials and practitioners, and conducted observations at purposively-sampled schools within each district to observe potential variation in the ways each of these schools had chosen to implement the new state standards. Though he documented mixed successes, there were certainly no generalizable patterns that applied to every context within the state. He also found that many of the teachers had not received sufficient training to enact the prescribed changes (Spillane, 2004). Studies with similar results were also cited, including one from Colorado that had recorded "great variability" in practices of educators across the state in response to mathematics reforms, ranging from teachers using simple checklists to fundamentally changing their classroom techniques (Haug, as cited in Spillane, 2004). Another study, conducted in California, had demonstrated how "teachers' sense making was a critical factor in accounting for their implementation of the reforms" (Coburn, as cited in Spillane, 2004).

Finally, Malen and Knapp (1997) eloquently describe the scope of a policy's potential implications in a quote that summarizes the problems that come with attempts at educational reform:

> By some accounts, policy is so powerful it can hamstring schools, handcuff educators, and harm students; or conversely transform schools, empower educators, and inspire

> students. By other accounts, policy is so powerless it can be routinely ignored, ingeniously circumvented, effectively offset by forces that lie beyond the reach of policy, or essentially neutralized through adjustments that convert policy initiatives into conventional practices. (pp. 419-420)

Collective Case Study (CCS)

Case studies allow a researcher to closely examine particular instances that could shed additional light on a theory, phenomenon, or topic of interest. They do not describe a research methodology, but instead dictate the approach that the researcher will take in order to answer his or her research questions (Baxter & Jack, 2008; Stake, 1995). Though individual cases cannot be generalizable to larger populations, they can add context to theory as well as increase the breadth of knowledge understood by the researcher and their audience (Stake, 1995). Descriptions and narrative reports of specific events and occurrences are often more readily recalled by readers and can make nebulous and abstract concepts more comprehensive and relatable as they apply to a real-world environment (Stake, 1995). Collective case studies (sometimes interchangeably used with the term *multiple* case study), allow a researcher to more deeply explore variations between carefully chosen individual cases, which permit analyses both within and across them (Stake, 1995; Yin, 2003, as cited in Baxter & Jack, 2008). This study first observed and compared the cases – as documented on paper by their policies – of twelve school districts in Florida with student populations that consisted of at least 10% ELs; it then more qualitatively explored two cases of schools within the same district, which allowed for a comparison of schools ostensibly following the same policy.

Overview of the Methodology

A mixed-methods design was employed to critically analyze the content of 2016-2019 ELL Plans from Florida school districts through the lens of CRP and to subsequently explore the influence of policy on practice within selected public elementary schools. To answer the first research question, hereafter referred to as Phase I, the researcher created a content analysis protocol (Appendix B) in order to enable a critical policy analysis (Dubnick & Bardes, as cited in Malen & Knappe, 1997; Spillane, 2005) of the District ELL Plans using a CRP-based framework. Scholarly journal articles and extant examples of similar policies were consulted to formulate nine criteria used for a priori (also called template) coding (King, 1998; Stemler, 2001) that should be represented within the policy of a school district concerned with cultural responsiveness. The design of the required ELL Plan template (Appendix A; Table 4) was taken into account when considering scope. Table 1 presents these criteria (further explicated in Appendix C). Each category is paired with relevant literature that supports its presence in the study. Research-informed inclusion criteria for each a priori code assisted in identifying instances of each theme within policy documents (Maykut & Morehose, as cited in Saldaña, 2009), which were then tallied. Corresponding tables disclose these frequencies by category for each school district in order to more easily enable comparison; emergent patterns are also described.

Table 1

Phase I: A Priori Codes for Policy Analysis

A Priori Code	Citation(s)	Inclusion Criteria*
1) Cultural education and responsiveness included within teacher development	Montgomery, 2001 Gay, 2002	• Looking at one's own attitudes and practices (Montgomery, 2001) • Knowing ethnic groups' cultural values and contributions (Gay, 2002) • Knowing how to use multicultural instructional strategies and add multicultural content to the curriculum (Gay, 2002)
2) Recommendation of culturally responsive pedagogical techniques	Brown, 2007 Montgomery, 2001 Bazron, Osher, & Fleischman, 2005 Gay, 2002 Harriott & Martin, 2004	• Explicit instruction the student can understand (Gay, 2002) • Including material related to the "hidden curriculum" (Montgomery, 2001; Navarro, as cited in Brown, 2007; Bazron, Osher, & Fleischman, 2005; Gay, 2002) • Scaffolding techniques (Gay, 2002) • Journal writing (Montgomery, 2001) • Cooperative learning groups and discussions (Harriott & Martin, 2004; Navarro, as cited in Brown, 2007)**
3) Provision of diverse curricular resources that portray individuals from different backgrounds	Richards, Brown, & Forde, 2007	• Supplementation of instruction with more relevant material (Richards et al., 2007) • Awareness of stereotypical materials (Richards et al., 2007) • Bulletin boards that contain culturally relevant images and themes (Richards et al., 2007) • Student-recommended and/or produced resources to add context (Richards et al., 2007)

A Priori Code	Citation(s)	Inclusion Criteria*
4) Establishment of a relationship between the school, students, their families, and the surrounding community	Richards et al., 2007	• Mentions of communication to parents of ELs (Richards et al., 2007) • Invitations for parents and family members to participate in community events (Richards et al., 2007) • Eligibility of parents to join committees and contribute to decision making (Richards et al., 2007) • Mentions of parental workshops and conferences (Richards et al., 2007) • Discussion of respect for parents, guardians, and other family members (Richards et al., 2007)
5) Promotion of mutual respect among students	Richards et al., 2007	• Enforcing standards of behavior (Richards et al., 2007) • Teachers serving as role models in the classroom (Richards et al., 2007) • Anti-bullying policies (Richards et al., 2007) • Understanding of cultural norms behaviors to avoid unfairly penalizing ELs (Richards et al., 2007)
6) Multiple forms of assessment for students to demonstrate their knowledge	Alaska Standards for Culturally Responsive Schools (n.d.)	No additional criteria; the researcher additionally noted the type of assessment included, including whether L1 assessments were offered.
7) Availability of staff and personnel from similar cultural backgrounds	Alaska Standards for Culturally Responsive Schools (n.d.)	No additional criteria; any indications of school employees being from other countries or indications that staff from differing cultural backgrounds could be made available to the students and their parents were coded and reported.

A Priori Code	Citation(s)	Inclusion Criteria*
8) Accessibility of documents and translators for represented home languages	Commonly recommended; also a prompt within the FLDOE 2016-2019 District Plan template	No additional criteria; any additional mentions offered by each district were coded and the quality of the provisions made available by each district were critically assessed.
9) Promotion of diversity as an asset and support of cultural preservation	Brown, 2007 Chamberlain, 2005 Richards et al., 2007	• Multicultural nights or events that celebrate culture (Brown, 2007) • Expression of the district's desire to value and preserve the culture(s) of students (Chamberlain, 2005) • Encouraging teachers to learn about the histories and cultural practices of the students in their classrooms (Richards et al., 2007) • Cultural diversity workshops (Richards et al., 2007) • Dual and bilingual language programs were separately reported for each district, as they do not deal directly with culture but do value the L1 of students.

*Criteria are further elaborated from these shortened versions in Appendix C.
**Additional inclusion criteria for "Recommendation of culturally responsive pedagogical techniques" can be found in Appendix C; this is a sampling of many CRP-based strategies.

For the second research question, hereafter referred to as Phase II, semi-structured interview data (see protocol, Appendix D) observation data (see instrument, Appendix E), and any additional relevant material seen during observations were open coded and then axial-coded for emergent themes (Blair, 2015; Glaser & Strauss, 1967; Strauss & Corbin, 1998); these themes were then compared against the research-suggested a priori codes as well as to the conditions outlined within district ELL Plans to gauge the consistency of site-site practices as well as to assess policy implementation fidelity, particularly as was relevant to CRP. Blair (2015) cites the benefits of combining a priori (template) coding and open coding with both complex and diverse types of data – as the two research questions necessitate – in order to best suit a researcher's particular goals. In this case, school visits and practitioner interviews introduced

additional themes and observations that existed outside the created template codes meant to analyze policy via a theoretical lens. These additional themes, however, could prove significant when describing and/or positing potential explanatory factors behind site-based pedagogical and administrative practices. Faherty (2010) states that there are "no absolute hard-and-fast rules in coding" (p. 59); nevertheless, informed decisions must be made to most effectively review qualitative data.

Table 2 summarizes the procedures for the two research questions in this study.

Table 2

Research Questions, Methods, and Data Sources

Research Question	Topic	Research Methods	Data Source(s)
1	2016-2019 District ELL Plans (policies) via the theoretical lens of CRP	Content analysis protocol (Appendices B & C) using nine a priori codes derived from the research on CRP (Table 1) Hand-tallying of frequencies by code and descriptive/comparative reporting of results from district to district	2016-2019 District ELL Plans (FLDOE, 2015) for twelve Florida districts (Table 3) with ESOL populations of at least 10%
2	Site-based Observations and Reports of Policy Implementation and Practice	Two elementary-school site observations within one district (Appendix E) Interviews with one practitioner from each site (Appendix D) Data transcribed and open-coded for emergent themes and compared to previous a priori codes related to CRP	Non-participant observation data from two elementary schools Semi-structured, confidential interview data from one practitioner at each site
2a, 2b	Comparison of Site-based Practices	Emergent themes from research question #2 critically compared from site-site	Extant observation and interview data collected for research question #2

Target Population

This study was concerned with the Florida school districts that possessed the largest proportions of ESOL students, as these are the districts with the greatest need to establish and implement effective and culturally relevant policies. The NCES publishes publicly available school enrollment and demographic data. Explorations of these data from the 2015-2016 school year, right when the 2016-2016 ELL Plans were set to take effect, show that there were thirteen districts (of Florida's *N* of 67) that reported 10% or more of their student populations as being ELs. These districts served as the criterion sample for the first research question, as the

researcher wanted to choose the districts that had the highest numbers of ELs at the time of the policy's inception in 2016. Updated percentages published by the FLDOE from the 2018-2019 school year have also been included in Table 3, which shows that all of the selected districts still enrolled at least 10% ELs at the time this study was written. The FLDOE did not publish total EL enrollment numbers by district.

It is important to note that, in Florida, all public-school districts are at the county level; this means that each of the school district names below also represent a county. One of these counties, however, did not make their District ELL Plan publicly available (*Wicomico*), nor did anyone reply to an email request to access the policy document, so it was excluded from the study. Table 3 lists all remaining districts (assigned pseudonyms), their total EL enrollment, and the percentage those EL enrollment numbers represented of their total student enrollment statistic. It also includes FLDOE-reported percentages of ELs from 2018-2019.

Table 3

Districts*, Enrollment, and EL Percentages

District	Total EL Enrollment: 2016*	Percentage (%) ELs: 2016	Percentage (%) ELs: 2019
1) Allegany	69,102	19.3	19.5
2) Calvert	11,405	18.4	20.6
3) Howard	1,068	14.8	12.7
4) Frederick	28,537	14.5	15.9
5) Charles	2,687	14.1	13.0
6) Montgomery	5,944	12.9	15.5
7) Carroll	804	12.5	12.2
8) Cecil	23,391	12.4	10.2
9) Worcester	5,886	12.2	13.2
10) Talbot	25,290	11.2	12.8
11) Kent	30,130	11.2	11.1
12) Somerset	11,069	10.9	12.1
*13) Wicomico***	*179*	*10.3*	*11.7*

Note: All data collected from the NCES website (https://nces.ed.gov) and the FLDOE (https://FLDOE.org)
*All districts have been assigned the pseudonyms of counties in another state.
**This district did not make its 2016-2019 ELL Plans publicly available and has therefore been excluded from the study.

Sampling Method

For Phase I, Florida school districts were criterion sampled (Patton, 2002) based on their reported enrollment numbers of ELs as made available on the NCES website for the 2015-2016 school year, as this was the first year the policies took effect. Patton (2001) describes criterion sampling as facilitating the exploration of cases that meet a predetermined factor of importance (p. 238), which in this case was an ESOL population large enough to raise concerns regarding their widespread treatment across a school district. Data regarding the percentage of ELs were computed using SPSS from the original district variables reported of *total enrollment* and *total number of ELs* in order to identify which of Florida's 67 districts enrolled 10% or more ELs within their public schools. Because the enrollment numbers varied so widely from district to district, raw numerical data would not have been an effective means of looking at the overall proportion of ELs. Therefore, "percentage of ELs" was computed by dividing the number of ELs by the total enrollment. According to the FLDOE (2013):

> Florida Statutes define an English Language Learner (ELL) as "an individual who was not born in the United States and whose native language is a language other than English; an individual who comes from a home environment where a language other than English is spoken in the home; or an individual who is an American Indian or Alaskan native and who comes from an environment where a language other than English has had a significant impact on his or her level of English language proficiency; and who, by reason thereof, has sufficient difficulty speaking, reading, writing, or listening to the English language to deny such individual the opportunity to learn successfully in classrooms where the language of instruction is English [section 1003.56(2)] (p. 1).

These criteria therefore govern demographic reporting procedures of Florida schools. There is the possibility, as with all publicly accessible data, that numbers could be under or over-reported. In this case, it is possible that students who have recently exited ESOL services may not be counted in the data. If reporting procedures are consistent between districts, however, then any such disparities should be equally represented among them. The 2018-2019 percentages reported by the last column of the table might reported slightly differently than NCES data for similar reasons (the NCES has not yet published enrollment data after 2017), but they serve to show that the twelve districts selected for the sample all still enrolled at least 10% ELs at the time of the study's conduction. EL enrollment numbers were not published by the FLDOE by district.

The two elementary school sites for Phase II were purposively sampled (Creswell & Plano-Clark, 2011; Patton, 2002) based on their location within one of the twelve districts of interest, their accessibility, and the willingness of the principal to participate. Factors such as the size and location of each school, particularly in relation from one to the next, were noted, as they are potentially significant variables that could impact policy decisions and school procedures. Due to district IRB requirements, all districts – as well as the two schools visited by the researcher – were assigned pseudonyms.

Data Collection

Eleven of the twelve school districts being analyzed by this study have made their 2016-2019 ELL Plans readily available via a Google search. Calvert's (pseudonym) policy was not publicly accessible, but a district official replied to a request made by a dissertation committee member to email a PDF version of the document to the researcher; because of this, Calvert could still be included in the sample. District officials from Wicomico (pseudonym) were unresponsive

to the same request. Most policies were accessed from the district homepages in downloadable PDF format (see Appendix I for a complete list of sources and URLs).

Semi-structured interviews were conducted over the phone with one practitioner – a mainstream teacher – from each of the two chosen sites using an interview protocol (Appendix D); additional follow-up questions were asked in response to answers that proved particularly relevant to the purposes of this study. Interviews were recorded but do not include the names of the participants; confidentially was ensured by assigning a pseudonym to each interviewee and not recording initial introductions between the researcher and participant. Any quotes that identified the school or district that were recorded on audio were omitted during interview transcription, which was done by hand by the researcher without any outside assistance. Audio was saved but is stored only in a document folder on the researcher's password-protected personal computer and on iCloud. Non-participant observations of the school environment (meaning observations in which the researcher did not directly interact with students or classroom procedures) involved recording relevant sights, documents, and displays at two sites using an observation instrument (Appendix E), and any extant documents and realia of interest were occasionally noted and photographed by the researcher in order to analyze the themes they introduced. Both observations took place on Friday, April 5. The first one, at Site A, lasted 1 hour and 25 minutes (from 9:15-10:40 am); the second one, at Site B, lasted 50 minutes (from 11:20-12:10).

Data Analysis

The research questions were answered using a combination of descriptive statistics representing the twelve a-priori-coded policy documents (Phase I) and qualitative techniques documenting and reporting upon the collection of ethnographic data (Phase II).

Phase I

The first research question of this study required a critical policy analysis of the 2016-2019 District ELL Plans for the thirteen districts in the state of Florida with EL populations of at least 10%. The researcher printed all of the documents on paper and manually highlighted instances of the inclusion criteria for each CRP-informed a priori code (Table 1; more extensively described in Appendix C). Occurrences of each code were tallied and reported in a frequency table (see template in Appendix B); one table is presented for each of the nine codes in Chapter 4. Each table includes the frequencies for each district and, when relevant, the inclusion criteria for discrete codes. The total recorded instances of the code for all districts combined is also reported. Totals of how many districts included instances of the code at all within their ELL Plan are included in an initial table (Table 6) that presents the gross sums of each of the nine codes without their inclusion criteria. Thick-rich descriptions and elaborations upon specific notes, examples, and observations by code summarize and contextualize the overall findings.

The content analysis protocol used to create the template for the a priori coding process was formulated by consulting the research on CRP and pulling criteria that could be included within the pre-assigned template for the 2016-2019 District ELL Plans (Appendix A; Table 4). Credibility techniques ensured the suitability of the content analysis protocol. These techniques included debriefing with the faculty and the researcher to confirm the appropriateness of the codes and verifying the internal validity of the instrument by having two faculty members from the dissertation committee code a policy document using the same template and checking for consistency across their responses (Ryan & Bernard, 2003).

Phase II

To answer the second research question and its two sub-questions, the researcher used transcribed interview and observational data from each of the two elementary school sites (one practitioner at each site was interviewed) to open code the text for emergent themes by hand. Axial coding was then conducted to pair similar emergent themes into larger categories; these categories were narratively and critically reported by the researcher as well as compared to the ideal CRP criteria included in the content analysis protocol. Finally, both schools were assessed for their apparent fidelity of policy implementation and comparisons were made from site to site.

Credibility techniques included member checking at the end of each interview to ensure an accurate portrayal of interviewee thoughts, beliefs, and opinions; this is a form of participant validation of data (Creswell & Miller, 2000). Member-checking involves recounting what was heard and understood by the interviewer to the interviewee, providing the participant the opportunity to clarify, alter, or retract a statement.

Significance of the Study

Although studies in second language acquisition (SLA) have deeply explored theories surrounding pedagogical approaches and assessment strategies and their ultimate effect on ESOL student performance, these studies have generally failed to account for the importance of environmental and sociocultural factors when it comes to overall academic experience and success, particularly for the underrepresented population of young EL newcomers at early elementary grade levels. The theoretical framework of CRP accounts for these variables as well as advocates for the knowledge, talents, and experience immigrant children bring with them to classrooms in the United States. Furthermore, few researchers have taken a closer look at existing policies by state in order to identify any potential issues and inconsistencies or attempt

to highlight successes that could prove replicable in other districts and schools. Nationwide statistical data do not account for the variability of contexts from state to state nor for the differences between districts within states and schools within those districts. Ideally, this study will serve as a foundation for future exploratory analysis of ESOL procedures in Florida and the effects these practices have on sociocultural adaptation. Researchers in other parts of the country may also consider delving into practices within their own home state; should this action be repeated, the eventual formation of an expansive database documenting ESOL policies and procedures across the United States may be possible.

Delimitations

1. The study focused only upon certain districts in the state of Florida that met the population-based inclusion criteria.
2. The ethnographic-informed research conducted for the second research question are not longitudinal nor extensive in nature, serving as a snapshot of policy implementation rather than as a comprehensive review of school-based practices across the state.
3. The particular ESOL policies that were analyzed may be entirely changed at the beginning of the 2019-2020 school year, meaning a potential update of the study upon review of the updated policies.

Assumptions

1. The 2016-2019 ELL Plans have not changed since their inception and/or that the versions accessed from all districts have been updated should they have changed.
2. Observations reported by the researcher will represent common rather than exceptional practices at each site.

3. Interviewed practitioners are familiar with the 2016-2019 ELL Plans as well as cognizant of potential challenges that may be facing the ELs in their particular class and/or school.

Organization of the Study

This study is organized into five chapters, further defined in the Table of Contents with their corresponding page numbers. Chapter 1 includes the background of the study, the problem statement, the two research questions that guided the conduction of the study, the definition of frequently used terms, an explanation of the theoretical framework of CRP, a brief overview of the proposed methodology, and the significance of the research; delimitations and assumptions are also outlined.

Chapter 2 consists of a literature review that discusses established issues in public schools in the United States when it comes to the support of young newcomer ESOL students, testing practices, preservice training in ESOL, in-service professional development, existing ESOL and mainstream curriculum, and the effect of teacher attitudes and stereotypes on the educational environment and student success. The over-arching theme of CRP guides this critical review, which touches upon inconsistent practices nationwide and the necessity of student-centered reform. Additional theoretical perspectives to CRP are introduced that also demonstrate the necessity of focusing upon sociocultural factors in educational contexts.

Chapter 3 comprehensively describes the methodology of the study, further explaining the policy data that was a priori coded by the researcher and the details of the coding process. It also describes the selection of the school sites and interview participants and methods taken to collect the qualitative data for the second research question before summarizing the data analysis procedures and credibility techniques.

Chapter 4 comprehensively presents the findings of the two research questions. It then

elaborates upon the credibility techniques meant to ensure the validity of the results of the coding procedures. Chapter 5 further explores the meaning of these findings as well as their importance and their practical and theoretical implications; recommendations for future research and ultimate conclusions then follow after study limitations are disclosed.

Summary

Due to variations in ESOL-related practice across geographic locations in the United States, there is a need to concretely understand what is happening within states, beginning with district-level policy and practices within schools to identify both successes and failures. This study specifically took a look at the state of Florida. Gaps in research focused on young elementary ELs, particularly newcomers to the country, and the effect of sociocultural factors on their success justified a theoretical framework of CRP in order to ascertain how focused policy and practice are on facilitating the cultural transition and adaptation process of ELs. Ultimately, conclusions from this research are intended to align policy with practice and also to describe how a balance could be found between meeting state standards while still addressing the unique linguistic and sociocultural needs of newcomer ELs.

CHAPTER 2
REVIEW OF THE LITERATURE

Introduction

Policymakers and practitioners have been faced with the monumental task of catching up and formulating policies to suit the needs of the fast-growing and diverse population of English learners in this country. While the numbers of preK-12 students overall increased by 8.5% between the years of 1998-2008, EL populations rose by a staggering 53.2% within that same time frame (Nutta et al., 2012, p. 3). Acknowledging the necessity of catered English-language instruction for these students is not sufficient to ensure their needs are being met, nor is isolating them from their native-speaking peers in a pull-out setting (i.e., removing students from their classrooms for part of the day for ESOL instruction) without making a concerted effort to better adapt the classroom environment in which these ELs will actually spend the majority of their time.

As universities work to restructure their methods of preservice teacher education and infuse EL training in order to combat many of the nationwide failures within K-12 schools (further elaborated upon in this chapter), experts in the field remind both professors and their students that collaboration between faculty members is a critical factor when it comes to successfully teaching all students and establishing a universally supportive and nurturing educational environment, especially for those students who require additional support (Nutta et al., 2012). One ESOL teacher or paraprofessional, for example – or even a few of them together – cannot work in a vacuum and without the support of content-area instructors and additional faculty members (Nutta et al., 2012). This review of the literature elucidates and explores facets of teacher training and pedagogical practice that could be improved upon with revised university and school district policies as well as highlights additional concerns, grounded in theory, that

practitioners and policymakers should keep in mind as they initiate future reform efforts.

It is evident that policymakers and academics cannot agree on what is best for the students and teachers they serve (Fraser, 2007); the increasingly lofty educational requirements for teachers instated over the past few decades (Fraser, 2007) should ideally have led to evidence that graduates are well-prepared and effective. Instead, however, the resulting workforce is racially and socioeconomically unbalanced (Fraser, 2007; King, 1993; Samson & Collins, 2012), frequently unprepared to instruct minority, English learning, and marginalized populations (Bartolomé, 2012; Mitchell, 2019; Samson & Collins, 2012; Watson, Miller, Driver, Rutledge, & McAllister, 2005), and occasionally not even qualified to teach the subject matter they are later assigned (Fraser, 2007). Turnover rates are higher than ever due to these failures in the system (Darling-Hammond, 2003), and a lack of teachers in areas that need them most have led to almost impromptu means of recovering some ground (i.e., Teach for America; Fraser, 2007). All such failures speak to the same core issue: a disconnect between legislative requirements and reality. As of 2014, only Alaska, Arizona, California, Florida, New York, Pennsylvania, and Massachusetts required ESL-specific preservice university coursework (Wheeler, 2014); the Education Commission of the States (ECS; 2014) also published data showing that many states have no additional ESOL standards aside from the general federal mandate that some form of in-service professional development (PD) be offered to teachers with ELs in their classes.

The Case in Florida: ESOL Infusion and Legislative Requirements

The state of Florida contains 67 school districts and over twice the U.S. state average of number of schools at 4,427; its total number of students – 2,792,324 – also greatly exceeds the state average of 986,804 (NCES, 2016). Most notable for the purposes of this study, however, are its large populations of Hispanic students (880,892), over three times more than the state

average, and EL students (268,189), almost three times the state average (NCES, 2016). Florida is a large state both geographically and in terms of its population, making governance and standardization of procedures a difficult challenge. In 1990, the Consent Decree, passed due to the efforts of advocacy groups campaigning for the rights of ESOL students, required in-service professional development for teachers in order to equip them with strategies to better instruct the growing numbers of ELs in their classes (Nutta et al., 2012). After immediate frustrations about the additional coursework and confusion about the set parameters, it was eventually decided in 2004 that all teachers must receive an official ESOL endorsement; the requirements differ based on the subject the instructors teach (Nutta et al., 2012). Responses to these policies were, and continue to be, mixed. It is tempting for already overworked teachers to relegate ESOL-based tasked to the experts and paraprofessionals, but the collaborative instructional model advocates for the importance of sustaining efforts across all school employees (Nutta et al., 2012). The resulting infusion movement across the state of Florida, beginning in the South and gradually spreading further north (which involves adding ESOL coursework to existing university teacher training curricula) has culminated in a more concretely defined model of ESOL preparation called the One Plus Model, which is more in-depth and catered than its predecessors (Nutta et al., 2012).

EL infusion in university preservice teacher education coursework has become increasingly prevalent in institutions across the United States. It has taken a long time for policymakers and university faculty to seriously focus upon this matter, however. Despite the need for such preparation perhaps seeming obvious to an outsider, attempting to change longstanding curriculum and practice is no simple task. As has been established, in states such as Florida it has necessitated mandates pushed by advocacy agencies to incite such change, and – even then – complete adaptation of these new inclusive policies was delayed over technicalities

in syntax that did not originally overtly require a revised university curriculum (Govoni, 2011; Wheeler, 2014). It is not feasible to require all content area instructors to obtain an additional degree in ESL nor a supplemental and time-consuming certification in addition to their already required content-area coursework, so infusion (via models such as One Plus) remains the most logical method to prepare all teachers to meet the needs of ELs. Lavery, Nutta, and Youngblood (2018) found that, between two groups of teachers who had received instruction under the One Plus model in Florida (which consisted of one content-area group and one language arts group, n = 8,326 K-12 students and n = 288 teacher candidates), both groups were able to help narrow the gap between classes that consisted of both ELs and native English speakers. These are encouraging results that make evident the efficacy of catered teacher training.

As Wheeler (2014) mentions in her article, however, adopting an infusion model does not mean that there is automatically an effective university curriculum and an adequate provision of resources. At first, this sort of specialized curriculum simply did not exist; an effort at development had to be made in Florida, beginning around 1998 (Wheeler, 2014). Other states must keep this in mind. Despite how good their current teacher education program may be, even the best professors will not immediately be able to compose a comprehensive ESOL-infused syllabus nor know the relevant second language acquisition (SLA) theory to teach the content themselves. They must learn these things, and ESL experts – mentors – must help them. Curriculum must constantly be evaluated and reformed as problems arise (Nutta et al., 2012).

Many challenges persist, and a continuous attempt to limit these shortcomings should always be made. Standardization across a state, for example, frustrates those in districts with very few ELs that have nowhere to send their teacher candidates for their student teaching experience (Govoni, 2011). Slippage is another concern: when professors choose to edit the given curriculum to suit their own needs and therefore subvert the original intentions of the

syllabus design. While is it difficult to completely stop this from happening, increased supervision and accountability must always be enforced (Nutta et al., 2012).

Fostering a Supportive Environment for English Learners

One of the principal issues faced by K-12 educators is how to create a supportive and nurturing environment for English language learners in their schools (Bartolomé, 2012). Ideally, policy and practice-based implications of the proposed research would extend to the entire school community, not only to ESOL students and their teachers, in order to foster a positive environment conducive to learning. This is one of the goals of infusion models of preservice teacher training, such as the One Plus model in the state of Florida previously mentioned. The intention is to better equip future mainstream teachers with the knowledge and strategies necessary to meet the linguistic and cultural needs of the diverse ELs they will soon have in their classrooms (Nutta et al., 2012). Allen et al. (2017) further argue for the development of critical consciousness in teacher candidates that will allow them to "assess their capacity for social justice action" (p. 16). Teachers should all be advocates for their students.

Policy makers must seek to accelerate the process of establishing clear requirements and accountability measures across all universities and K-12 public schools in the United States who have still not uniformly adopted the same ESOL standards and curriculum. Furthermore, the government must work to restructure teaching jobs, increase pay, and allocate resources to underserved school districts (Darling-Hammond, 2003). Unfortunately, in lieu of these provisions not yet being a universal reality, the school environments of many ELs in the United States are sometimes negative and even hostile. Talmy (2009), for example, observed harsh and inappropriate utterances and behaviors of a high school ESL teacher in Hawaii over a two-and-a-half-year longitudinal study; the teacher, assigned the pseudonym Mr. Bradley, once abruptly

stated “Don’t be dumb like ESL students” (pp. 242-243). He occasionally cursed and often yelled. While his goal was ostensibly to show his students that they did not have to fit the “dumb” stereotype, his language choices and behavior unfortunately predicated the notion of ESL deficiency (p. 249).

Findings of Talmy’s (2009) study indicate that the mainstream/ESOL hierarchy observed at the school was often enforced in Mr. Bradley’s classroom by long-term, “local” ESL students (speakers of Hawaiian Pidgin who were also seen as more of the “us” than as the “other”) against foreign newcomer students who were often derisively referred to as “FOBs,” or “fresh off the boats” (p. 238), and certainly by Mr. Bradley himself. The findings are extensive and research-heavy, but generally revolve around the notions already described – linguistic prejudice had established “status asymmetry” between ESL and mainstream students that was present in classroom relations between teachers and students as well as between less-experienced and more-experienced ESL students (p. 248). Mr. Bradley’s “means to an end” tactic became abusive (Crookes, as cited in Talmy, 2009, p. 249) and only strengthened the negative stigma attached to ELs.

Such a phenomenon, though Talmy (2009) was a more recent example, aligns with the “deficit approach” to teaching and learning common in the 1960s and 1970s (Paris, 2012). This approach places the languages and cultures of marginalized communities as “deficiencies to be overcome in learning the demanded and legitimized dominant language, literacy, and cultural ways of schooling,” which fall within White, middle-class norms (Paris, 2012, p. 93). “Simply put, the goal of deficit approaches was to eradicate the linguistic, literate, and cultural practices many students of color brought from their homes and communities and to replace them with what were viewed as superior practices” (Paris, 2012, p. 93). The CRP theories and research of Ladson-Billings (1990, 1994, 1995) and Gay (2000, 2002), among others, were critical in the

decline of this prevailing perspective, though this is not to say that its remnants do not still exist (Paris, 2012). Families of students can also suffer from such damaging perspectives: one three-year ethnographic study, which consisted of interviews with school administrators and analyses of official documents, found that there was no mention of students' first language and cultures, nor were parents ever informed about ESOL-related policies (Salazar, 2008).

Isolated case studies cannot be generalized to the entire nation. Rather, they serve as a reminder that such negativity does exist in certain locations within schools in the United States. Not all research findings have been negative, and instead present positive examples and models of potentially replicable practices. Choi (2013), for example, discusses how a social studies teacher given the pseudonym "Mr. Moon," a Korean immigrant who worked at an alternative public school intended for newcomer ELs, was able to create a curriculum that was specifically deemed culturally relevant pedagogy; it was greatly appreciated by his students, all of whom were also successful in the course. The stories of immigrants are marginalized, particularly in social studies, and international students see little of themselves represented in the material they are expected to acquire (Choi, 2013). Though Mr. Moon had the exceptional benefit of teaching in an alternative newcomer school dedicated entirely to ELs and exempt from state-mandated assessments, the model he proposed of planning for ESOL-specific needs could be adapted in mainstream classes of all subjects, as Hademenos, Heires, & Young (2004) made evident in their study. A lower-level high school ESOL class of 27 students, half of whom had never taken a science class, was integrated with a class of advanced physics students who served as peer mentors. In this way, they were viewed as capable of learning complex theories and topics, which increased their confidence level and performance.

This could be seen as a step toward the idyllic community model presented by Sylvan (2013), who introduced a school at which "all teachers simultaneously support both language and

content, and students are taught in groups of heterogeneous English proficiency levels" (p. 19). Rather than view the influx of newcomer ELs as a burden, this school in New York decided to embrace the new cultures and languages that had been introduced by these new students and proudly label themselves as "international" to remove the negative stigma (also previously described by Talmy, 2009) of immigration. Though English was the lingua franca at that institution, students were permitted and encouraged to interact with each other in their native languages as well. The entire school assumed this approach, integrating it into every classroom setting.

Teacher Attitudes and Professional Development

The ever-present pressure of meeting the testing requirement is a barrier for schools when it comes to creating a supportive environment for newcomer ELs, as they may feel that there is insufficient time to focus on anything other than matters directly related to assessment. However, the widespread negative attitudes of teachers may remain the biggest hurdle to overcome. As such, teacher professional development is necessary to circumvent such harmful perspectives. Garza and Crawford (2005) found in their critical ethnographic analysis of an elementary school in the United States that there was a disconnect between the school's official discourse regarding respect for diversity and equity; an assimilationist agenda was behind instructional practices (p. 607). What the schools were saying, then, did not match what they were doing. This finding is supported by additional studies, such as the one conducted by Olivos and Ochoa (2008): they concluded that this type of official school discourse and policy was comprised of "false promises to low-income ethnically and linguistically diverse communities and a system that actively structures educational inequality along racial and class lines" (p. 290). An especially recent 2019 report by Education Week shared the results uncovered by a Washington-based think tank, New

America, as they explored state teaching standards and training practices across the country. They found that only three states expressly require teachers to learn about the potential impact of bias and institutional racism on students and learning, and only about half of all states encourage teacher self-reflection of their own potential biases (Mitchell, 2019). For the purposes of this study, which similarly looked at provisions within official policy, such self-reflective practices were identified as an inclusion criterion for the first a priori research-based code (*Cultural Education and Responsiveness Included within Teacher Professional Development*): "Looking at one's own attitudes and practices" (Montgomery, 2001). "While all states already incorporate some aspects of culturally responsive teaching within their professional teaching standards, most fail to provide a description of the practice that is clear or comprehensive enough to support teachers in developing and strengthening those skills," the report further elaborates (Mitchell, 2019, para. 5). Allen et al. (2017) cite similar challenges that come when teacher education programs attempt to incorporate training relevant to multiculturalism. One such challenge is the simple fact that requiring a teacher or teacher candidate to complete a certain number of hours with diverse learners does not guarantee a genuine commitment to learning how to best instruct them. Teachers may instead simply complete the bare minimum and move on to teach more "desirable" groups of learners (Weilbacher, as cited in Allen et al., 2017, p. 8).

It is clear, then, that professional development (PD) is needed before any improvements can be made to educational practices; teachers must learn to appreciate and understand their students. "When teachers are given the responsibility of teaching students from CLD [culturally and linguistically diverse] backgrounds, their attitudes must reflect an appreciation of the cultural, linguistic, and social characteristics of each of their students" (Sparks, as cited in Brown, 2007, p. 58). However, these attitudes do not spontaneously occur without effort on the part of the instructor and those tasked with training them. Brown (2007) cites the title of a

pedagogical methods book by Gary Howard, published in 1999: "We Can't Teach What We Don't Know" (p. 58) – teachers, even the best ones, must be advised regarding how to best meet the needs of their students. However, as many teachers have already discovered and as researchers have highlighted, in-service PD has proven woefully inadequate at universally and reliably delivering practical help to instructors (Lucas & Grinberg, 2008). The way in which such programs are offered is "notoriously disjointed and disconnected from teachers' practice, and still too often 'delivered' in infrequent workshops with little or no follow-up" (Borko, as cited in Lucas & Grinberg, 2008, p. 11). This study did not propose a means of bettering common PD approaches, but it is vital to note that establishing PD requirements does not necessarily lead to the successful conveyance of key concepts and the improvement of educational outcomes.

Lilia Bartolomé (2012) claims current educational research suggests that prospective teachers hold unconscious beliefs that are often damaging to many students (p. 509). Gomez, Strage, Knutson-Miller, and Garcia-Nevarez (2009) advocate for early field experiences that may help to shake these beliefs and attitudes, and Jurchan and Morano (2010) and Wong (2008) both cite positive results from pre-service EL tutoring and mentoring opportunities for teachers of all content areas. "By not having the proper knowledge, skills, and dispositions to teach culturally responsive ways and act as cultural brokers…. these teachers might be denying their students significant educational opportunities" (Wong, 2008, p. 31). However, as Brown (2007) highlights, "too many" teachers are unprepared to teach students from diverse cultural backgrounds, and it is difficult to instill within them both the requisite knowledge as well as a sense of both understanding and appreciation of practices and behaviors that may differ dramatically from their own (p. 58).

Theoretical Perspectives

Culturally Responsive Practice

This study analyzed school district policies and practices within the over-arching theoretical perspective of CRP; the word "practice" here replaces the commonly-utilized term of "pedagogy" in order to account for institutional-level procedures that surpass the classroom-level pedagogical approaches of one teacher. One of the seminal researchers of CRP, Gay (2000, 2002), argues that changes in instructional practices that seek to acknowledge, respect, and respond to the unique cultural perspectives of students will subsequently lead to an improvement in ESOL student performance; it just takes effort and genuine care and consideration on the part of the teacher and their institution. Gay's work (2000, 2002) expanded upon the groundbreaking publications of Ladson-Billings (1990, 1994, 1995), who had focused her research on the needs of African-American students within underserved schools in the United States. The term *culture*, after all, applies to more than foreign languages and traditions from overseas. There are marginalized populations native to the United States whose discrete cultural practices, ways of speaking, and marginalized status negatively impact their treatment within mainstream schools. For instance, Heath's (1989) "Ways with Words: Language, Life, and Work in Community Classrooms" documents case studies of students living in poverty-stricken communities in the North Carolina Piedmont in the 1980s whose behaviors and unique needs were misunderstood by their teachers. "Thus, the goal of education becomes how to 'fit' students constructed as the 'other' by virtue of their race, ethnicity, language, or social class into a hierarchical structure that is defined as a *meritocracy*," Ladson-Billings (1995) noted; "However, it is unclear how these conceptions do more than reproduce the current inequalities" (p. 467).

The goal of CRP is not, then, to assist students in assimilating to a dominant culture,

devaluing their home cultures in the process, but rather to understand the characteristics and contributions of different ethnic groups (Brown, 2007). "Culturally responsive teachers believe that culture deeply influences the way children learn" (Brown, 2007, p. 58); as a result, they make an effort to learn about the cultures of their students. Richards, Brown, and Forde (2007) broaden the pedagogical frame of reference to include the overall organization of the school (consisting of the administrative structure and use of physical space in the design and arrangement of classrooms), services and practices of the institution, and community involvement. Alternately, the term *culturally sustaining pedagogy* has been employed by some researchers (i.e., Paris, 2012) to explicitly support the preservation and continuation of cultural and multilingual education rather than mere acknowledgement of a student's home culture with the overriding goal of assimilation to the host culture. There exist other theories, however, that serve to elaborate upon the intrinsic need for culturally responsive practices when teaching students from linguistically, ethnically, and racially diverse backgrounds.

Critical Race Theory

Though the past couple of decades have seen increased scholarship in these areas, Kubota and Lin (2009) warn that the topic of race in general "has not yet earned significant visibility in second language scholarship, unlike other related fields such as sociology, anthropology, education, and composition studies" (p. 1). Reasons for this possible lack of research are often identified as related to the negative stigma attached to the word "race," as it is inextricably tied to racism, an area that most fear treading (Kubota & Lin, 2006, 2009). Before actually looking at how race can and has impacted teachers and learners of a second language, current thought on the subject – which has proven itself inherently problematic – needs to be understood. Scholarly attentions have recently been concentrated on unequal power relations in society and the

importance of taking a critical approach to pedagogy and discourse analysis (most famously by Bonny Norton, 2000, in her book "Identity in Language Learning"), and the vital topic of identity formation is certainly connected to race (Faez, 2012).

The clearest and most glaring issue with this controversial topic, however, is that race is essentially an ever-evolving construct formed by social discourse and not a biologically significant nor strict category; race has even been said to reflect the notion of an "imagined community" in that it only exists in human minds (Anderson, as cited in Kubota & Lin, 2009, p.3). In fact, 99.9% of human genes are shared by all (Kubota & Lin, 2009), so innate characteristic differences among racial groups are not in any way quantifiable or significant. To avoid the minefield of race and attempt to look more at the crux of the matter – which are differences in culture that conflict with each other in societal interactions between members of different communities – the term *ethnicity* frequently replaces the term *race* as a "politically correct code word" (Miles & Brown, as cited in Kubota & Lin, 2009, p. 3) that also looks at sociocultural characteristics.

Critical Race Theory (CRT) takes a magnifying glass to society in order to analyze how race, legal practices, and negotiations of power interact (Kubota & Lin, 2009). Another prevalent perspective comes from Critical White Studies (CWS), which asserts whiteness to be an "invisible and unmarked norm against which all Others are racially and culturally defined, marked, and made inferior" (Kubota & Lin, 2009, p. 10). Ligget (2014) identified three major aspects of CRT that would prove most significant to our understanding of the relationship between language and race for Teaching English to speakers of other languages (TESOL). "The first aspect is to explore the notion of linguicism as an ordinary, permanent fixture in society… This would entail examining how ELLs routinely encounter discrimination based on language proficiency and accent in their school community and beyond" (Liggett, 2014, p. 118)

(*Linguicism* here refers to discrimination based on language rather than by race).

Liggett (2014) then identified colonialism as the second major aspect to consider and advised including teacher-training curricula on this topic in relation to language and education policy. To explain further, a postcolonial approach argues that binary oppositions were paramount in colonial discourse, and we have not yet shaken that notion of the Self and the Other; unfortunately, the Other is commonly positioned as incompetent or deficient to the Self (Faez, 2012; Motha, 2006). Agency, which can be defined as a person's ability to act upon will or make decisions which impact his or her life – often described as an ability to move, and literally "position" oneself socially (Norton, 2013) – can be viewed as hindered by lingering colonial attitudes that lead to discrimination. Members of a community who are so positioned as inferior may not even be afforded the right to engage in conversation with those on a higher level of the social hierarchy, nor are they able to re-position themselves within that hierarchy (Faez, 2012).

Mackie (2003) identified disturbingly ubiquitous postcolonial ideals in her personal recounting of her experiences as an ESOL teacher in a Canadian school, reporting the "continued postcolonial identification of ESL teachers as 'saviors' and 'correctors' and of ESL students as 'barbaric' and 'misbehaving' students" (Mackie, 2003, p. 33). Similarly, Motha (2006), in her qualitative study of four first-year ESOL teachers in U.S. public schools, summarized three major findings present within each school, which she deemed "colonial manifestations" (Motha, 2006, p. 77); an inextricable tie between race and language is evident in these "manifestations," as race itself never seems to stand alone in the field of SLA. The first one she identified was that English was considered supreme over other languages (Motha, 2006) – of course, by displacing mother tongues, the students' ethnicity was also devalued, leading to a perhaps unintentional (though still real) sense of negativity toward those who possessed that ethnicity, which included

their perceived race, spoken language, and cultural behaviors.

The second "manifestation" she identified as present within all four schools was "an investment in keeping Self and Other dichotomous and separate, with Self superior to Other, reflected in a construction of the school categories of ESOL as Other, inferior, and deficit and of non-ESOL as the unmarked standard" (Motha, 2006, p. 78), which aligns with Ligget's (2014) argument. ELs, then, were positioned as inferior to non-ELs due to the still-existing postcolonial desire for strict hierarchical categories. It is this finding under which many of the distressing observations Motha recorded can be framed. One of the interviewed teachers shared that mainstream students would pause at the doorway of her ESOL classroom and yell "You can't speak English" and "play with the light switch at the door" about once a week (Motha, 2006, p. 82). ESOL students were ashamed and tried to hide their status, and rather than their bi/multilingualism being seen as an admirable trait, it was in all cases viewed as deficient (Motha, 2006); these findings recall the deficit theory (Paris, 2012) as well as echo Talmy's (2009) observations that the term "ESOL" carried with it connotations of "disrespect, pragmatic incompetence, and moral and intellectual impairment" at the particular school he studied (p. 236). Though the students needed ESOL support, "the social stigma of receiving ESOL services was so great that it superseded their language learning needs" (Motha, 2006, p. 83) – perhaps *linguicism*, rather than *racism*, would be a better descriptor of such an oppressive stigma.

Liggett's (2014) third and final major aspect regarding CRT's influence on TESOL was to advocate for narrative and storytelling within the classroom to "convey experiences of oppression" (p. 118). "In this way, these individual accounts add the necessary contextual contours that Ladson-Billings (1998) points to as necessary components to deconstructing positivist perspectives" (p. 118). Doing so, in other words, may decrease researcher bias and inherent influence on their observations.

Identity Formation

An analytic focus on the concept of conscious self-fashioning can provide a glimpse into the hierarchies that may exist within a larger community of practice (CoP; Wenger, 1998). In the case of K-12 education, the school would serve as the largest CoP; individual classrooms, the spaces outside of class, and student-formed culture-sharing groups themselves are smaller CoPs. Students, then, are members of many CoPs at once, each of which possess unique characteristics and may be positioned at various levels of the social hierarchy. ELs in particular are also navigating the complicated process of adapting to a foreign society that may marginalize, stereotype, and discriminate against them.

Bonny Norton (2000; the updated version from 2013 is here referenced) produced what is perhaps the most influential piece of qualitative literature in the field of sociolinguistics with her book "Identity and Language Learning." It documents an extensive longitudinal study of five immigrant women living in Ontario, all of whom were attempting to learn English while navigating their daily lives in a foreign environment. Multiple interviews with all women were conducted over the course of two years, rich data supplemented with personal journal entries kept by each participant. The notion of *imagined* communities (originally coined by Anderson, 1991; elaborated upon by Wenger, 1998; Norton, 2013) was discussed as an influential concept wherein students consciously develop their own sense of self. They exercise available agency – or power – to become part of idealized or hypothetical groups, such as the target language "communities" of valued native speakers (Norton, 2013). In addition to imagined communities, which can motivate learners to distance themselves from characteristics possibly marginalized in the larger society in order to reconstruct their sense of selves, the concepts of investment and identity are stressed as contributing factors to a foreign student's language learning experience.

Investment is described as combining theories of motivation and agency (Norton, 2013, p. 50); students may be highly motivated to learn a language but not invested in, or even excluded from, their surrounding CoPs, which certainly impedes their language acquisition and dampens their experience.

The story of Mai, a young woman from Vietnam and one of Norton's (2013) five participants, evidences the fact that motivation does not always equal investment. When it does not, learners may exercise their agency to remove themselves from that particular CoP. Though Mai's well-intentioned ESL instructor had decided to have each student give lengthy presentations about their home countries, Mai felt as if she were learning nothing about her desired *imagined* community of English speakers (imagined in the sense that its members were not explicitly known); she was not learning what she wanted to learn, and so she silently withdrew from the class (p. 180). Liggett's (2014) third aspect of CRT, then – narrative storytelling – had unexpected negative consequences in this case. Mai also demonstrated similar agency and conscious self-fashioning when she refused to study and practice Italian with her immigrant coworkers at a garment factory. Though it would have allowed her access into a social and potentially friendly CoP, it was not the sort of CoP of which she wanted to be a member nor the language she wished to practice (p. 121). Practitioners must here understand the notion of resistance, which Mai can be said to have demonstrated. When advocating for culturally responsive practices within an elementary school, parents rather than students could serve as such a figure of resistance, as they may wish for their children to become fully immersed and accepted into the dominant American culture, especially as it pertains to English usage. This is important for practitioners to understand as a possibility, though resistance tends to be in the reverse direction of refusing to adapt and assimilate (Pavlenko & Lantolf, 2000). Arguing the cognitive benefits of bilingualism (Cummins, 1979, 2011) as well as advocating for the

importance of the home culture(s) of the parents and their children may help to remediate some of these concerns.

In their qualitative document-based analysis, Pavlenko and Lantolf (2000) examine nine published biographies of immigrants who moved to Western countries from Slavic locations in order to identify themes related to identity and agency. Their study, then, is quite different from Norton's approach, but similar conclusions emerged. "It is ultimately through their own intentions and agency that people decide to undergo or not undergo the frequently agonizing process of linguistic, cultural, and personal transformation" that learning a second language overseas entails, they argue (p. 171). The entire notion of becoming an overseas learner and adapting to a new place, then, can theoretically be resisted. For those who do "undergo" the process, talk of assimilation and integration into a new culture implies an erasure of their identity that learners may fight in order to preserve their own language and culture – especially parents of those children who wish to pass on such essential knowledge (Pavleno & Lantolf, 2000; Norton, 2013). Identity is not only self-fashioned but often imposed on students without their consent by institutions. They are immediately labeled upon arrival. McKay and Wong (1996), in a two-year ethnographic study (based on observations, writing samples, and informal interviews) of newcomer Chinese speaking students from seventh to eighth grade, indicated that the diverse individual needs and goals of each of them necessitated viewing ELs as complex beings actively constructing unique identities. They do not fit into a neat category, level, or group.

There is a clear competing dichotomy when it comes to resistance, agency, and the construction of identity. It seems learners may choose to associate with those like them to resist integration into the dominant group, but they may also see the dominant group as a valued imagined community in which they would like to gain membership. Innumerable factors that have yet to be fully explored must be considered when investigating such choices. In any case,

learners are members of diverse, heterogeneous CoPs that can change drastically from hour to hour, class to class, and day to day (McKay & Wong, 1996; Norton, 2013). Morita (2004), in her ethnographic multiple case study of Japanese students at a Canadian university, emphasized the fact that classroom context alone varied significantly for and between each learner, drastically impacting their classroom socialization and investment. Teachers, then, must be conscious of the CoP they are creating within their classrooms and ensure that it is fostering learning and positive socialization experiences.

Policy and Practice

Pre-Service Training and Curricular Implications

In an exploratory study of pre-service teacher education textbooks, Watson, Miller, Driver, Rutledge, and McAllister (2005) discovered that scant information was included within the twenty-five most commonly-used texts that would prove useful to teachers when it came to the instruction of ELs; sometimes the topic was not introduced at all. Though this study is slightly outdated, there are certainly thousands of currently practicing teachers in the United States with ELs in their classes who graduated before 2005. Taking the shortcomings of in-service PD (Lucas & Grinberg, 2008) into account as well as the inconsistent state-state ESOL-related legislative regulations (i.e., Wheeler, 2014; ECS, 2014), it is not unreasonable to conclude that ESOL training is lacking nationwide. Further considering the recent findings of New America regarding the nationwide lack of culturally responsive teaching techniques, there are still many hurdles left to overcome (Allen et al., 2017; Mitchell, 2019).

While a standardized ESOL curriculum would prove challenging with such a diverse body of learners, it would perhaps be possible to require certain approaches to be taken. The

Newcomer Booklet proposed by Marshall and DeCapua (2010) would be one possible example. It allows students to share information with their teacher that could then be used to influence instruction for the remainder of their course as well as for subsequent newcomer students. The kind of mainstream classroom integration previously seen in the Hademenos, Heires, and Young study (2004) would also be a good place to start at any school unable to enact a complete curricular overhaul.

Linguistic Precursors to Academic Success

Cummins (1979) developed the Linguistic Interdependence Hypothesis, which consists of both the Developmental Interdependence Hypothesis and the Threshold Hypothesis. The Developmental Interdependence Hypothesis states that the level of proficiency in a student's L2 is correlated to the level of proficiency already garnered in the L1. Therefore, if literacy skills are lacking in a student's home language (as is often the case for very young students and for those with interrupted educational backgrounds), it will be difficult for that student to acquire literacy in the L2. Fostering growth in a first language directly supports growth in a second language. Swain, Lapkin, and Bark (as cited in Cummins, 1979) showed that reading scores between the two languages of bilingual students are highly correlated – all immigrant parents should, therefore, continue to use their home languages and practice literacy skills with their children, and this is not something that should be discouraged by teachers. Encouraging home use of the L1 is both culturally responsive and affirming as well as beneficial for the cognitive growth of ELs. Fear of the L1 negatively influencing the L2 should instead be converted into concern on the part of both teachers and parents that a lack of development in the L1 may actually slow progress in the L2. The Threshold Hypothesis further claims that there is a minimum level of

competency in both the L1 and the L2 in order for learners to fully benefit from the cognitive boost that being bilingual brings with it (Cummins, 1979).

Additionally, Hébert (as cited in Cummins, 1979) warned that not only does continuing to acknowledge and value a learner's L1 not have any negative effect upon academic success in an L2 but that actively denigrating and devaluing a student's first language is akin to diminishing their culture and identity. Doing so will negatively affect their motivation (integrative motivation, or the desire to become part of the new society – Gardner & Lambert, 1972) as well as investment (Norton, 2013) within their new social environment(s), therefore also negatively affecting their academic progress in the target language. Such resistance can lead to sociolinguistic fossilization of errors and the stagnation of progress (Schumann, 1978, 1986). It is evident from looking at majority-language students who study a foreign language in school that their performance is only boosted in their native language (Hébert, as cited in Cummins, 1979); the opposite relationship is never seen. We must treat immigrant language-minority students the same way in which we treat students studying outside foreign languages. Both linguistic systems carry value and importance.

Specialized Programs and Literacy Interventions

Early identification of students struggling to read and subsequent interventional measures have proven effective for L1 students, but little is known about whether L2 literacy development parallels L1 development for ESOL students (Lyon et al., as cited in Leseaux & Siegel, 2003). An investigation into this matter was conducted by Leseaux and Siegel (2003) in their study, who begin by citing previous research supporting the idea that the most important predictive factor of later reading success in L1 students is phonological awareness (Share, Jorn, Maclean, & Matthews, as cited in Leseaux & Siegel, 2003). There would be no reason to believe the same is

not true for L2 children, particularly younger newcomer students who have not yet developed literacy in their first languages. In kindergarten and first grade, children are learning academic material for the first time alongside their peers. Additional influential factors on literacy development include the specific program, the particular means of instruction, and linguistic characteristics of the L1 and its similarity to the L2 (Leseaux & Siegel, 2003).

It is reasonable to conclude that the personality of the instructor and the classroom environment have an early significant effect on SLA, as well that attention to a student's L1 and understanding of their personal schemas and linguistic competencies prior to entering the American school system is vital. Lesaux and Siegel (2003) cited multiple studies which found that ESOL students generally have poorer syntactic awareness than their peers (daFontoura & Siegel, 1995; Geva, Yaghoub-Zadeh, & Schuster, 2000; as cited in Leseaux & Siegel, 2003), which could serve as justification for early literacy intervention. Without specialized help, ESOL students are at risk of failure. After such a program was implemented to all kindergarteners in a Canadian school district in Leseaux's and Siegel's (2003) study, struggling learners of both L1 and L2 backgrounds significantly improved their performance on literacy-based tasks by the second grade. ESOL students, in many cases, even surpassed their native-speaking classmates.

The success of this early interventional reading program was attributed in large part to the increased metalinguistic awareness that being bilingual brings with it. Indeed, while ESOL children certainly begin at a disadvantage, bilingual individuals have a long-term advantage when it comes to cognitive development (Cummins, 1979; Bialystock, as cited in Leseaux & Siegel, 2003). If we can witness success with bilingual education in this more privileged setting, when language-majority children are never taught that their L1 is inferior, then sociocultural factors must also play a large role in the successful development of literacy skills. Cummins (2011) elaborates on these sociocultural implications, as it has been made clear that the often-

perceived negative relationship between the use of the L1 at home and low L2 achievement in school has been falsely concluded by studies that initially failed to account for the additional variables of low socioeconomic status and other important background variables (Cummins, 2011). The linguistic and cultural backgrounds as well as the home lives of ESOL students are aspects that teachers must fully understand in order to effectively meet their needs.

Testing Practice and a Call for Reform

In mainstream classes, teachers are often forced to "teach to the test" to meet the national content-based standards of state-dependent additional requirements. The widespread assumption many of these teachers make that English is required for successful content-area learning is a misconception (Franquiz & Salinas, 2013, p. 339). ELs are capable of learning complex content, yet this concept is not generally given credence. Part of the problem also lies with an often inaccessible, ethnocentric curriculum. Franquiz and Salinas (2013) discussed a social studies teacher of newcomer high school EL students: two data sets of classroom observational data were compared, the first of which looked at the activities and content conducted after state-level exams had been administered in 2010 and the second of which looked at the same kind of data during the spring of 2012, before the administration of these exams. While technicalities allowed the instructor to justify teaching a bit off-curriculum after the standardized test, she was unable to do so before the exam was given and strictly adhered to the curriculum due to lack of time and need to cover material which was not especially relevant to the students. In other words, a standardized, culturally irrelevant curriculum, especially to ELs, imposed limits on the ability of an instructor to more effectively reach and engage her students. When learners are disconnected from class, they fail to practice and develop academic literacy skills, as all content-area tasks integrate reading and writing into course expectations (Franquiz & Salinas, 2013).

Before students are granted the ability to enter such mainstream classes, however, they are required to be screened and appropriately placed into ESOL, an entirely different kind of testing that also proves itself inherently problematic. Bailey and Carroll (2015) took a comprehensive look at the matter in their exploratory assessment, ultimately warning that a major issue lies with decision-makers who bring bias to data analysis; there has also been a clear shift from assessing development to assessing proficiency, which does not consider the complex learning, socialization, and acculturation process nor the long and complex task of acquiring academic literacy skills (Bailey & Carroll, 2015). Ragan and Lesaux (2006) had previously identified the problem with placement and exit procedures differing widely from state to state and the generally inconsistent practices related to testing nationwide. Bailey and Carroll (2015) share this concern, and their conclusion about ESOL testing practice in the United States is quite dire: "The system needs improvements at every level" (p. 39). The Alaska Standards for Culturally Responsive Schools (n.d.), a policy meant to guide the practices of schools that serve majority Native American populations, advise that multiple methods of assessment should be utilized when determining the level and needs of all students; measurements of social skills and adaptation, comfort and confidence when speaking, and other such informal assessments can paint a more complete picture of student ability (Alaska Standards, n.d.)

Furthermore, Wolf and Faulkner-Bond (2016) explain how English Language Proficiency (ELP) assessments are considered the most important criterion to determine the proficiency level of a student and preparedness to exit ESOL. Funding is allocated to schools based on the percentage of ELs who are cited as having achieved growth/proficiency on the state Annual Measurable Objectives (AMOs). These tests, then, are vitally important, but they may not be valid. The study takes an interesting look at the type of language being tested and how it compared to social language skills and found a statistically significant correlation between BICS

(Cummins, 1979) and content-level success. Perhaps socially and culturally relevant language is more of an indicator of content success than mastery of CALP (Cummins, 1979), which could be disproportionately emphasized in ELP assessments – particularly at early grade levels when students have not yet been able to develop these competencies (Wolf & Faulkner-Bond, 2016). ELP tests should consist of a better balance of different literacy-based skills in order to more accurately assess student progress (Wolf & Faulkner-Bond, 2016; Alaska Standards, n.d.).

Summary

As has been made evident by extant research as well as has been highlighted by prevailing theories in SLA such as culturally responsive practice (CRP; Brown, 2007; Gay, 2000, 2002; Ladson-Billings, 1990, 1994, 1995; Richards et al., 2007), Critical Race Theory (CRT; Faez, 2012; Kubota & Lin, 2006, 2009; Liggett, 2014), and the notions of identity formation and belonging to multiple communities of practice (CoPs; Norton, 2013; Pavlenko & Lantolf, 2000; Wenger, 1998), a student's surrounding environment has a great impact their her ability to learn (Garza & Crawford, 2005; Mackie, 2003; Motha, 2006; Olivos & Ochoa, 2008; Salazar, 2008; Talmy, 2009). Valuing the home languages of students and their cultures is recommended when developing pedagogical techniques and policies meant to suit the unique needs of ELs and other learners from diverse backgrounds. Unfortunately, a lack of consistency nationwide, which, in some states, even means no additional provisions for ESOL-related teacher training (Wheeler, 2014; ECS, 2014), as well as commonly inadequate professional development (Allen et al., 2017; Lucas & Grinberg, 2008; Mitchell, 2019) has created a largely unprepared instructor workforce (Bartolomé, 2012; Fraser, 2007; Samson & Collins, 2012; Watson, Miller, Driver, Rutledge, & McAllister, 2005). Additional issues arise when considering testing practices (Bailey & Carroll, 2015; Franquiz & Salinas, 2013; Ragan & Lesaux, 2006; Wolf & Faulkner-

Bond, 2016) and the lack of focused research on the impacts of catered literacy programs and early interventions for L2 learners (Leseaux & Siegel, 2003). Though Florida is one of the few states leading the way in ESOL teacher training and professional development (Nutta et al., 2012; Wheeler, 2014; ECS, 2014), critically examining its district policies and practices for instances of CRP could be beneficial in establishing both the potential successes and weaknesses of its recent reforms.

CHAPTER 3
METHODOLOGY

Introduction

Florida is one of the few states with explicit ESOL-related regulations for preservice teacher training in the United States (ECS, 2014; Wheeler, 2014). The 1990 Consent Decree was passed in an effort to fight for the civil rights of ELs enrolled in ESOL programs within K-12 public schools and seeks to ensure both educational equity as well as educational quality as delivered by competent and well-trained teachers (FLDOE, 2018). The Florida Department of Education requires all 67 of Florida's school districts to complete an "ELL Plan," effectively ESOL-based policy (Appendix A; summarized in Table 4), to outline the specific provisions they have agreed upon in order to satisfy the demands of the Consent Decree (FLDOE, 2018). While each district's provisions are not the same – making them open for comparison – they are required to answer the same questions. Table 4 condenses the contents of the provided 2016-2019 template, also included in its entirety within Appendix A. Topics and sub-questions have been paraphrased.

With the parameters of the required district policies in mind, as well as the knowledge that EL student populations are rapidly growing in number in Florida (NCES, 2019; Nutta et al., 2012) and teachers are frequently unprepared to meet their cultural and linguistic needs (i.e., Bartolomé, 2012; Mitchell, 2019; Samson & Collins, 2012; Watson Miller, Driver, Rutledge & McAllister, 2005), the following two research questions guided the conduction of the study:

1. In what ways, and to what extent, do ESOL policies in twelve criterion-sampled Florida school districts address culturally responsive best practices as described in the literature? (Phase I)
2. In a smaller purposive sample of two elementary schools within one of these

Florida school districts, in what ways, and to what extent, do the observed and reported practices of each reflect fidelity of policy implementation? (Phase II)

a. What kind of procedural similarities exist between these two selected schools?

b. What kinds of procedural differences exist between these two selected schools?

Table 4

Template Contents of 2016-2019 Florida District ELL Plan

Section	Topic(s)	Sub-Questions
1	Identification Enrollment Procedures and Administration of the Home Language Survey (HLS)	Describe the registration procedures: How do they compare to non-ELs? In what languages is the HLS translated? How are parents assisted who do not speak English? How are immigrant students identified?
2	English Language Proficiency Assessment Listening and Speaking Proficiency Assessment Reading and Writing Proficiency Assessment EL Committee	Who is responsible for administering the ELP assessment? (Checklist of options) List the Listening and Speaking assessment(s) used and the procedures followed to determine if a K-12 student is an EL. Describe the procedures to ensure that the Listening and Speaking assessment(s) are administered within 20 days of enrollment. List the Reading and Writing assessment(s) used and the procedures to determine if a student is an EL from grades 3-12. Describe the procedures used when the EL Committee makes a placement decision. What documentation is used?

Section	Topic(s)	Sub-Questions
3	Programmatic Assessment Grade and course placement procedures – grades 9-12 Re-evaluation of ELs that previously withdrew from the school EL Student Plan Development	Describe the procedures that have been implemented for determining prior academic experience of ELs with limited educational backgrounds. Explain the process for awarding credit to students transferring from other countries. Who is responsible for evaluating foreign transcripts? How are they trained? Specify the length of time after a student withdraws and before they re-enroll after which a new ELP assessment must be administered. Describe the procedures for developing the student EL plan. Include who makes the plan, when it is updated, and the elements included within the plan.
4	Comprehensive Program Requirements and Student Instruction Instructional Models Student Progression	In addition to required ESOL strategies by teachers who teach ELs, what model(s) or approach(es) are used to ensure comprehensible instruction? (Checklist of options) Describe how the schools will be monitored to ensure that the instructional models are implemented with fidelity. Describe how the instruction provided to ELs is verified to be equal in amount, sequence, quality, and scope to non-ELs. How are the positive effects of instructional approaches determined? How are ELs ensured equal access to all programs, services, and facilities? Describe the method(s) used to document ESOL instructional strategies and how this is monitored. How is comprehensible instruction verified? What safeguards are in place to ensure that ELs are being provided equal access?

Section	Topic(s)	Sub-Questions
4	Comprehensive Program Requirements and Student Instruction (cont'd) Instructional Models (cont'd) Student Progression (cont'd)	Who is responsible for this? What progress monitoring tools are being used? (Checklist of options) Have the standards for promotion, placement, and retention of ELs been incorporated into the Student Progression Plan?
5	Statewide Assessment	Describe the process to ensure that ELs participate in statewide assessment programs (must include WIDA ACCESS). How are staff trained to administer these assessments? Who is responsible for ensuring that accommodations are provided? How are parents notified of assessments and testing accommodations? How does the district ensure that parents understand policies, mandates, and student outcomes?
6	English Language Proficiency Annual Assessment	Describe the procedures to determine if an EL is ready to exit the ESOL program. Include procedures. Who is responsible for conducting the exit assessments? (Checklist of options) When is an EL Committee involved in making exit decisions? What criteria are used by the Committee to determine language and academic proficiency?
7	Monitoring Procedures Compliance of ELL Plan and Student Performance	Describe the procedures if an EL meets exit qualifications in the middle of a grading period. During the required two-year monitoring period, who is responsible for: conducting the follow-up performance of former ELs? Updating the student plan? Reclassification of EL status in data reporting systems?

Section	Topic(s)	Sub-Questions
7	Monitoring Procedures (cont'd) Compliance of ELL Plan and Student Performance (cont'd)	What documentation is used to monitor student progress? (Checklist of options) What are the procedures when the EL is not on academic grade level?
8	Parent, Guardian, Student Notification and Rights	Describe the procedures used and provide a link sent to parents of ELs identified for participation in a language instruction program (Includes criteria the notice must include per the Every Student Succeeds Act) Describe procedures used by school personnel to provide assistance to parents and guardians of ELs in their home language. Describe parent outreach activities that inform parents of how they can be involved and how they can assist their children to learn English. Check the school-to-home communications that are sent to parents in a language they can understand (Checklist of options)
9	The Parent Leadership Council	What type of Parent Leadership Council (PLCs) exist? (checklist of options) If PLCs are not comprised of a majority of EL parents, explain why. How is the PLC involved with other communities? How is the PLC involved in the development of the District ELL Plan? Does the PLC approve of the District ELL Plan? If no, please provide an explanation why.
10	Personnel Training	Describe how ELA teachers of ELs who are required to receive ESOL endorsement are notified of requirements. Describe how content area teachers are notified of ESOL training requirements.

Section	Topic(s)	Sub-Questions
10	Personnel Training (cont'd)	Describe how all other instructional staff are notified of requirements. Describe how the training requirement is provided for administrators and Guidance Counselors and the tracking system that will be implemented. Describe the supplemental professional development offered. If instruction is provided in a language other than English, describe the procedures to ensure the teachers' proficiency in that language. Specify the eligibility requirements for bilingual paraprofessionals. Describe procedures for training bilingual paraprofessionals in ESOL or home language strategies. Provide an assurance letter from the district superintendent that the district is in compliance with ESOL training requirements.
11	Extension of Services Listening and Speaking Proficiency Assessment Reading and Writing Proficiency Assessment	Describe procedures used to determine extension of services. Explain the role of the EL Committee and what supporting documentation is used to determine of continued ESOL services are necessary. List the Listening and Speaking Assessment(s) and Reading and Writing Assessment(s) to determine if a student if English proficient for extension of services.

Note: Adapted from Florida Department of Education. (2015). 2016-2019 English Language Learner (ELL) Plan. Retrieved from https://web02.fldoe.org/rules/doc/6A-6.09021_464.pdf

Design of the Study

The mixed-method approach utilized by the researcher in this study (see Table 2 for all sources of data) allowed for a systematic and critical analysis of policy (Malen & Knappe, 1997; Spillane, 2005) across twelve school districts via the focusing lens of culturally responsive practice (CRP). This collective case study (CCS; Baxter & Jack, 2008; Stake, 1995) analysis was further contextualized by qualitative observational and interview data from two elementary school sites within one district, not only enabling the triangulation of data from various sources (Denzin, 1978; Hitchcock et al., 2005; Patton, 1999) but also accounting for potential variability in practice across more than one location.

Phase I involved the creation of a research-based content analysis protocol (Appendix B; Dubnick & Bardes, as cited in Malen & Knappe, 1997; Spillane, 2005) that guided the researcher through the process of identifying, recording, and tallying instances of practices that could be considered culturally responsive. Nine codes, six of which contained more detailed inclusion criteria, were culled from scholarly journal articles and extant examples of similar policies (Maykut & Morehose, as cited in Saldaña, 2009). These specifications formed the template, or content analysis protocol, to enable the qualitative research methodology of a priori coding (King, 1998; Stemler, 2001). The given parameters outlined in the 2016-2019 District ELL Plan template (Appendix A; Table 4) were considered when deciding upon a realistic scope of what each policy was likely to address, ensuring that researcher expectations were fair and not overly ambitious. Table 1 presents the nine criteria (further explicated in Appendix C) alongside justifying citations from the literature. Chapter 4 contains tables that display the frequencies with which each of the nine codes appeared within the twelve documents as well as detailed, thick-rich descriptions of observed patterns and examples.

Phase II involved the researcher visiting two individual school sites within Frederick County (pseudonym) to collect qualitative interview and observational data from each. Both sets of data were transcribed, open coded, and then axial-coded for emergent themes (Blair, 2015; Glaser & Strauss, 1967; Strauss & Corbin, 1998); these themes were then compared to one other, to the original provisions delineated by district policy, and to the ideal circumstances described by the research on CRP. Though no definitive conclusions nor an ultimate evaluation of Florida schools could be drawn from such a small sample, findings from Phase II can nonetheless serve as a sort of barometer of what may currently be happening in Florida public schools. Recorded observations and interviews – despite not being generalizable – represent the real, lived experiences of students and teachers within schools that serve hundreds of Florida's ELs.

The combination of a priori coding (Phase I) and open coding (Phase II) is beneficial in that it allows for flexibility when analyzing various types of data in order to meet the needs of the researcher (Blair, 2015). As is argued by Faherty (2010), coding processes grant a certain amount of freedom to researchers to employ them in a way that appropriately suits their unique needs. For this study, an initial framework was necessary to narrow down detailed policy documents into criteria relevant to CRP. However, the same content analysis protocol would have been unnecessarily limiting when applied to the less predictable observations and utterances recorded in the field, as it may have cut off the potential for additional themes to be discussed and reported that were unanticipated by the researcher.

Selection of Participants

Phase I

As this study was concerned with English learner populations in the state of Florida, the researcher narrowed its $N = 67$ school districts by only selecting those which enrolled at least 10% ELs from the 2015-2016 school year (as reported by NCES) for the study sample, since this was the first year the 2016-2019 District ELL Plans went into effect. This process is known as criterion sampling (Patton, 2002), and is justified in that it focuses the data collection and analysis procedures on sites and/or participants within the intended scope of the research rather than those outside of it. While all institutions that serve ELs should be conscientious of the methods they employ, it is arguably most important for schools with the largest populations ELs to do so. This necessitates that they follow effective policy, and – for the purposes of this research study – policy that is culturally responsive.

SPSS was utilized to convert the raw population data reported by the NCES into percentage form. The SPSS dataset contained all 67 districts, their total enrollment numbers, and their reported populations of ELs from 2015-2016. The compute function was employed within the program to divide the number of ELs by the total population for each district in order to obtain the percentages of ELs, which were then consulted when forming the final criterion sample of $N = 12$. While this process could have been done by hand, SPSS ensured that no human error would be made.

Phase II

The two elementary school sites, hereafter given the pseudonyms *Middletown Elementary* (Site A) and *Tuscarora Elementary* (Site B), were purposively sampled (Creswell &

Plano-Clark, 2011; Patton, 2002) as part of Frederick County's IRB process. After five potential options were selected by the researcher based on colleague recommendations, location within one of the twelve districts in the sample, and reported populations of ELs (despite all being located within a district that met the 10% criterion, this did not guarantee that individual schools would also report high enough numbers), Frederick's IRB committee reached out to principals at each of the five elementary schools to see if they would provide research consent. Initially, only one principal replied (from Site B). However, as the researcher had already been able to contact a teacher from Site A via a university connection and conduct a semi-structured interview (after UCF IRB determination of "exempt" had been granted), that teacher – assigned the pseudonym *Vanessa* – was able to speak directly with her principal to obtain approval. Written permission to conduct research was then sent directly from the principal at Middletown Elementary to the researcher via email. Before visiting either site, the requisite background check and vendor badging process was completed by the researcher and copies of IRB documentation forms from both UCF and Frederick County were sent to each principal.

During the non-participant observation at Tuscarora Elementary, a third-grade mainstream teacher encountered by the researcher in the hallway, assigned the pseudonym *Elizabeth*, agreed to later participate in an interview over the phone. Prior to both interviews, consent forms that detailed the research process were sent to each participant via email.

Instrumentation and Data Collection

Phase I

Eleven of the twelve school districts which had been selected for this study made their 2016-2019 ELL Plans readily available via a Google search, which most often led to the official

district website and a link to download a PDF version of the policy (see Appendix I for all links used to access policy documents). While Calvert was ultimately included in the district sample, it had tentatively been excluded earlier in the research process due to the same obstacle as the one that had led to Wicomico's exclusion from the study – its plan was not publicly accessible. The researcher unsuccessfully attempted to contact a district official via email (with no reply) as well as to gain access using FLDOE's data request portal. It was soon discovered that such data requests can take upwards of a year to move forward, making it an unrealistic option. Eventually, a committee member was able to contact a prior colleague from Calvert who very promptly sent a PDF version of the 2016-2019 ELL Plan via email. Though this policy, once accessed, did state "Parents can access the ELL Plan through the district's website under Multicultural Education Department," the researcher was never able to find it in this way. Researcher error is certainly possible, however.

Each downloaded 2016-2019 District ELL Plan was prefaced by at least a couple of signed letters certifying the district official's approval of the subsequent policy. All documents were then printed, stapled into independent packets, and clearly labeled to ensure that pages from mismatched sources were not accidentally combined.

Phase II

As mentioned previously, the first semi-structured interview was conducted by the researcher prior to either of the site observations. The participant, Vanessa, agreed to be interviewed when directly asked in-person by the researcher; they were able to meet due to a mutual connection at the same university. The interview took place over the phone on Sunday, March 10, 2019. After an initial description of the research and an introductory conversation, interview questions were recorded using the smartphone application "TapeACall Pro". The

participant was alerted before the recording process began and had previously consented to being recorded as per UCF's and Frederick's IRB requirements. The researcher used the Practitioner Interview Protocol (Appendix D) to guide the question and answer process; additional, unplanned follow-up questions were also asked when Vanessa said something of interest. The recorded portion of the interview lasted 20 minutes and 2 seconds. The second interview took place on Wednesday, April 10, 2019, which was after both of the non-participant observations had occurred. The participant, Elizabeth, had encountered the researcher in the hallway of her school (Site B: "Tuscarora") during the observation and happily agreed to later be interviewed by phone after confirming that she did, in fact, have ELs in her class. The interview was recorded using the same smartphone application as previously after following the same consent process; its final duration was 15 minutes and 28 seconds. Recordings from both interviews were saved to a folder on the researcher's personal computer and uploaded to iCloud (both only accessible by the researcher via Apple ID and password) and then manually transcribed verbatim into two separate Word documents without the use of any external software.

In order to visit each elementary school and collect the observational data, the researcher was required to undergo a supplemental IRB process from Frederick County, obtain a background check, and purchase a vendor badge that granted access to each site. Approval documentation was sent via email from Frederick's IRB board to each principal and paper copies of all required forms were also provided to office staff by the researcher upon arrival. Instrumentation was simple and involved only a clipboard, lined paper, and a pen. The researcher took notes within a drawn table, indicating times at which certain observations took place as well as reflections on what some of the observations may imply or entail (the basic Observation Protocol is included in Appendix E). A few photographs of interesting wall displays were occasionally taken so the researcher could better describe such visuals later, though not

ultimately retained nor presented within this study. No classrooms were entered so as to not disrupt lessons during Spring testing, which was taking place at both schools. The researcher made an effort not to interact with students nor to ask them questions, though did reciprocate the occasional smiles, hellos, and comments they offered. Both observations were conducted on the same day – Friday, April 5, 2019 – possible due to the relatively close geographical proximity of the schools. The first observation at Site A lasted for 1 hour and 25 minutes (from 9:15 am until 10:40 am) and the second observation at Site B lasted for 50 minutes (from 11:20 am until 12:10 pm). This shorter time was largely due to the much smaller size of the second school and inaccessibility of certain areas. Staff were also more attentive and even occasionally warier than at the first site, so the researcher did not want to further interfere with daily procedures.

Data Analysis

The research questions were answered using a combination of descriptive statistics and thick-rich description relevant to the twelve a priori coded policy documents (Phase I) and qualitative techniques documenting and reporting upon the collection of ethnographic data (Phase II).

Phase I

The a priori coding process for Phase I was entirely manual and involved using nine different colored markers to highlight phrases within policy that met any of the inclusion criteria (when present) specified for each code (Table 1; Appendix C). Repeated instances – such as of similar or identical wording – were also highlighted, as the frequency of mentions could theoretically correlate to the importance of that particular practice within the district. Phrases already included as part of the template were never highlighted and tallied; only unique district

responses to template prompts were analyzed. Additionally, the same colors were used for all policy documents to guarantee uniformity and therefore to more easily enable comparison. The researcher also noted items of interest that could add context to later analysis, which included the presence of bilingual education programs within each district (Table 13), languages for which additional support was explicitly mentioned (Table 14), and parental communication protocol items just outside the realm of the codes.

Once a document had been highlighted, all selected phrases were transcribed under corresponding code-based categories into separate Microsoft Word documents by district. Cross-comparison was facilitated with this process, which allowed the researcher to see whether similar phrases had perhaps been coded in one policy and not in another; adjustments were occasionally made and selections were continuously checked to minimize potential errors. The transcribed phrases for each code were then counted and reported in an initial frequency table (Table 6). Furthermore, because all codes except for Code 6 (*Multiple forms of assessment for students to demonstrate their knowledge*), Code 7 (*Availability of staff from similar cultural backgrounds*), and Code 8 (*Accessibility of documents and translators for represented home languages*) included separate research-based inclusion criteria, the researcher printed each Word document of transcribed policy data in order to manually indicate to which criterion each phrase belonged for the remaining six codes. Doing this by hand allowed for quicker comparison across multiple policy documents to ensure the consistency of these determinations. For Code 4 in particular (*Establishment of a relationship between the school, students, their families, and the surrounding community*), many of the highlighted phrases were cross-listed across its multiple inclusion criteria.

Code 6, which involved documenting the discrete mentions of assessment types employed by each school district, was the only code not to require tallying repeated inclusions.

Instead, the researcher highlighted any and all assessment mentions, typed them into separate Word documents for each district as part of the data transcription process, and deleted duplicates to accurately count how many assessments, both formal and informal, were cited in each case. In order to comprehensively report these results and to compare them across districts, a table was created by listing all referenced evaluations down the left-hand side and placing checkmarks under district column headers when that evaluation was mentioned (Appendix H).

Findings are further contextualized in Chapter 4, which includes thick-rich description and explanations of observed patterns by code across the districts after presenting the frequency tables for each.

Phase II

Once the interviews and observations had been manually transcribed, the researcher began the process of open coding and axial coding the data. Much in the same way as the policy documents had been analyzed, different colored markers were used to select elements of interest. In this case, however, there was no template of a priori codes and inclusion criteria to follow. Instead, the researcher began by identifying the broader category to which the phrase belonged and assigning that category a color. For observational data, categories emerged directly from what was seen and heard. They therefore included *Visual displays*, *Multilingualism*, *Cultural mentions*, *Pedagogical observations*, and *Resources*. Notes relevant to the school itself as well as to encounters with faculty and staff were also included under the heading of *School description*. For interview data, broader categories were generally relevant to the questions asked of teachers; they therefore included the topics of *District ELL Plan mentions*, *Training and professional development*, *Culture and curriculum accessibility*, *Mentions of bilingualism*, *Parental communication*, and *Translation resources*. The researcher also separated inclusions of

miscellaneous opinions, teacher background information, and contextual information regarding the school and its programs.

Once each printed observation and interview transcript had been highlighted, all inclusions within larger categories were typed under corresponding headers in separate Word documents. Inclusions were sometimes cross-listed under more than one category, such as a teacher's opinion that was also related to training and professional development. Listing phrases by category allowed the researcher to create more specific axial codes, pairing related utterances together in order to form subcategories. These axial codes were color-coded (with different font colors) and listed under each of the previously-mentioned broader topics; inclusions of phrases for each (which had been changed to the matching font color to facilitate the process) were counted and their frequencies listed. While the broader categories stayed almost exactly the same for both observations and interviews, the axial codes that emerged differed. Tables 15 and 16 in Chapter 4 present all observation codes and their frequencies whereas Tables 17 and 18 present the same information for the interviews. All data are contextualized by narrative reporting and thick-rich description.

Credibility Techniques

The collection of multiple forms of data across Phases I and II was a form of cross-method triangulation (Denzin, 1978; Hitchcock et al., 2005; Patton, 1999), helping to ensure internal validity, whereas the CCS approach utilized in both phases assisted in confirming the dependability of the results (Stake, 1995). For Phase I, techniques to promote the trustworthiness and dependability of the results were utilized. Two content experts on the dissertation committee first reviewed the a priori code selections with the researcher before data analysis during a peer review process. Next, in order to verify the internal validity and transferability of the instrument,

these committee members independently coded one of the district policy documents so the frequencies they recorded could be compared to one another and to the researcher's first attempt (Ryan & Bernard, 2003). Having more than one outside expert code the document allowed for triangulation of the codes through the confirmability technique of intercoder reliability; this process also helped reduce researcher bias and confirm objectivity (Lombard, Snyder-Duch, & Campanella Bracken, 2006). The resulting three sets of frequencies, though the numbers did not completely match, created trend lines with the same patterns across the codes when subsequently graphed. This indicated that all researchers ultimately came to the same conclusions – with proportionate differences between each frequency – despite the variance in exact numbers. The greatest differences between the researcher's coding results and those of the committee members were found in the tallies for Code 1, Code 3, and Code 9. After reviewing the inclusion criteria and evaluating the process undertaken by committee members, small clarifications were made in wording and some of the tallies were reconsidered. These slight changes were applied to the a priori coding process for the eleven remaining policy documents.

For Phase II, member checking at the end of each interview was conducted to ensure an accurate portrayal of interviewee thoughts, beliefs, and opinions; this was a form of participant validation of data (Creswell & Miller, 2000). Member checking involves reviewing what was understood by the interviewer at the end of the conversation and inviting the interviewee to provide clarification, rephrase or retract a statement, or to include additional elaboration when necessary. Furthermore, the questions asked by the researcher were intended to be unbiased and not to lead the interviewee in any one direction when answering. It was emphasized that there was no desirable answer and that positive, negative, and even neutral responses would prove useful. Thick-rich contextual descriptions accompanying both phases of the research assisted in describing the potential transferability of the results to other situations and research settings.

Finally, Chapters 3 and 4 include an audit trail of all researcher actions and processes undertaken during the data collection and analysis processes in order to confirm reliability.

Summary

This chapter has provided an overview of the methodology the researcher employed to conduct this study, which consisted of a critical analysis of 2016-2019 Florida school district ESOL policies through the lens of CRP and the collection of additional qualitative data meant to add practical context to policy. One of the twelve districts (Calvert) was able to be included in the sample after a copy of its policy was sent directly from a district official to a dissertation committee member. The results of this policy analysis were later compared to the observed occurrences within two public elementary schools in the same district as well as firsthand accounts from practitioners within those schools. The study took a mixed-method approach to research data collection and analysis, and includes descriptively-reported a priori coding results, thick-rich reports and descriptions, and comparative examinations between districts and sites. The credibility techniques employed by the researcher to ensure the reliability of all types of data included faculty debriefing, independent coding by two additional members of the dissertation committee, and member checking at the end of each participant interview. Chapter 4 contains a detailed summary of the results gleaned from data analysis.

CHAPTER 4
ANALYSIS OF DATA

Introduction

This mixed-methods study was twofold, utilizing various sources of data in an attempt to gain a fuller, practically-contextualized view of current ESOL policy (2016-2019) and corresponding practice within Florida elementary schools. Phase I entailed a close analysis of District ELL Plans through the lens of CRP. The Florida Department of Education (FLDOE) requires all 67 school districts in the state to fill in the given blank template – which includes eleven sections of questions covering areas such as placement testing, parental communication, and suggested pedagogical approaches – with their chosen ESOL strategies and best practices. Table 4 presents a comprehensive summary of all topics covered within the plans; a blank template can also be found in Appendix A. District ELL Plans therefore serve as de facto policies meant to govern how schools within each district should work to meet the needs of their ever-growing numbers of ELLs.

After identifying nine research-based a priori codes that would indicate instances of culturally responsive practice, the researcher coded twelve district policy documents by hand and tallied the frequencies that each criterion of interest appeared, both by district and across the board, in order to ascertain whether such recommended practices were evident as well as whether there appeared to be any disparities between the twelve districts (assigned pseudonyms of counties from the state of Maryland). Phase II sought to qualitatively explore the impact of these policies on practice; in other words, to see if what was being described by teachers and observed within schools aligned with the expectation dictated by policy. Semi-structured interviews and non-participant observations were conducted within two elementary schools

within Frederick County (pseudonym), and elements of interest from each were recorded, axial-coded for emergent themes, and described.

The following research questions guided the data analysis procedures for this study:

1. In what ways, and to what extent, do ESOL policies in twelve criterion-sampled Florida school districts address culturally responsive best practices as described in the literature? (Phase I)
2. In a smaller purposive sample of two elementary schools within one of these Florida school districts, in what ways, and to what extent, do the observed and reported practices of each reflect fidelity of policy implementation? (Phase II)
    a. What kind of procedural similarities exist between these two selected schools?
    b. What kinds of procedural differences exist between these two selected schools?

Chapter 4 comprehensively presents and reviews the findings of the study and includes the following elements:

1. Gross frequency totals of all nine codes across the twelve districts (Table 6)
2. A systematic review of the totals for each discrete code and their more specific inclusion criteria, when applicable (Tables 7-12)
3. A summary of each code that contains additional notes and examples, all of which will be further discussed in terms of their implications in Chapter 5
4. Additional findings relevant to the discussion
5. Emergent themes for observation and interview data
6. Credibility techniques utilized by the researcher
7. A summary of the results

Phase I Results

The nine research-informed a priori codes (also included in Table 1 & Appendix C) were as follows. The numbers assigned to each correspond to any references to the same codes throughout the study.

1. Cultural education and responsiveness included within teacher professional development (PD)
2. Recommendations of culturally responsive pedagogical techniques
3. Provision of diverse curricular resources that portray individuals from different backgrounds
4. Establishment of a relationship between the school, students, their families, and the surrounding community
5. Promotion of mutual respect among students
6. Multiple forms of assessment for students to demonstrate their knowledge
7. Availability of staff from similar cultural backgrounds
8. Accessibility of documents and translators for represented home languages
9. Promotion of diversity as an asset and support of cultural preservation

Before looking at how frequently these codes appeared, however, it is necessary to note the page number variations for each policy document, as shorter documents could reasonably (though not definitively) be expected to have fewer recorded instances of a priori code inclusion. In the occasional circumstance wherein most of a page was blank, the researcher did not count it as a full page of text and instead approximated the total number of complete pages, taking partially filled pages into consideration. There was a wide range in document length represented across the twelve districts. Despite the same basic template being provided by the FLDOE to all

district officials, the longest policy document (Worcester, at 32 pages) was exactly twice the length of the shortest two (Charles and Cecil, at 16 pages each). Correspondingly, it contained the highest number of tallied codes. Some school districts simply provided more extensive and detailed answers than others, occasionally adding information outside of the explicit purview of FLDOE parameters. There were many instances in every district, however, wherein sentences or entire paragraphs were copied and pasted from one section to another to answer related questions. Additional findings and observations have been further noted after the Phase I portion of this chapter.

Table 5

Document Page Counts: 2016-2019 District ELL Plans

District*	Number of Complete Pages in 2016-2019 District ELL Plan
Worcester	32
Allegany	30
Somerset	27
Frederick	26
Calvert	23
Howard	23
Montgomery	23
Carroll	22
Talbot	21
Kent	20
Charles	16
Cecil	16
Total Pages	279

*All districts have been assigned the pseudonyms of counties in another state.

Gross Totals: A Priori Code Frequencies

Table 6 presents a general overview of all coding frequencies, listing districts in descending order from the highest total number of codes recorded to the fewest. It does not yet delve into the details of each code and their own inclusion criteria; it serves instead to illustrate

the areas of CRP that initially seemed present – as well as lacking – across the district sample. No district policy document possessed all nine a priori codes. Only Worcester's 2016-2019 District ELL Plan contained all but one of the codes, which was Code 5 (*Promotion of mutual respect among students*). Kent, in fact, was the sole district to include this concept at all. The most represented a priori code by far was the fourth, which may be because the FLDOE template contains a section requiring districts to explain their parental communication procedures (Section 8; see Appendix A). Most districts, however, had many more mentions of school-home communication than those confined to that section.

Table 6

Phase I: Gross Frequency Totals* of A Priori Codes Across Districts

District	Code 1: Culture and PD	Code 2: CRP Techniques	Code 3: Diverse Resources	Code 4: Family & Community	Code 5: Respect & Behavior	Code 6: Assessment Types**	Code 7: Staff Backgrounds	Code 8: Translation Services	Code 9: Valuing Diversity	Total
Worcester	3	21	3	72	0	28	1	47	28	203
Calvert	1	7	0	53	0	22	0	27	19	129
Allegany	7	15	0	36	0	28	0	28	5	119
Somerset	0	11	0	48	0	30	0	24	1	114
Frederick	0	13	0	48	0	30	0	21	0	112
Montgomery	2	10	0	46	0	19	0	34	0	111
Carroll	2	7	0	42	0	26	1	26	0	104
Howard	1	13	0	41	0	23	0	18	0	96
Kent	9	8	0	38	1	19	0	20	0	95
Talbot	1	6	0	35	0	23	0	14	2	81
Cecil	3	11	0	23	0	28	0	11	0	76
Charles	2	8	1	34	0	14	0	14	1	73
Total	31	130	4	516	1	290	2	283	56	1,313
Number of Districts (/12)	10	12	2	12	1	12	2	12	6	-

*Frequencies were obtained by counting each and every relevant mention of the a priori code, including repeated instances.

**Numbers for Code 6 represent the discrete assessment types included, both formal and informal, rather than the number of times all assessments were mentioned. For a complete list of these assessments, see Appendix H

Code 1: Cultural Education and Responsiveness Included within Teacher Professional Development

As has been made evident by the data presented in Table 6, Code 1 appeared relatively few times within District ELL plans when compared to the other nine codes. It referred to professional development sessions that focused upon metacognitive processes, self-reflection, and/or multicultural awareness, which are all recommended practices by CRP researchers (Montgomery, 2001; Gay, 2002). The code was not represented at all in Somerset or Frederick's plans and was tallied only 31 times across 279 total pages of policy. During the coding process, instances of *cultural education and responsiveness included within teacher professional development* were identified and tallied if they fit into one of the following three inclusion criteria:

1. Looking at one's own attitudes and practices (Montgomery, 2001)
2. Knowing ethnic groups' cultural values, traditions, communication and learning styles, and contributions to society (Gay, 2002)
3. Knowing how to use multicultural instructional strategies and add multicultural content to the curriculum (Gay, 2002)

Table 7 reports how many instances of these three criteria were coded by the researcher across the twelve district policies; districts are again listed in descending order from most inclusions to fewest. As is apparent, the least-represented criterion was the first. Only Allegany referenced the concept of *looking at one's own attitudes and practices*, with the provision that self-monitoring worksheets be made available at all schools via the Department of Bilingual Education and World Languages website. There was no further explanation as to the content of these self-monitoring worksheets nor whether this practice was required of all instructors, but the encouragement of self-reflection was nevertheless present. Allegany was also one of two districts

to mention a cross-cultural communications course, accounting for all five of their Criterion 2 frequencies. All citations of this course were counted, as each represented a separate time for which such relevant professional development was being made available for faculty members at varying levels (paraprofessionals, mainstream teachers, counselors, etc.). Kent was the one other district to do so; their comparatively high frequency of eight for Criterion 2 can similarly be attributed to their repeated mention of a "Cross-Cultural Communication and Understanding" PD session. Additionally, though Worcester did not reference a specific course, they did state that their PD would be focused on cultural awareness, "among other areas". No other districts offered – at least explicitly – professional development related to culture.

Table 7

Inclusion Criteria Frequencies* by District: A Priori Code 1 (CRP Included in PD)

District	Criterion 1: Self-reflection	Criterion 2: Cultural Awareness	Criterion 3: CRP Strategies	Total
Kent	0	8	1	9
Allegany	1	5	1	7
Worcester	0	1	3	3
Cecil	0	0	3	3
Carroll	0	0	2	2
Charles	0	0	2	2
Montgomery	0	1	1	2
Calvert	0	0	1	1
Howard	0	0	1	1
Talbot	0	0	1	1
Frederick	0	0	0	0
Somerset	0	0	0	0
Total	1	15	15	31

*Frequencies were obtained by counting each and every relevant mention of the a priori code, including repeated instances.

Kent uniquely specified that paraprofessionals would provide in-service PD "on an ongoing basis" in areas that included cultural differences and similarities. It was rare to see paraprofessionals valued as a cultural rather than as solely a linguistic resource across all twelve

district policies, and this was certainly the only instance in which they were described as leading any kind of faculty training. It is important to remember that the FLDOE (2015) requires any school with fifteen or more students who speak the same L2 to employ a paraprofessional (often called a para), though educational requirements for paras are much less stringent than those required of other teachers. Leading a PD session for faculty and staff technically above them in the school's hierarchy, then, is an interesting finding; unfortunately, there was no further elucidation. It would seem as if Kent was prioritizing the linguistic and cultural knowledge of paraprofessionals by allowing them to do so. However, as the low frequencies for Code 7 (*Availability of staff from similar cultural backgrounds*, Table 6) indicate, this was never directly stated.

Policy excerpts relevant to Criterion 3 (*Knowing how to use multicultural instructional strategies and add multicultural content to the curriculum*) were generally all very similar, related to classroom visitation, coaching, and modeling of effective ESOL strategies by district personnel. There were seldom specific mentions of which instructional strategies were being used, however, which means that the connection of these codes to CRP was arguably weak. Culture was not a topic raised by any district within this criterion except by Calvert, which noted that all workshops were hosted by their Office of Multicultural Education. Furthermore, Talbot, Carroll, and Cecil were the only districts which named the pedagogical approaches being focused upon within their PD sessions. Talbot defined SIOP (Sheltered Instruction Observation Protocol) as their instructional model of choice, and teaching approaches within SIOP should take student schemas and background knowledge into account. Cecil described another programmatic approach, Universal Design for Learning (UDL), as "a training model that promotes the use of various instructional strategies, taking into consideration diverse learners" – if executed properly, this practice could also be considered culturally relevant. Finally, Carroll indicated that many of

their teachers were trained using Kagan and AVID (Advancement Via Individual Determination) strategies, both of which focus on student-centered and collaborative instruction uniquely suited to the individual needs of each learner. Though these strategies do not specifically address cultural and linguistic needs, a student-centered approach necessitates tailoring instruction in all ways possible to assist learners, including within cultural and linguistic spheres.

Code 2: Recommendations of Culturally Responsive Pedagogical Techniques

Explicitly referring to the theoretical framework of this study – CRP on the part of teachers and faculty – this code was concerned with the teaching methods recommended by district policies and how many of them could be deemed culturally responsive. Twelve of the most frequently recommended pedagogical approaches were pulled from the research and served as the inclusion criteria during the coding process. They were as follows:

1. Explicit, clear instruction in language the student can understand (Gay, 2002)
2. Material related to the "hidden curriculum" and the state of society (Montgomery, 2001; Navarro, as cited in Brown, 2007; Bazron, Osher, & Fleishman, 2005; Gay, 2002)
3. Scaffolding techniques (Gay, 2002)
4. Journal writing (Montgomery, 2001)
5. Cooperative learning groups and discussions (Harriott & Martini, 2004; Navarro, as cited in Brown, 2007)
6. Frequent observation of student behaviors and social skills (Brown, 2007)
7. Usage of portfolios as assessments (Irvine & Armento, 2001; Montgomery, 2001)
8. Teacher-made tests to meet student needs (Brown, 2007)
9. Student self-assessment (Montgomery, 2001)

10. One-on-one instruction and individual student focus (Navarro, as cited in Brown, 2007)
11. Encouragement of critical thinking (Banks & Banks, 2004; Gay, 2000; Ladson-Billings, 1994)
12. Inclusion of speech and events that are culturally relevant to students (Irvine & Armento, 2001)

One of these inclusion criteria, number 7 (*Usage of portfolios as assessments*), was also a checklist item included in Section 4 as an option for a progress monitoring tool (among the additional choices of "Other Criterion Referenced Test," "Native Language Assessment," LEA/school-wide assessments," and "Other"). Ten out of the twelve districts included in the study sample checked this box, accounting for one tally in each case. All additional mentions of student portfolios in other sections were also tallied, as were the remaining inclusion criteria for Code 2. Of the twelve CRP-recommended pedagogical approaches listed above, seven were referred to in total within all of the 2016-2019 District ELL Plans. Policy stipulations related to the "hidden curriculum" (Criterion 2), journal writing (Criterion 4), cooperative learning groups and discussions (Criterion 5), student self-assessment (Criterion 9), and encouragement of critical thinking (Criterion 11) were not represented in any of the documents. Table 8 presents the number of times the seven remaining best practices were recorded during a priori document coding. Districts are, as previously, listed in descending order based on their gross totals.

Table 8

Inclusion Criteria Frequencies* by District: A Priori Code 2 (Culturally Responsive Techniques)

District	Criterion 1: Clear Instruction	Criterion 3: Scaffold Methods	Criterion 6: Observation of Students	Criterion 7: Usage of Portfolios	Criterion 8: Teacher-made Tests	Criterion 10: Tutoring & Small Group	Criterion 12: CRP: Events/ Speech	Total
Worcester	10	1	5	1	0	4	0	21
Allegany	3	0	9	1	0	1	1	15
Frederick	3	0	3	5	0	2	0	13
Howard	0	0	10	1	0	2	0	13
Somerset	4	1	4	1	1	0	0	11
Cecil	2	0	7	1	0	0	1	11
Montgomery	0	2	3	3	0	2	0	10
Charles	0	1	4	1	0	1	1	8
Kent	1	1	3	0	0	3	0	8
Carroll	0	1	3	1	0	2	0	7
Calvert	1	0	5	0	0	1	0	7
Talbot	0	0	5	1	0	0	0	6
Total	24	7	61	16	1	18	3	130

*Frequencies were obtained by counting each and every relevant mention of the a priori code, including repeated instances.

As Table 8 shows, almost half of the total tallies recorded for Code 2 fell within Criterion 6 (*Frequent observation of student behaviors and social skills*). Each policy document made multiple references to classroom observations, often conducted by district officials, ESOL coordinators and curriculum facilitators, and school principals. Calvert additionally mentioned that "reflective" walkthroughs were done by their Multicultural Education Director, which does not appear to be a universal position across the state of Florida. Allegany somewhat similarly stated that supervisors from the Department of Bilingual Education and World Languages would enact ongoing reviews to "ensure the delivery and fidelity" of each instructional model. Again, this was not a department mentioned by every district, and naming conventions for all positions and departments seemed to vary widely from policy to policy. What remained consistent, however, was that observations were frequently described as intended to assess the

comprehensibility of instruction as well as to monitor individual student progress as demonstrated by classroom performance. Howard explained that their observations could also "determine signs of struggling"; findings could ideally lead to the amelioration of any observed problems. A part of Criterion 6 a bit less covered, however, was student behavior outside of the classroom or any sort of assessment of their social skills. There was no mention of this topic, meaning that – even despite the comparably high frequencies of Criterion 6 represented within Code 2 – its provisions were only partially present within the twelve district ESOL policies.

The term *culturally responsive* was explicitly included within two of the policy documents (those of Cecil and Charles). Both contained the exact same statement, repeated word-for-word (as well as additional sections that appear to have been copied verbatim from one district's policy to the next, though it is impossible to know which came first): "Instruction must be grade-appropriate, age-appropriate, and culturally responsive." These provisions fell under Criterion 12 ("Inclusion of speech and events that are culturally relevant to students"), as did Allegany's requirement that learning events be tailored to the cultural, linguistic, and special needs of families within the district. There were no additional mentions of cultural responsiveness.

The first criterion (*Explicit, clear instruction in a language the student can understand*) was the second most represented element within district policies for Code 2 after the sixth, though its total of 24 can mostly be attributed to Worcester's focus upon this topic (with a frequency of 10). Howard, Montgomery, Charles, Carroll, and Talbot made no reference to the necessary clarity of the language of instruction, and Cecil, Kent, and Calvert all included only between one to two mentions each. These rare inclusions for Cecil and Calvert for Criterion 1 were comprised of their direct mentions of native language assessment (though, in Calvert, such assessment was described as only conducted for students enrolled in their dual language

programs, so this provision was limited), and Kent clearly specified that paraprofessionals would "assist students in the understanding of instruction and key concepts by utilizing the students' native language," as did Somerset and Worcester. While this is surely a welcome practice under the umbrella of CRP, no mention was ever made by any district as to how *English* may be adapted by the lead teacher in order to ensure comprehensibility of the lesson. Observations were commonly described by all as meant to check upon this facet – instructional comprehensibility – though there was never any description of what this might entail on the part of each teacher. Again, Worcester's practices were the most extensive for Criterion 1, detailing 1) case-to-case determination of the necessity of L1 testing for the most accurate results, 2) the development of personalized L1 assessments of oral tests when students lacked literacy skills, 3) the purchase of supplemental materials in a language that could be understood by students, 4) bilingual programs to "enable the student to develop and attain English proficiency," 5) L1 support in the classroom, 6) translated, multilingual pedagogical instruments, and – as Kent and Somerset also mentioned – 7) the assistance of bilingual paraprofessionals to ensure comprehensible instruction.

In addition to Cecil and Calvert's provisions for native language assessment, Frederick, Allegany, and Somerset also explicitly incorporated L1 assessment into their policies (see Table 9 for a clearer breakdown of district practices). Carroll, Talbot, Kent, and Montgomery all included the somewhat vaguer phrase that "level of mastery of basic competencies or skill in English and/or home language according to criterion-referenced standards" was to be an assessment procedure, which implies that some unspecified form of L1 assessment was permissible and common. Only Howard and Charles made no mention of any sort of L1 testing practice.

Table 9

Native Language Assessment Practices by District

District	Present in Policy		Not Present in Policy
Frederick	✓		
Somerset	✓		
Allegany	✓		
Worcester	✓		
Cecil	✓		
Carroll	✓ (unspecified*)		
Talbot	✓ (unspecified*)		
Howard			✓
Calvert	✓ (partial**)		
Kent	✓ (unspecified*)		
Montgomery	✓ (unspecified*)		
Charles			✓
District Totals	Explicit 5	Unspecified 5	 2

* In all such cases, wording was as follows: "Level of mastery of basic competencies or skill in English and/or home language according to criterion-referenced standards."
**Calvert uses the IDEA IPT (Spanish) only for students in dual language programs. They additionally mentioned the "unspecified" criteria above for other circumstances.

Criterion 10 (*One-on-one instruction and student focus*) was fairly evenly distributed across all 2016-2019 District ELL Plans, nine of twelve of which mentioned at least one of the following: tutoring, individual and/or small group work, and/or the identification of individual student needs. Somerset, Cecil, and Talbot were the only districts which failed to do so. Scaffolding techniques, Criterion 3 for Code 2, included the development of instructional aids and a modified curriculum (Kent), the assurance of differentiated instruction (Montgomery), the structuring of curriculum so prior knowledge could be considered (Somerset), lesson modification ensured by principals (Carroll), and adjusted accommodations to concepts and materials (Worcester). Allegany, Frederick, Howard, Cecil, Calvert, and Talbot did not indicate the scaffolding strategies utilized within their districts' schools.

Code 3: Provision of Diverse Curricular Resources that Portray Individuals from Different Backgrounds

This code was one of the least-represented CRP criteria amongst the nine that guided the research process. There were only four coded phrases in total between two districts, Worcester and Charles, which at all mentioned the notion of a curriculum concerned with promoting diversity and multiculturalism. For this reason, a frequency table is not included for Code 3. Policies were reviewed by the researcher for the following four recommended practices:

1. Teacher supplementation of curricular instruction with material that sensitively and realistically portrays individuals from different backgrounds (Richards et al., 2007)
2. Teacher awareness of potential stereotypical materials included in textbooks and other pedagogical resources (Richards et al., 2007)
3. The creation of student-centered bulletin boards that contain culturally relevant images and themes (Richards et al., 2007)
4. Student-recommended and/or produced resources to add meaningful context to instruction (Richards et al., 2007)

In the case of Worcester, officials specified within their District ELL Plan that funds would be used to coordinate district-wide programs designed to enhance multicultural curriculum development and implementation as well as to purchase supplemental classroom and media center instructional materials in English and the native languages of students and parents (including heritage language dictionaries). The policy also stated that curriculum had been developed to provide teachers with the tools and information to infuse a multicultural perspective into their respective field of study. These three highlighted cases all fell into the realm of the first inclusion criterion. Likewise, Charles' one recorded case – which stated that additional materials

would be purchased by the district and training would be provided to paraprofessionals on how to use them to deliver instruction to ELs – also fell within Criterion 1. Despite these provisions seeming to be positive ones, the absence of stipulations relevant to the other two inclusion criteria in either district, as well as the complete lack any criteria for this code presented by the other ten of them, may indicate that a closer look should be taken at the suitability of the curricular materials used within Florida's public schools. This is one reason why data triangulation was utilized within this particular study. Subsequent observational and interview data also shed more light on daily practice, including the curriculum utilized by instructors.

Code 4: Establishment of a Relationship Between the School, Students, their Families, and the Surrounding Community

Code 4's criteria were less related to pedagogy and more related to the social environment established by each district and therefore meant to permeate through to individual schools. Concerted efforts to communicate with and involve parents with decision-making processes and community events could certainly create a welcoming atmosphere, for example, one that is naturally more conducive to learning as well as one that adds validity and importance to the home lives, languages, and cultures of students and their families. The researcher scanned for the following five elements within the District ELL Plans:

1. Mentions of communications to parents of ELs regarding news, policies, and school events that may be occurring (Richards et al., 2007)
2. Invitations for parents and family members to participate in community events (Richards et al., 2007)
3. Eligibility of parents to join committees and contribute to school-based decision making (Richards et al., 2007)

4. Mentions of parental workshops and conferences (Richards et al., 2007)
5. Discussion of respect for parents, guardians, and other family members (Richards et al., 2007)

Table 10 displays the frequencies with which these five criteria appeared. It is important to note that the total of 574 included within this table is higher than the initial gross frequency of 516 reported in Table 6 for Code 4. This is an intentional disparity, necessary due to the fact that multiple statements within district policies for Code 4 were relevant to more than one of its inclusion criteria; they were therefore cross-listed when necessary. Doing so better illustrated which aspects were and were not represented within the code, although the initial – and lower – gross total reported in Table 6 still represents the discrete number of mentions identified prior to them being sorted into the inclusion criteria.

Furthermore, Section 8 of the policy template, entitled "Parent, Guardian, Student Notification and Rights," contains a list of 26 potential circumstances for or during which school-home communications may be sent; checkboxes next to each are left open for district officials to select and therefore to decide which situations would merit parental notification. In order to avoid inflated numbers for Code 4 by tallying each and every time one of these 26 checkboxes was selected, the researcher instead opted to look specifically at the five of them most relevant to parental participation and community involvement: 1) Invitation to participate in an ELL Committee Meeting, 2) Invitation to participate in the Parent Leadership Council (PLC), 3) Parental choice options, school improvement status, and teacher out-of-field notices, 4) Information about community services available to parents, and 5) Information about opportunities for parental involvement (volunteering, PTA/PTO, SAC). Other items on the checklist were related to student updates, testing procedures and delays, disciplinary forms, standards requirements, and similar procedural, day-to-day occurrences. Though they were not

specifically tallied within the code, the researcher made note of the total numbers of checked boxes out of 26 recorded by each district. Only Howard, Montgomery, Cecil, and Calvert checked all 26 of them.

Table 10

Inclusion Frequencies* by District: A Priori Code 4 (Relationship between School and Family)

District	Criterion 1: Communication	Criterion 2: Participation	Criterion 3: Committees	Criterion 4: Meetings	Criterion 5: Respect	Total
Worcester	42	4	20	11	10	87
Calvert	27	5	19	2	1	54
Somerset	21	4	20	5	3	53
Howard	20	3	20	6	3	52
Frederick	22	2	25	2	1	52
Montgomery	18	5	17	7	0	47
Carroll	17	1	16	10	1	45
Kent	11	2	26	3	1	43
Allegany	11	5	12	5	9	42
Talbot	12	1	19	6	0	38
Charles	14	3	13	4	3	37
Cecil	8	2	9	3	2	24
Total	223	37	216	64	34	574

*Frequencies were obtained by counting each and every relevant mention of the a priori code, including repeated instances.

In terms of the five items specifically selected for Code 4, Talbot omitted the invitation of parents to the PLC (as well as two other outside checklist items), Kent omitted parental choice options and opportunities for parental involvement (in addition to five outside checklist items), and Carroll omitted community service information (and seven more outside checklist items). Worcester, Somerset, and Charles each checked all five of the coded practices but omitted between two and five additional outside checklist items.

As Table 10 makes evident, a majority of the tallies recorded for Code 4 fell within the confines of Criterion 1 (*Mentions of communication to parents of ELs regarding news, policies, and school events that may be occurring*). Coded phrases were largely comprised of mentions of

parental rights letters, testing and placement procedures, notification of testing delays, assistance with registration procedures, ELL Committee notes, ESOL program exit notification, and other related topics. To add context, ELL Committees are present at every Florida school, generally made up of parents and teachers, and meant to convene to discuss individual student situations and decisions related to ESOL placement procedures, exit recommendations, and classroom accommodations. The high frequencies found for the kinds of inclusions encompassed by Criterion 1 are perhaps unsurprising in that almost all of them were minimum requirements set forth by the state; as a result, similar mentions were uniformly represented across all twelve districts.

There were also many coded instances for Criterion 3 (*Invitations for parents and family members to participate in community events*); similarly to Criterion 1, many of these can be attributed to the requirement of districts to include parents on their ELL Committees. Multiple references to ELL Committees were made throughout each 2016-2019 District ELL Plan, as they convene frequently for a variety of reasons. Parents were also frequently cited as having an influence upon major decisions related to their child(ren)'s academics, whether due to their involvement on the committee or due to their ability to privately request help from faculty. The PLC (which all districts except Talbot described as including parents as members) is also tasked by the FLDOE with reviewing the District ELL Plan and providing ultimate approval. However, a section in the FLDOE template asks whether the PLC has provided this approval with available checkboxes for "yes" and "no". Though all districts in the study sample selected "yes," it seems possible to adopt policy regardless if an adequate reason accompanies the selection of "no".

A majority of inclusions coded for Criterion 4 (*Mentions of parental workshops and conferences*) were in reference to parental interviews being conducted for placement and exit purposes. However, a few exemplary districts – particularly Worcester – described programs and

events dedicated to supporting parents in various capacities. Among other provisions, Worcester keeps a lending library of books written in Spanish for parents and hosts family literacy, parent training, and multilingual parent volunteer programs. They also detailed the conduction of informational meetings hosted at the school, during community events, and even at mall fairs in order to ensure that all parents had the opportunity to attend. Their exceptional efforts made the absence of similar language in other policies more evident. It must be remembered, however, that practice does not necessarily reflect policy – the researcher cannot know if more parent outreach activities occur within each of the selected districts than what they chose to describe in just one document.

Perhaps unsurprisingly, Worcester also led the way in mentions of respect for parents and family (Criterion 5), though Allegany extensively covered this recommended aspect of CRP as well. Worcester acknowledged that cultural differences may impede parental understanding of their role in the educational process. They therefore encouraged open communication at community centers in order to convey the importance of parental involvement via activities that "will empower parents to be advocates and partners in the education of their children." Likewise, Allegany argued for the importance of advocacy within their plan and described an "Executive Board" – the only district to possess one – comprised of parents "whose interest is to become more involved in the school system and eventually assist other parents to become advocates on behalf of their children." They described similar free workshops as those provided by Worcester with the additional provision that parents be provided "tool kits" including workbooks in different languages to complete with their children at home. Neither of these districts served as the site of the interviews and observations conducted for Phase II; their clearly extraordinary practices, therefore, could not be further explored. However, if schools within Worcester and Allegany counties are faithfully executing these polices, the above findings could certainly be

considered a step in the right direction towards CRP.

Code 5: Promotion of Mutual Respect Among Students

Across all 279 pages of District ELL Plans, there was only one relevant instance of a practice that could be connected to Code 5; therefore, a frequency table has not been included. Kent's policy specified that paraprofessionals should help teachers to reinforce positive learning and behavior patterns among all students, which fit within the first inclusion criterion (*Enforcing standards of behavior in the classroom*). No other districts made any mention of related provisions. To add additional context to what the researcher was searching for, the following four specifications served as inclusion criteria during the a priori coding process:

1. Enforcing standards of behavior in the classroom (Richards et al., 2007)
2. Teachers serving as role models of fairness and kindness (or related concepts) in the classroom (Richards et al., 2007)
3. Anti-bullying policies school-wide or within the classroom related to cultural and linguistic differences (Richards et al., 2007)
4. Monitoring of student behaviors and communication styles, with awareness of which may be the result of cultural differences, to avoid unfairly penalizing ELs (Richards et al., 2007)

Though the widespread absence of the concept introduced by Code 5 does not mean that respect between students and anti-bullying efforts are not present and even valued within Florida school districts, it could indicate that the importance of such practices has not yet been adequately considered during the formulation of ESOL-related policy.

Code 6: Multiple Forms of Assessment for Students to Demonstrate their Knowledge

Because standardized assessments alone may paint an incomplete picture of student ability, it is recommended that school faculty and administrators consider multiple means of learner evaluations, both formal and informal, to better gauge their strengths and weaknesses (Alaska Standards for Culturally Responsive Schools, n.d). This practice can be considered culturally responsive because of its very acknowledgement that academic readiness and ability are more complex than what one exam can demonstrate, particularly when considering the ongoing social adaptation and linguistic development of ELs. The frequencies presented in Table 6 for Code 6 represent the discrete number of assessment names and types mentioned by each district. Unlike other codes, for which each recurrence of similar or identical concepts was counted again – as increased prevalence of an idea could theoretically be connected to increased importance and value – the researcher felt it would be more analogous to the purpose of this code to instead locate, record, and compare the assessments offered by each school district.

As Table 6 makes evident, total assessments mentioned ranged from 14 (Charles) to 30 (Somerset and Frederick). While there is no easy way to determine which number of assessment types should prove sufficient, these statistics are simply presented here as a descriptive finding. Appendix H further includes an extensive table that lists all cited assessment formats down the rows and all of the districts as column headers. When an assessment was mentioned within a district's ELL Plan, a check was placed in the corresponding box. Since the table is organized in descending order by frequency that the assessment was included within district policies, it is easy to identify areas of inconsistency across the board.

This finding – district inconsistency – is what ultimately proved of most interest to the researcher, as it was immediately clear that every district did offer multiple forms of student

evaluation and therefore met the basic criterion set forth by Code 6. Only one assessment type, in fact – WIDA ACCESS 2.0 – was referenced at least once by every school district within the study sample. This is a requirement set forth by the state within the original template (Section 5; see Table 4; Appendix A). WIDA, which stands for "World-class Instructional Design and Assessment," is an extensive instructional program that includes a series of tests (screening, placement, and benchmarks) accompanied by pedagogical standards (WIDA Consortium, 2018). Their six established language proficiency levels (1 being entry-level and 6 being the final level before exit from ESOL) are also commonly referenced and utilized nationwide. Currently, 35 U.S. states, including Florida – plus the Northern Mariana Islands and the Virgin Islands – have officially adopted WIDA and its accompanying assessments and standards (WIDA Consortium, 2018).

Supplementary placement tests to WIDA, however, also included LAS Links ("Language Assessment Scales," Worcester), IPT Oral/Aural and Reading/Writing Tests (occasionally referred to as IDEA Proficiency I and II and therefore listed separately in Appendix H as a naming variation; mentioned in some form by all districts except for Worcester, Montgomery, and Kent), and the online Comprehensive English Language Learning Assessment (CELLA; Allegany and Montgomery). After WIDA, the Florida Standards Assessment English Language Assessment (FSA ELA) was the second most frequently named, as it was mentioned by every district except for Somerset. However, 62 total rows of discrete assessments are included in Appendix H, as well as an additional row wherein checkmarks represent miscellaneous assessment types. A full 25 of the 62 total discrete assessments were only mentioned by one district each, including the Kaufman Test of Educational Achievement (Somerset), the ACT (Worcester), FSA practice tests (Montgomery), and the Pre-IPT (Talbot). Native language writing samples were only included in Allegany's ELL Plan, and computerized learning

programs with built-in evaluation tools were especially inconsistent. *Reading Wonders* and *Journeys* were utilized by Cecil and no other school district, and *Discovery Ed*, *STAR*, and *FASTER* were only mentioned by Howard. Furthermore, just two districts (Frederick and Kent) referred to formative assessments; progress reports were cited only by Calvert and Kent. Native language assessment practices were detailed in Table 9 for Code 2, as linguistic support was just outside of the realm of what was covered by Code 6.

There was, then, no shortage of references to formal, standardized assessments. What proved lacking were informal evaluations of student behavior, social adaptation, and acculturation processes, which the Alaska Standards for Culturally Responsive Schools (n.d.) describe as vital in order to paint a complete picture of student progress. The table presented in Appendix H illustrates that student interviews were selected as an evaluative method by ten of twelve districts (all but Howard and Charles) and generalized classroom performance was cited by nine of them (all but Carroll, Montgomery, and Kent); however, social experience was included only by Talbot, and student behavior – including study habits and attendance – was only mentioned by Carroll.

Code 7: Availability of Staff from Similar Cultural Backgrounds

This code did not equate mentions of bi/multilingualism or translation services with cultural awareness; all such references were confined to Code 8. An individual's ability to speak another language does not guarantee a familiarity with the cultural background represented by the students and/or family they are assisting. Linguistic support is certainly necessary and an important element of CRP at any educational institution, but newcomer populations to the United States also need to feel that their emotions, perspectives, and opinions are understood by faculty at the school in which they or their children are enrolled (Alaska Standards for Culturally

Responsive Schools (n.d.). School employees should, then, do their best to research the cultural norms of the countries from which their students come; hiring staff from similar backgrounds is also a wise move, as it ensures both their linguistic proficiency and cultural awareness.

There were no additional inclusion criteria for Code 7 since the concept does not consist of multiple facets. The researcher instead searched for any instance in which something pertaining to the above description appeared within policy. Because only two cases were ultimately found (one for each Carroll and Worcester), a frequency table has not been included for this code. Carroll's provision was less specific than the one made by Worcester, as they simply indicated that the *home language* of the bilingual paraprofessionals who they hired to work with ESOL students must be Spanish. This differed from all other policies, which generally just required prospective employees to possess a certain level of proficiency in the L2 of the students. The term "home language," however, dictates that a paraprofessional cannot just have studied Spanish but must have grown up speaking it as an L1. The word *culture* was not directly stated but speaking an L1 other than English necessitates an innate familiarity with another country's culture. Worcester's inclusion was also related to the hiring of paraprofessionals – as well as school psychologists, speech and language pathologists, resource teachers, and interpreters – who they clarified were both bilingual *and* bicultural. No other district made explicit mention of the term *bicultural*.

Code 8: Accessibility of Documents and Translators for Represented Home Languages

This code was perhaps the most straightforward in the study: it simply involved the researcher highlighting any and all instances in which translation services were mentioned within the 2016-2019 District ELL Plans. There were no additional inclusion criteria. It must be noted that Section 8 of the FLDOE template (Table 4; Appendix A) does prompt district officials to

describe the procedures used by personnel to provide assistance to parents or guardians of ELLs in their home language as well as to indicate the school-to-home communications sent by the school in a language that could be understood; because of this, every district referenced translation services multiple times on at least those two occasions. Table 11, however, illustrates just how much these frequencies varied across all twelve districts.

Table 11

Inclusion Frequencies* by District: A Priori Code 8 (L1 Translation Support)

District	Recorded Frequency
Worcester	47
Montgomery	34
Allegany	27
Calvert	27
Carroll	26
Somerset	24
Frederick	21
Kent	20
Howard	18
Charles	14
Talbot	14
Cecil	11
Total	283

*Frequencies were obtained by counting each and every relevant mention of the a priori code, including repeated instances.

Each district's recorded frequency for Code 8 does at least roughly correlate to their document lengths (Table 5), but some tallies reported in Table 11 can also be partially attributed to the number of languages explicitly mentioned within each policy as being supported in some way by the district. Table 14, included in the "Additional Findings" section of this chapter before Phase II results, shows that total number of referenced languages ranged from eleven (Kent) to one (Talbot, Carroll, Howard, and Charles). Each mention of a foreign language was not coded as part of Code 8, simply recorded and noted as a finding of interest, but districts that made

provisions for more languages sometimes also made more generalized references to translation services in those languages (and vice versa). These services were all very similar, generally ranging from parental communication letters being translated by staff to interpreters being made available for face-to-face meetings and the occasional mention of bilingual instruction. In other words, the nature of all coded mentions was relatively consistent. All schools with large populations of ELs are required to hire bilingual paraprofessionals, which was therefore a practice referenced by every policy, and each district similarly referred to the potential of bilingual staff being present to assist.

Of course, some districts described more explicit supports and services than others. Worcester, for example, listed the supplementary aids of TransACT (an online subscription service with a library of parental notifications in multiple languages), Language Line (a phone service), area translators, and community volunteers. Charles named a different phone service, the MCSD telephone system, which they stated could place calls in English and Spanish; interestingly, however – and perhaps worryingly – they also described Google Translate as "sometimes" used by registrars and office personnel, which was not something claimed by any other district. Carroll was the only other district to mention a phone service, though they did not state the name of the program utilized. Somerset cited ELLevation, a platform they described as providing support for 36 languages, but no other district indicated the use of this extensive support system. Both Calvert and Talbot referenced TalkSystem, which can be used as an interpretation service during parent conferences.

Allegany, Howard, Frederick, Montgomery, Kent, and Cecil neglected to include the specific program names of any translation services within their 2016-2019 District ELL Plans.

Code 9: Promotion of Diversity as an Asset and Support of Cultural Preservation

The last of the a priori codes, this code sought to assess whether stipulations within district policies promoted and celebrated multiculturalism and diversity, as doing so would also imply the social and environmental support of ELs while at school. Any mention of one of the following best practices, as recommended by CRP researchers, was considered relevant during the data analysis process:

1. Multicultural nights or events that celebrate the cultures of the students (Brown, 2007)
2. Explicit expression of the district's desire to value and preserve the home culture(s) of their students (Chamberlain, 2005)
3. Encouraging teachers to learn about the histories, experiences, and cultural practices of the diverse groups represented within their classrooms (Richards et al., 2007)
4. Workshops for teachers, students, and/or parents that promote an appreciation of diversity (Richards et al., 2007)

As Table 12 makes evident, only Worcester and Calvert made a significant number of mentions of applicable procedures, almost all of which fell within the purview of Criterion 2 (*Explicit expression of the district's desire to value and preserve the home culture(s) of their students*). Allegany, Talbot, Charles, and Somerset also each had at least one coded instance of Code 9, but no other districts in the sample cited any aspect of policy related to this topic. Beginning with Worcester, most of their 27 mentions of Criterion 2 can be attributed to their frequent citation of their Department of Multicultural Education (referenced 20 times in total throughout the document in various contexts). Additionally, however, they stated that Title I staff

had been working with district personnel to ensure that their programs were culturally sensitive to the district's diverse population, an exceptionally considerate provision that was unique amongst all twelve districts in the sample. They continued by describing how funds were allocated to enhance multicultural curriculum development and implementation as well as by disclosing the topics that they included within their multicultural education courses: Hispanic/American Studies, Haitian/American Studies, General Immigrant Studies, Holocaust Studies, and Multicultural Studies.

Table 12

Inclusion Frequencies* by District: A Priori Code 9 (Promotion of Diversity)

District	Criterion 1: Multicultural Events	Criterion 2: Value Home Culture	Criterion 3: Cultural Education	Criterion 4: Diversity Workshops	Total
Worcester	0	27	1	0	28
Calvert	0	18	0	1	19
Allegany	0	1	0	4	5
Talbot	2	0	0	0	2
Charles	0	0	0	1	1
Somerset	0	1	0	0	1
Howard	0	0	0	0	0
Frederick	0	0	0	0	0
Montgomery	0	0	0	0	0
Carroll	0	0	0	0	0
Kent	0	0	0	0	0
Cecil	0	0	0	0	0
Total	2	47	1	6	56

*Frequencies were obtained by counting each and every relevant mention of the a priori code, including repeated instances.

Calvert's policy provisions, though second only to Worcester for Code 9, were not nearly as extensive; all 18 of their codes for Criterion 2 came from their mention of a Multicultural Education Department (which, importantly to note, not all districts mentioned having). Their one tally for Criterion 4 (*Workshops for teachers, students, and/or parents that promote an*

appreciation of diversity) was due to their description of an annual Multicultural Summer Institute that provided cultural training workshops. Allegany's inclusions for Criterion 4 were related to similar workshops, various of which were listed and all of which were designated for parents. They were described as allowing parents "to spend quality time with their children in a culturally-rich setting designed to maximize learning experiences" and said to be "tailored to be sensitive to families' cultural, linguistic, and special needs"; such level of detail was not commonly found within any of the District ELL Plans. Charles was the final district to cite relevant workshops and as well as the only district to explain that these workshops were intended to discuss "what is being done at schools throughout the district to promote diversity".

Lastly, Talbot was the sole district to mention anything relevant to Criterion 1 (*Multicultural nights or events that celebrate the cultures of the students*) with their specification that a Hispanic Heritage Celebration was held annually at a technical college within the district. As always, however, that is certainly not to say that similar events are not hosted elsewhere in the state, simply that they were not accounted for within ESOL policy.

Additional Findings

The following tables have been included here, at the end of Phase I, in order to provide additional contextual information about the twelve sample districts that was not specifically relevant to the nine a priori codes nor to their inclusion criteria. Table 13 defines which district policies indicated the presence of either Maintenance Bilingual Education programs (considered *One-Way*, as learners generally share the same L1 and/or level of fluency in that L1 and are learning the same L2 in full-immersion coursework at least part of the time) or Dual Language Education programs (considered *Two-Way*, as learners are divided into two L1 groups but are all actively learning an L2 in full-immersion coursework at least part of the time).

Table 13

Bilingual Education Programs by District

District	Maintenance Bilingual Education (One-Way)**		Dual Language Education Program (Two-Way)**	
Allegany	✓		✓	
Calvert	✓		✓	
Frederick	✓		✓	
Carroll	✓*			
Worcester	✓			
Somerset	✓			
Howard			✓	
Charles				
Montgomery				
Talbot				
Kent				
Cecil			✓	
	Yes	No	Yes	No
Totals	6	6	5	7

*Carroll policy specified that only one school within the district had this program. It is not widespread.
**The duration of these programs is not mentioned within policy.

Bilingual education programs do not *by definition* address aspects of culture, yet schools in the United States that teach core-curricular coursework in languages other than English convey, whether intentionally or unintentionally, to ELs that their L1 holds value and importance. As language is intrinsically tied to culture and identity (Norton, 2013), the importance of such programs cannot be overstated.

Finally, the first section of Chapter 4 closes with Table 14, which details the languages mentioned by each district's policy and information regarding the support they offer for those languages.

Table 14

Languages with Translation and Instructional Support Offered by District

District	Number Mentioned	Language(s)	Additional Notes
Kent	11	Spanish, Vietnamese, Korean, Arabic, Haitian-Creole, French, Swahili, Tagalog, Chinese, Portuguese, Gujarati	Paraprofessionals are available within the district for the first five languages mentioned. Resources are available to assist in the additional languages.
Frederick	6	Spanish, Haitian-Creole, Portuguese, Chinese, Arabic, Russian	N/A
Cecil	4	Spanish, Haitian-Creole, Arabic, Chinese	Assistance by a bilingual professional is only guaranteed for Spanish and Haitian-Creole.
Somerset	3	Spanish, Haitian-Creole, Portuguese	Translation services and resources may be available for additional languages.
Worcester	3	Spanish, Portuguese, Haitian-Creole	N/A
Calvert	3	Spanish, Haitian-Creole, Russian	Assistance in Haitian-Creole is not guaranteed; Spanish is. Russian is only mentioned once.
Allegany	2	Spanish, Haitian-Creole	Translation services and resources may be available for additional languages.
Montgomery	2	Spanish, Haitian-Creole	Translation services and resources may be available for additional languages.
Talbot	1	Spanish	Help could be provided “in the home language”; unspecified.
Carroll	1	Spanish	Translation services and resources may be available for additional languages.
Howard	1	Spanish	Translation services and resources may be available for additional languages.
Charles	1	Spanish	N/A

Phase II Results

The second phase of this study was intended to add school-level, descriptive context to the policy analysis conducted in Phase I, as what is stated on paper only carries so much significance when attempting to assess current ESOL practice in the state of Florida. While the subsequent interviews and observations detailed within Phase II were not particularly extensive and therefore not generalizable to other schools across the state, they nonetheless introduced alternate perspectives and represent the current and very real experiences of two mainstream teachers employed by two Florida schools. They also provide an opportunity to explore the fidelity of policy implementation as well as the general impact of policy on practice.

Site Background and Context

Two elementary schools were purposively sampled (Creswell & Plano-Clark, 2011; Patton, 2002) by the researcher based on their location within one of the twelve districts of interest for this study, willingness of the principal to participate, and the percentage of ELs reported by each school. Despite belonging to a district that met the sampling criterion of at least 10% ELs, a district average does not guarantee that individual schools within its confines will have student populations that follow the same demographic patterns. School A, given the pseudonym Middletown Elementary, reported via the official district website that their ESOL population stood at 29.7% during the 2016-2017 school year. 2016 was the first year that the 2016-2019 District ELL Plans went into effect, so it was the year for which data were consulted by the researcher, and it was also the last year that the district itself reported demographic data. School B, assigned the pseudonym Tuscarora Elementary, similarly reported enrolling 33.5% ELs during the 2016-2017 school year. Conversations prior to the recordings with each teacher

interviewed confirmed that each school still enrolled more than the requisite percentage of ELs for this study in 2019.

Middletown Elementary is a fairly large, two-story, modern-looking school in an upscale suburban neighborhood in Frederick County. Additional portables are located outside. Teacher 1, assigned the pseudonym Vanessa, was the interview participant for this site. According to Vanessa, though all teachers are ESOL-endorsed as per the requirements of the 1990 Consent Decree, there are no ESOL classes or ESOL teachers. Paraprofessionals, however, are brought in for occasional assistance. Vanessa also noted that the assistant principal at the school was originally an ESOL student as well as fluent in Spanish. Most ELs at Middletown Elementary are from Brazil, though "a handful" of them are from Spanish-speaking countries. There is no bilingual or multilingual education program at Middletown; classes are all English-medium and monolingual.

Tuscarora Elementary is a bit smaller than the first school, though it is also two stories and has rows of portables outside. The surrounding neighborhood is a bit more worn down and lower-income than the first, though the school itself is recently-constructed and well-equipped. Teacher 2, given the pseudonym Elizabeth, was the interview participant for this site. Though the school's website lists eight teachers as being ESOL teachers, Elizabeth echoed Vanessa's description of the instructional staff at Middletown by explaining that everyone at Tuscarora was *endorsed* in ESOL but that no one was specifically an *ESOL teacher*. Unlike Middletown, however, Tuscarora offers a two-way dual language program in Spanish. Students must apply and qualify, which is more likely when they enroll at the beginning of the year and exhibit strong academic skills in English ("They don't want students that are struggling already with academics in English to be placed in a class learning the academics in Spanish, because it just causes more difficulties," Elizabeth explained.) Fourth and fifth-grade students spend half the day in English-

medium classes and the other half of the day in Spanish-medium classes, whereas students from lower grade levels switch languages of instruction on a week-to-week basis. Teachers that instruct dual-language program students, even those who only teach the English classes, must also be able to speak Spanish. “Reg ed” teachers, however – like Elizabeth, who used this term to refer to “regular” education outside of the dual language program – sometimes do not speak any Spanish at all. ELs who either were not accepted to the dual language program or who never applied are still present within “reg ed” classes. For this reason, as at Middletown, paraprofessionals are also utilized for linguistic assistance.

Non-Participant Observations

Both non-participant observations took place on Friday, April 5, 2019. Middletown Elementary was the first school visited by the researcher: notetaking began at 9:15 am and continued until 10:40 am for a final duration of 1 hour and 25 minutes. Upon conclusion of the visit, the researcher traveled to Tuscarora Elementary, relatively close by, and began the second observation at 11:20 am. It ended at 12:10 pm, shorter than the first session due largely to the smaller size of the building, for a final duration of 50 minutes. Core emergent themes and their axial codes are descriptively presented in Tables 15 and 16 and described in this chapter; they are further synthesized and triangulated with Phase I data in Chapter 5. It is important to note that some axial codes have been cross-listed under more than one core theme due to their applicability to multiple contexts.

Table 15

Emergent Themes: Middletown Elementary Observation (Site A)

Core Theme	Axial Codes	Recorded Observations	Combined Total
1. Multilingualism	a. Monolingual (English) curriculum	3	10
	b. Lack of multilingualism	2	
	c. Bilingual communication: Displays	1	
	d. Spanish-speaking staff	1	
	e. Diverse student body	1	
	f. No translation of public displays	1	
	g. Extracurricular Spanish instruction	1	
2. Visual displays	a. Celebrating students	6	26
	b. Student work display	5	
	c. Inspiring students	4	
	d. Lack of display	4	
	e. Welcoming environment	3	
	f. Decorative	2	
	g. Clear presence of resources	2	
3. Pedagogy	a. Inconclusive note – possible linguicism	4	10
	b. Outside faculty familiarity with students and their abilities	2	
	c. Inconclusive note – possible teacher frustration	1	
	d. Specialized instruction	1	
	e. Student practice/pair work	1	
	f. Positive student/teacher interaction	1	
4. School description	a. Positive environment	3	9
	b. Strong security	1	
	c. Unconcerned staff/faculty	1	
	d. Large/spacious size	1	
	e. Willingness to be observed	1	
	f. Welcome reception	1	
	g. Accessibility of academic resources	1	
5. Monolingual resources	a. Lack of resources for parents/family	1	3
	b. Legal notification	1	
	c. Incomplete notification	1	
6. Culture	a. Celebration of multiculturalism	3	6
	b. Absence of cultural relevancy	2	
	c. Acknowledgement of culture	1	
		Total Coded Observations:	64

Table 16

Emergent Themes: Tuscarora Elementary Observation (Site B)

Core Theme	Axial Codes	Recorded Observations	Combined Total
1. Multilingualism	a. Bilingual communication: Staff speaking to parents/students	4	18
	b. Bilingual communication: Displays	3	
	c. Bilingual resources	3	
	d. Lack of multilingualism	3	
	e. Spanish-speaking parents and children	2	
	f. Bilingual instruction	1	
	g. Translation of public displays	1	
	h. No translation of public displays	1	
2. Visual displays	a. Celebrating students	5	15
	b. Inspiring students	3	
	c. Welcoming environment	2	
	d. Student work display	2	
	e. Lack of display	2	
	f. Clear presence of resources	1	
3. Pedagogy	a. Strategic planning and cooperation	1	2
	b. Inconclusive note – possible disorganization	1	
4. School description	a. Strong security	5	17
	b. Small size	4	
	c. Attentive staff/faculty	4	
	d. Welcome reception	1	
	e. Unwelcome reception	1	
	f. Positive environment	1	
	g. Accessibility of parent resources	1	
5. Bilingual resources	a. ESL support for families	2	5
	b. Familial involvement in school/community	2	
	c. Parental rights notification	1	
6. Culture	a. Absence of cultural relevancy	1	5
	b. Black History Month	1	
	c. Famous Black Americans	1	
	d. Student Art: MLK	1	
	e. Display celebrating diversity	1	
		Total Coded Observations:	61

Multilingualism

This category encompassed the largest number of axial codes at both sites, as it referred to any and all observations related to a language other than English being utilized for communicative purposes (whether verbally or via informational postings). Axial codes shared in common between Middletown and Tuscarora included: 1) Bilingual communication via displays, 2) Lack of multilingualism (in observed contexts where it may have been expected), and 3) No translation of public displays (again, where it may have been appropriate or expected). Other emergent themes differed slightly from one another, as Middletown did not translate public displays on any recorded occasion, nor did they make any bilingual resources immediately accessible to parents or students.

One of Middletown's most apparent characteristics, as presented by Table 15, was its completely monolingual environment. As is further detailed in Chapter 5, the researcher did not observe instruction or student-teacher interaction in a language other than English. Cafeteria staff were overheard speaking in Spanish, but all students and faculty spoke English in both social and academic situations. This is not a positive or a negative finding, but it is interesting when considering the high percentage of ELs at the school. The racially and linguistically diverse student body was made especially apparent on one occasion during which the researcher noted the names of kindergarten students displayed next to an art display: twelve of the seventeen names displayed appeared Portuguese or Spanish in origin, though it is impossible to know for sure whether this reliably correlated to the L1 of the students. The only indication of a bilingual display was one translated label for "classroom" on one teacher's door. Finally, though the teacher interviewed from Middletown indicated that Portuguese was the most prevalent L2 spoken by ELs, a PowerPoint display in English advertised an extracurricular Spanish class after

school on Mondays. It was unclear whether this was supplementary instruction for students studying Spanish or if it was open to anyone from the community interested in taking the course.

At Tuscarora, observations coded as "lack of multilingualism" were generally related to the oral language overheard by the researcher. Despite the existence of the dual language program at the school, students in the cafeteria during a busy lunchtime all seemed to be speaking English. Later, at recess, the same was true about the groups of children outside playing. The final observation recorded within this axial code was that all displays in the locked library, as seen through the window (consisting of a couple of book posters and images encouraging students to read) were in English; that is not to say, however, that there were no curricular materials in Spanish, as there almost definitely were due to the necessity of providing resources for the dual language courses. Teachers were witnessed speaking in Spanish to students on two different occasions, and office staff communicated with Spanish-speaking parents during what appeared to be at least one positive interaction. There were also multiple bilingual displays on the walls, including an image of the cover of Charlotte's Web translated into Spanish.

Visual Displays

Middletown and Tuscarora shared the following axial codes in relation to their visual displays: 1) Celebrating students, 2) Inspiring students, 3) Student work display, 4) Welcoming environment, and 5) Clear presence of resources. However, at Tuscarora, the presence of these previously stated resources was more substantial: many copies of bilingual, informational brochures and flyers were made immediately available to parents in the front office, which were not at all present at Middletown. Materials coded as "resources" at Middletown instead consisted of an automated PowerPoint slideshow in the cafeteria displaying news and upcoming events as

well as a USDA-sponsored sign on the wall regarding the prohibition of discrimination. Both sites prominently displayed student artwork on the walls, though the axial code "lack of display" arose in Middletown due to the strange, almost abandoned sense of emptiness of some of their upstairs hallways; it is possible, however, that these spaces were in a transitory period. Tuscarora had a similarly barren cafeteria and few postings within their library, though the remainder of the school was beautifully decorated.

Though there were multiple displays of student work at Middletown, both artistic and academic, the most inspiring – as well as the only one at either site to explicitly celebrate student diversity – was an enormous American flag constructed of small pieces of red, white, and blue paper, each of which included a student's description of the country they were originally from and a personalized drawing: it was entitled "One School, Many Cultures". Quickly noted were South Korea, Russia, Venezuela, China, Brazil, and Mexico, though others were included as well. Student-made brochures in front of a fifth-grade classroom also presented information about various countries around the world, including information about traditional clothing and food. In a first-grade hallway, art on the wall – drawn on premade worksheets – showed student depictions of Nigeria's flag accompanied by basic facts and statistics. The over-arching sense of a welcoming environment was established by positive signs and affirmations. Most notably, a five-foot paper tree on one wall in the front lobby, called the "Kindness Tree," was full of green paper leaves proudly describing instances in which students had exhibited kindness to their classmates.

Tuscarora's lobby has exceptionally high ceilings, as they accommodate its main staircase. Faculty used this cavernous space well, and presented impressive visual art created by students in a gallery-like exhibition. There were also touching teacher-produced tributes to their students within three separate classes in one upstairs hallway, demonstrating the possibility of

teacher collaboration to decorate their shared space in this way. Underneath quotes that proclaimed things such as “I can do it!”, “Never underestimate yourself,” and “I believe in me,” there was a chalkboard upon which students wrote why they believed in themselves. Next to this chalkboard, individual photographs were accompanied by written messages from the instructors of three separate classes about why each of their students were superstars.

Pedagogy

Since the researcher did not enter any of the classrooms to watch lessons as they were conducted, pedagogical observations were a bit rarer than those previously described. At Tuscarora, only two coded notes were taken. One of these was an inconclusive finding (indicated as possible disorganization, though no one was obviously at fault); one teacher was standing beside her open classroom door, looking unhappy and as if she were impatiently waiting for someone. Her students sounded as if they were playing a game without her supervision – it was loud and boisterous. She looked relieved to see the researcher and immediately assumed she was the substitute teacher, who was evidently late to arrive. Aside from this one incidental occurrence, the only other direct observation of pedagogical procedures at Tuscarora involved noting a classroom specially designated for teacher planning. It was in active use, as around six teachers were working together during a break period.

Pedagogical observations at Middletown were similarly mixed. To begin with the positive, the researcher was able to sit in the library and watch as what appeared to be two classes of third or fourth-grade students checked out books and then sat to read collaboratively with their peers (coded as “student practice and pair work”). The librarian scanning the selections seemed very familiar with the children; on one occasion, she told a student to go back and return the book she had chosen because she knew it was below that student’s reading level.

She provided suggestions and advice to each student as they came forward, and the children seemed to enjoy speaking with her about reading. However, another occurrence that day proved a bit concerning to the researcher. While walking past one open classroom door, eye contact was made with a teacher midway through a lesson about language. The researcher paused, curious about what would be said, and the teacher nodded silently in approval for the researcher to stay in the hallway and listen for a few minutes. Detail and context as to what was overheard is further provided in Chapter 5. Ultimately, however, an evidently well-intentioned, kindly teacher was explaining how her students needed to learn English so Americans would not become frustrated trying to understand them. This was recorded as an instance of possible, if not outright, linguicism (or discrimination on the basis of language rather than race; Liggett, 2014).

School Description

This code was simply dedicated to the generalized notes about each site recorded by the researcher not immediately applicable to any other thematic category. Strong security measures at Middletown made it impossible to simply walk into the office; being buzzed in was necessary to gain entry. Staff were pleasant, relaxed, and welcoming. The vice principal provided the researcher a map of the school, and the observation was then conducted without any teachers or members of the faculty stopping to ask about the process or for the identity of the researcher. Positive interactions between students and teachers were noticed in the hallway.

Tuscarora's observation began in much the same way – front desk workers buzzed the researcher in the door in order to gain entry to the school. There were additional security measures in place as well, such as a large fence outside that blocked outside entry to portables (which had been accessible to the public at Middletown). Though faculty were still friendly, there was an immediate difference in their level of attentiveness when compared to how faculty

had behaved at Middletown. The researcher was stopped four separate occasions during the 50-minute observation by teachers asking if they could help with anything. In one case, the researcher felt unwelcome by the response of a teacher in the hallway, who frowned and declined a later interview when asked. Just minutes later, however, another instructor happily agreed to participate.

Resources: Monolingual (Middletown) and Bilingual (Tuscarora)

The availability – or lack of availability – of resources for parents at both sites has already been largely addressed by the first core theme of multilingualism. Due to the importance of providing assistance and information to all members of the school community, however, this theme has also been independently listed. Tuscarora's wealth of bilingual pamphlets and flyers in the front office was in stark comparison to Middletown's non-existent provisions. Though there were a few flyers on Middletown's walls that said, "YMCA and After-School Programs," the space below this heading was blank in all observed cases with no additionally-provided information about which after school programs were being offered.

Culture

Culture is another emergent core theme that has been partially discussed above in relation to the visual displays decorating the walls of each school. Middletown made clear efforts to address and celebrate their multicultural student body; however, an absence of cultural relevancy was still noted due to their library's lack of a multicultural section and books in different languages. The Sunshine State Reader book titles (though not featured at Tuscarora, the selections are the same across the state of Florida) appeared similarly monolingual and monocultural; this was not the fault of the school or the district but rather the state. Selections

also change on a yearly basis and may have been – and may be – more inclusive in previous years and in those to come. Finally, while cultural elements were not clearly represented within Tuscarora's walls, there were four displays related to Martin Luther King, the celebration of diversity, and Black History month that had lasted from February and into April. Race and culture, while not synonymous, certainly overlap in their implicit requirement to acknowledge and respect human diversity.

Practitioner Interviews

The first interview was conducted prior to either of the site observations on Sunday, March 10, 2019 with a second-grade teacher at Middletown Elementary; the phone conversation, recorded using the smartphone application "TapeACall Pro," lasted for 20 minutes and 2 seconds. Vanessa, a pseudonym assigned by the researcher in order to ensure confidentiality, explained that she was in her third year of teaching and her second year within the district (*Frederick County*). At the time of the interview, she was enrolled in a master's degree program in Curriculum Leadership. She completed the required ESOL coursework to receive endorsement during her previous educational degree program and did not, therefore, take the district's online ESOL classes. She cited herself lucky to have received the opportunity to learn ESOL strategies directly from professors. Vanessa had five ELs in her class out of eighteen at the time of the interview, though she said that this number had been much higher – twelve – the year prior.

The second interview, also conducted over the phone and recorded using the same smartphone application, took place on Wednesday, April 10, 2019 with Elizabeth (pseudonym), a third-grade teacher at Tuscarora Elementary. The conversation lasted for 15 minutes and 28 seconds. Because Elizabeth taught at a school with a dual language education program in Spanish, she felt it necessary to explain that she did not speak any additional languages. She

taught the “reg ed” courses, or classes within the monolingual English program. Despite this, however, she still had two ELs in her class at the time of the interview, though she had taught higher numbers of ELs in prior years. Elizabeth obtained a degree in Early Childhood Development a few years before the conduction of the interview; immediately afterwards, she taught for a year and a half at a private preschool. She then came to Tuscarora. 2019 marked her third year at the school, and she had taught third grade for the entirety of her employment there.

Appendix D includes the interview protocol utilized by the researcher, which consists of all of the main questions directed at the participants. Tables 17 and 18 report the emergent themes and axial codes from all transcribed interview data, which are subsequently contextualized and explained. As with observational data, some axial codes were cross-listed across core categories due to their applicably to multiple contexts.

Table 17

Emergent Themes: Practitioner Interview (Site A)

Core Theme	Axial Codes	Recorded Instances*	Combined Total
1. District ELL Plan	a. Lack of familiarity	3	5
	b. Lack of availability	2	
2. School/program information	a. Pedagogy: difficulty and accommodations	7	19
	b. Compliance requirements	4	
	c. ESOL support at school: lack of help	3	
	c. School demographics	3	
	e. Testing procedures	1	
	b. ESOL support at school: resources	1	
	f. Faculty detail	1	
3. Mentions of bilingualism	a. Bilingual staff	4	4
4. Training and PD	a. PD available but not offered upfront	4	12
	b. Required ESOL coursework	2	
	c. Compliance requirement	2	
	d. Lack of in-service PD	1	
	e. PD focused on other areas	1	
	f. Lack of cultural training	1	
	g. Critical opinion about PD	1	
5. Culture and curriculum accessibility	a. Critical opinion about accessibility	2	5
	b. Multicultural school environment	1	
	c. Multicultural event/celebration of diversity	1	
	d. Lack of PD on culture	1	
6. Translation resources	a. Assistance of bilingual coworkers	3	5
	b. District-provided paraprofessionals	2	
7. Parental communication	a. Parental notification	2	5
	b. Positive opinion about communication	2	
	c. Parental involvement	1	
8. Teacher opinions	a. Critical opinion about PD	3	13
	b. Critical opinion about curricular standards	2	
	c. Critical opinion about ESOL support	2	
	d. Opinion about teaching difficulties	2	
	e. Positive opinion about ESOL resources	2	
	f. Opinion about teacher initiative	1	
	g. Positive opinion about translation resources	1	
		Total Coded Observations:	68

*Some inclusions have been cross-listed over more than one relevant category.

Table 18

Emergent Themes: Practitioner Interview (Site B)

Core Theme	Axial Codes	Recorded Instances*	Combined Total
1. District ELL Plan	a. Lack of familiarity	3	4
	b. Lack of availability	1	
2. School/program information	a. Dual language program details	8	15
	b. ESOL support at school	2	
	c. Pedagogy: planning and materials	2	
	e. School demographics	1	
	b. Compliance requirement	1	
	f. Compliance issues	1	
3. Mentions of bilingualism	a. Bilingual staff	2	4
	b. Dual language requirement for teachers	1	
	c. ESOL perception	1	
4. Training and PD	a. Lack of in-service PD	3	12
	b. PD available but not offered upfront	2	
	c. Suggestion for changing PD	2	
	d. Positive opinion about PD	2	
	e. Critical opinion about PD	1	
	f. Required ESOL coursework	1	
	g. Compliance requirement	1	
5. Culture and curriculum accessibility	a. Inaccessible curriculum	2	5
	b. Differing accessibility by grade level	1	
	c. Inability to relate to all students	1	
	d. Use of curricular adaptation	1	
6. Translation resources	a. Assistance of bilingual coworkers	1	3
	b. Google Translate; phones	1	
	c. District resources not yet utilized	1	
6. Parental communication	a. Difficulty communicating	3	4
	b. Positive communication experience	1	
7. Teacher opinions	a. Positive opinion about PD	2	6
	b. Critical opinion about PD	1	
	c. Opinion about parental communication	1	
	d. Positive opinion about ESOL	1	
	e. Positive ESOL perception	1	
		Total Coded Observations:	53

*Some inclusions have been cross-listed over more than one relevant category.

District ELL Plan

The provision below, regarding access to policy, was delineated by Frederick's 2016-2019 District ELL Plan:

> District ESOL Compliance Specialists, District ESOL Instructional Coaches, ESOL Resource Teachers, District Parent Liaisons, the school ELL Committees, and ESOL Paraprofessionals all have access to the ELL Plan and will help ensure full implementation at the school level. (*Section 7: Compliance of ELL Plan and Student Performance*).

Before delving into the emergent themes that arose during the open coding and axial coding process, however, it is critical to note that, despite the above statement, neither teacher had ever heard of the District ELL Plan. This fact threw a bit of an unexpected complication into the study; the researcher no longer had the option to ask about how policy impacted practice.

The following exchange occurred between the researcher and Vanessa, from Site A (Middletown):

> Researcher: Are you familiar with the 2016-2019 District ELL Plan for your county?
>
> Vanessa: I am not.
>
> Researcher: One of the questions was if copies were available for instructors, so…
>
> Vanessa: Nope. (laughs) That's not the one where you, it's like, you need your ESOL to teach?
>
> Researcher (after providing additional context): Is it [the District ELL Plan] something you think ESOL teachers would have access to?
>
> Vanessa: No.
>
> Researcher: So you haven't heard anyone mention it?

Vanessa: No.

The second interview with Elizabeth contained a similar conversation. It is important to again note that neither school employs ESOL teachers, only paraprofessionals; all teachers are ESOL-endorsed and therefore expected to be knowledgeable of EL-related procedures. Teachers also serve on ELL Committees.

Researcher: Is it [the District ELL Plan] something you're familiar with?

Elizabeth: (brief pause) No, actually, I'm not. I'm sure if you talk about it I'll probably have some understanding of it, but it's not something we…

Elizabeth then wondered aloud, as Vanessa had, whether the ESOL endorsement requirement established by the state of Florida after the 1990 Consent Decree, which she was familiar with, was one in the same document; after the researcher explained further, however, she confirmed that she had never heard of the 2016 District ELL Plan, nor had she seen it distributed at the school to any other faculty members.

School and Program Information

Some of the details of each site and their offered programs have already been described; they included the specifications of Tuscarora's dual language program, explained in-depth by Elizabeth, as well as demographic information regarding the students. Both teachers, however, also touched upon a few aspects related to compliance with ESOL endorsement measures. Vanessa stated that parents were sent notification letters when the teachers of their children had not completed the training requirements. She also described how the dean of the school was particularly attentive, frequently reminding faculty to enroll in the online coursework. She did confirm that lesson observations were conducted by unspecified, higher-level officials focused upon alignment with state standards. Apparently, they were particularly concerned with

accommodations made for ESOL and ESE (Exceptional Student Education) students. Elizabeth similarly mentioned frequent reminders to teachers to complete the required ESOL training but did not describe observations like those explained by Vanessa. Instead, she answered the researcher's question about compliance measures – inquiring whether there were observations or routine check-ins – by stating the following:

> No, and that's actually something my team and I have been discussing. Because we are required to, like… more for our ESE kids, we're required to track everything that we do and any accommodations we provide for ESE and ESOL. But it's just like a bunch of checks, and it's so easy for teachers to, you know, check off that they're doing it, but no one's actually checking to see if teachers are using these different ESOL strategies or ESE strategies.

Pedagogy and ESOL support were also touched upon by both instructors, though Vanessa expressed more frustration than did Elizabeth about the lack of assistance offered. Though she acknowledged that Middletown made ESOL resources available to those who sought help, she was critical of the paraprofessional meant to be assisting her in the classroom. A para was only required to come once a week, and Vanessa explained that the visits were rarely more than a half an hour. "Now that fluctuates… (laughs). Their schedule. So my para hasn't come in probably two months. Probably since winter break." Conversely, Elizabeth did not see a need for a paraprofessional in her class – despite confirming that they came frequently to other teacher's classes – because she did not have any students that were "strictly Spanish-speaking". In her view, because her ELs could understand English, there was no necessity for supplementary linguistic support. This was a conception about ESOL that was a bit confusing to the researcher, as informal English fluency (BICS) is certainly not the only indicator of linguistic proficiency (Cummins, 1979).

Elizabeth explained that teachers at Tuscarora frequently planned together (the planning room she described was also previously noted by the researcher during observations) and strayed away from the district's provided curriculum, as they were granted the freedom to do so. Resources were shared across subject areas in order to ensure consistency of instruction. She did not describe ESOL instruction in much more detail. Vanessa also stated that teachers within her grade level worked to make the curriculum more multicultural and accessible, though she was not sure about teachers from other grade levels. All assessments at Middletown, however, were described as being adapted for ESOL students. Despite these positive steps, however, she saw a few problems with the overall support offered at her school.

> A lot of teachers in my school are always questioning, like, 'What do I do with my ESOL kids?' Like, 'What do I need to do?' (…) Those teachers don't really know strategies for helping their EL kids. And they- the kids just kind of… are there. Which is sad.

Mentions of Bilingualism

Bilingual staff were mentioned as being present at both Middletown and Tuscarora. Vanessa indicated that all hired paraprofessionals spoke Portuguese, the most commonly spoken language of ELs at Middletown, and that they also translated most of the major letters sent home to parents. The vice principal, an L1 Spanish-speaker, also provided translation services when necessary; she stated that they easily found other people to speak any additional languages when it was required. Vanessa does not fluently speak Spanish or Portuguese, though she is able to understand some of what is said by students and parents and hold basic conversations.

At Tuscarora, Elizabeth asserted "Almost everybody here is Spanish-speaking"; she was one of the few not to be bilingual at the school. She described herself as easily able to ask her coworkers to translate letters sent home to parents, though expressed regret that she herself was

not able to personally communicate with them. A requirement of Tuscarora's dual language program is that all teachers within it – including those who only teach the English classes rather than the Spanish ones – need to be bilingual. "They only teach in English, but they still have to speak Spanish to support those kids like in any other way," she explained.

Training and PD

Both teacher's responses to interview questions regarding the PD were very similar, likely due to the fact that most PD offered is at the district level. They both described the necessary online coursework that teachers must complete; however, neither felt as if ESOL PD was something considered important by their district. Vanessa claimed there was no "real push (…) to learn more or get more knowledge or skills for teaching ESOL"; she said that Frederick County's current focus was upon close reading instead. While ESOL courses are always technically available to those who ask, they were not offered upfront. Elizabeth agreed with this sentiment, explaining "If you ask for it, they'll give you those resources. But it's not something that they're, um… they're just presenting *beforehand*, you know what I mean? If you're not seeking it, to be able to get it." She postulated that more training may have been offered to teachers within the dual language program, but was not entirely sure: "They might, yeah [receive more support]. But it would make sense for everyone to attend those types of trainings."

Neither teacher had attended a PD session dedicated to ESOL during their time as teachers within Frederick County, nor had they ever seen any advertised courses dedicated to multicultural awareness. They also had mixed opinions about the training courses required of teachers. Elizabeth, who received her endorsement online, felt the online sessions were "professional and very beneficial". Vanessa, however – who, as a reminder, had completed her endorsement within the classroom at her previous university – thought they were insufficient.

"Just requiring teachers to take a course online, they don't really learn a lot. Like, with these courses online, they're just trying to, you know, get through it."

Culture and Curriculum Accessibility

In relation to the theoretical framework of this study, CRP, both Vanessa and Elizabeth seemed aligned in their perceptions. Neither of them felt as through the district adequately addressed multicultural topics within the given curriculum, though Elizabeth said she felt lucky that the third-grade Social Studies standards did cover various regions of the world. "But in other grades, you don't- They're not always like that. So it's harder to find it [culturally-relevant material]." She immediately replied, "Well *definitely*, yeah!" when asked whether issues ever arose with course subjects being inaccessible to ELs. "If you go by what the district tells you to do," Elizabeth argued, "then it's not going to be… like, the students are not going to be able to relate culturally to it. But if you stray away from your own resources, which we're allowed to do, then you can always find different things for the students to understand."

Vanessa expressed sympathy for ELs, as she perceived them as frequently confused by the presented content. "I feel like it's just not- What the district gives us, and what the school does, isn't very accommodating to them. Um, and I feel for them." She did, however, say that culture was an aspect that teachers within the school – outside the district's explicit requirements – frequently emphasized, as the students came from so many diverse countries. Middletown had, at the time of the interview, recently hosted a multicultural day where the students brought in information about their home countries. Vanessa also felt that teachers within her grade level made a genuine effort to incorporate these types of activities into their lessons.

Parental Communication

In an attempt to explore whether policy provisions for parental communication were evident in practice, the researcher asked both participants about the procedures conducted at their schools. Vanessa's responses were very positive. After describing the letters sent home on various different occasions to parents, she further explained that the assistant principal called homes "once or twice every week" with announcements to parents in English and Spanish. She did acknowledge, however, that there was not yet a faculty member able to do the same in Portuguese, the dominant L1 spoken by ELs; despite this, her overall sentiment was as follows: "I feel like the school does a really good job reaching out to those parents in the languages that they need." Vanessa ultimately described Middletown as placing value on parental involvement as well as "very responsive" if parents ever needed anything from the school.

Elizabeth was less effusive with her replies, expressing regret that she was not able to form a personal relationship with the parents of her ELs due to the language barrier between them. She felt that parents bypassed her as an option whenever they needed help due to her inability to speak Spanish; in her view, they would go to anyone else in the school before trying to contact her. In reference to the family of one of her ELs, she sadly explained that she had not been able to contact them all year. "Because every time I call, they say they don't want to talk, and they hang up. And they did say in Spanish, like I understand a little, that they still want to talk."

Credibility Techniques

Though Chapter 3 also detailed the following credibility techniques, they have been included again here to accompany the presented results as a reminder of the measures taken by the researcher to ensure the suitability of all study procedures.

The collection of multiple forms of data across Phases I and II was a form of cross-method triangulation (Denzin, 1978; Hitchcock et al., 2005; Patton, 1999), helping to ensure internal validity, whereas the collective case study (CCS) approach utilized in both phases assisted in confirming the dependability of the results (Stake, 1995). For Phase I, techniques to promote the trustworthiness and dependability of the results were utilized. Two content experts on the dissertation committee first reviewed the a priori code selections with the researcher before data analysis during a peer review process. Next, in order to verify the internal validity and transferability of the instrument, these committee members independently coded one of the district policy documents so the frequencies they recorded could be compared to one another and to the researcher's first attempt (Ryan & Bernard, 2003). Having more than one outside expert code the document allowed for triangulation of the codes through the confirmability technique of intercoder reliability; this process also helped reduce researcher bias and confirm objectivity (Lombard, Snyder-Duch, & Campanella Bracken, 2006). The resulting three sets of frequencies, though the numbers did not completely match, created trend lines with the same patterns across the codes when subsequently graphed. This indicated that all researchers ultimately came to the same conclusions – with proportionate differences between each frequency – despite the variance in exact numbers.

For Phase II, member checking at the end of each interview was conducted to ensure an accurate portrayal of interviewee thoughts, beliefs, and opinions; this was a form of participant validation of data (Creswell & Miller, 2000). Member checking involves reviewing what was understood by the interviewer at the end of the conversation and inviting the interviewee to provide clarification, rephrase or retract a statement, or to include additional elaboration when necessary. Furthermore, the questions asked by the researcher were intended to be unbiased and not to lead the interviewee in any one direction when answering. It was emphasized that there

was no “desirable” answer and that positive, negative, and even neutral responses would prove useful. Thick-rich contextual descriptions accompanying both phases of the research assisted in describing the potential transferability of the results to other situations and research settings.

Finally, Chapters 3 and 4 included an audit trail of all researcher actions and processes undertaken during the data collection and analysis processes in order to confirm reliability.

Summary of Results

This chapter began with a brief review of the mixed-methods approach taken by the researcher and a reiteration of the research questions. It was then divided into two parts dedicated to Phase I and Phase II of the study. After presenting the gross totals of all frequencies recorded across the nine research-based a priori codes, Phase I’s findings were organized into sections that further broke down the coverage of each a priori code’s unique provisions within the 2016-2019 ELL Plans. Each section contained a frequency table to report coding results, when necessary, as well as thick-rich description of the various recorded policy inclusions and how they compared across school districts. Additional findings presented for Phase I included the bilingual education practices of each district in the sample as well as a comprehensive report of which languages were explicitly mentioned as being supported in some way within schools. Phase II’s findings similarly consisted of frequency tables that presented the core emergent themes and more specific axial codes from observational and interview data. Thick-rich descriptions were centered around each theme, providing summaries of what was discovered by site and including brief comparisons between the two.

Phase I results showed that, while CRP was most definitely present within the Florida school district ESOL policies in the variety of contexts represented by the nine a priori codes, there was no uniformity or consistency in the answers provided by each district to the FLDOE’s

prompts. The number of total included frequencies across all CRP codes ranged dramatically from 203 (Worcester) to 73 (Charles; Table 6), and the lengths of the policy documents were similarly disparate; Worcester's ELL Plan was twice the length of Charles' and Cecil's (Table 5). Some districts made exceptional provisions in relation to cultural and linguistic support for students and their families whereas others cannot be said to have done the same, at least not within the particular policy document coded by the researcher. Especially lacking across all plans were policy stipulations relative to PD sessions focused upon multicultural communication and awareness (Code 1), mentions of diverse curricular resources (Code 3), a focus upon student respect and behavior (Code 5), cultural backgrounds of school faculty and staff (Code 8), and expressions of value for diversity and multiculturalism (Code 9). Though distributions of frequencies amongst all other codes were uneven, most districts addressed at least one or more of the inclusion criteria for each of them.

Phase II, consisting of observational and interview data, demonstrated both similarities and differences between the observed and reported practices within the two Frederick County schools purposively sampled by the researcher. Observational data allowed for at least a superficial view of each school's daily procedures, all of which were further contextualized by more detailed interview data. Site A was a monolingual school with an entirely English curriculum whereas Site B had a dual language program in Spanish. Perhaps expectedly, the researcher noted more instances of multilingualism at Site B. Despite this, culture seemed more strongly celebrated at Site A than at Site B. It is unclear as to why this was the case, but it seems to be that the teachers at Middletown were intrinsically motivated to emphasize multiculturalism and discussed ways as to how this could be done amongst themselves. There was no mandate to do so, and perhaps the teachers of Tuscarora never had a similar initial burst of inspiration. Interview data provided perhaps the most notable finding from the study, however: neither of the

teachers interviewed for the study had ever heard of the 2016-2019 District ELL Plan, nor, to the extent of their knowledge, was it made available to faculty at either school. As this study was concerned with the effect of policy on practice, it was worrying to discover that the ESOL policy documents extensively reviewed for Phase I may not have any direct bearing on school-level decision making. Both teachers cited both positive and negative opinions about PD, curriculum, parental communication, and other matters of interest to the researcher.

Ultimately, there was little uniformity across the board – represented by the findings of Phase I and Phase II – with regards to district and site-based practice. Chapter 5 synthesizes the findings presented in Chapter 4 as well as discusses them in the context of fidelity of policy implementation.

CHAPTER 5
SUMMARY, DISCUSSION, AND CONCLUSIONS

Introduction

This research study includes five chapters. Chapter 1 introduced the background and context of the study's goals, which were expressed in two research questions that each represented a separate phase of data collection and analysis. The theoretical framework of CRP was described. Next, a brief review of the mixed-method approach taken by the researcher was provided. Chapter 2 consisted of a comprehensive literature review intended to justify the necessity of looking more closely at cultural sensitivity, teacher training, and ESOL-related policy within this nation's schools. Sources included within the literature review highlighted the clear lack of procedural consistency across the United States, the frequent presence of racism, bias, and linguicism in schools, and the need to carefully consider the unique needs of ELs in the classroom. Chapter 3 then provided a detailed account of the methodology – including instrumentation and data analysis procedures – employed by the researcher during the duration of the study.

Chapter 4 included all results obtained from data analysis. For Phase I, which was a critical policy analysis, frequency totals for each of the nine a priori codes as they appeared within the twelve 2016-2019 District ELL Plans were reported. Six of the nine codes were subsequently broken down into their smaller and more specific inclusion criteria. These criteria were pre-determined by the researcher as representing a practice relevant to its larger code. Patterns, observations, and occasional researcher interpretation accompanied each of the codes, frequencies for which were compared across the twelve purposively-sampled Florida school districts (all assigned pseudonyms) and paired with thick-rich descriptions. For Phase II, emergent themes and their more specific axial codes from site-based observational data and

practitioner interviews were described. Tables for each of the two elementary school sites displayed these themes, their corresponding axial codes, and the frequencies for which relevant instances of the codes were heard and/or observed by the researcher. All findings were contextualized within the theoretical framework of CRP.

Chapter 5 contains a review and discussion of the findings presented in Chapter 4, including researcher conclusions and implications for pedagogical practice and future policymaking within the field of ESOL. Phase II findings are critically compared to the Frederick's 2016-2019 ELL Plan in order to evaluate the fidelity of policy implementation. Relevant connections are also drawn between data from Phase I and Phase II in order to synthesize results from both stages. Finally, recommendations are made for future research that could potentially build upon the foundation established by the present study.

Summary of Study

This mixed-method, two-part critical policy analysis and collective case study (CCS) first involved the collection and comprehensive coding of twelve 2016-2019 District ELL Plans belonging to Florida school districts that enrolled high numbers of ELs for inclusions of culturally responsive practice (Phase I); the researcher then utilized the ethnographic techniques of non-participant observations and semi-structured practitioner interviews to qualitatively explore the impact of policy on pedagogy and institutional-level procedures, to identify additional emergent themes and patterns, and ultimately to assess the extent of policy fidelity as reflected in daily practice (Phase II). Throughout Phase I, the twelve purposively-selected districts in the sample were compared to one another in order to gauge consistency as well as to identify any evident disparities between them. For Phase II, the two elementary school sites, both located within the same district, were similarly compared.

Research supports the necessity for this sort of descriptive, exploratory study. Public schools in the United States are universally struggling to meet the needs of an ever-growing population of ELs, and these failures are reflected in academic achievement statistics: 25% of ELs are not making progress toward English language proficiency (Gollnick & Chinn, 2016), and the high school graduation rate for ELs was about 57% in 2014 in comparison to 79% for all other students (Stetser & Stillwell, as cited in Gollnick & Chinn, 2016). Despite the evident need for increased attention and support, the sociocultural needs of elementary ELs are not widely represented in current educational research, particularly not with the intent of exploring the impact of environment on learning. Motha (2006), Salazar (2008), and Talmy (2009) all identified disturbing instances of damaging viewpoints and perspectives in their ethnographic, school-based studies that denigrated and devaluated the home languages and cultures of students. These viewpoints, firmly rooted in preconceived notions of ESOL and deeply-engrained biases, directly impacted both the pedagogical approaches of teachers (Motha; 2006; Talmy, 2009) and school-based procedures carried out by staff and administrative faculty (Salazar, 2008).

In terms of policy, research has shown that it frequently leaves out aspects related to cultural diversity and language development, instead mainly focusing on the technicalities and minutiae of required procedures (Samson & Collins, 2012). In addition to the dangers that can come with the misinterpretation of often confusing policy documents and the commonly-cited lack of practitioner understanding (Malen & Knapp, 1997; Spillane, 2004), there is also a general absence of teacher training in areas related to bias, institutional racism, and self-reflection nationwide (Allen et al., 2017; Bartolomé, 2012; Mitchell, 2019). Critically exploring policies established by school districts within the theoretical framework of CRP can therefore allow researchers to identify and understand the origin of the cultural and environmental obstacles that stand in the way of best meeting the needs of ELs across the country.

The following two research questions, representing Phase I and Phase II, guided the data collection and analysis procedures:

1. In what ways, and to what extent, do ESOL policies in twelve criterion-sampled Florida school districts address culturally responsive best practices as described in the literature? (Phase I)
2. In a smaller purposive sample of two elementary schools within one of these Florida school districts, in what ways, and to what extent, do the observed and reported practices of each reflect fidelity of policy implementation? (Phase II)
    a. What kind of procedural similarities exist between these two selected schools?
    b. What kinds of procedural differences exist between these two selected schools?

Discussion of Findings: Phase I

A critical analysis of 2016-2019 District ELL Plans comprised Phase I of the study, which gauged the extent to which CRP was focused upon within Florida school district ESOL policies. The researcher sought to paint a metaphorical picture of which central aspects of CRP were both present and absent from these plans by compiling frequency tables to display the results of the a priori coding process. In order to do so, each policy document was printed and manually highlighted using different colored markers; each marker color represented one of the nine research-based codes (see Table 1; Appendix C). All districts were assigned pseudonyms.

Once all documents had been thoroughly reviewed and all relevant instances of CRP by code had been highlighted, the coded excerpts were transcribed under their corresponding categorical headers (the a priori codes) in a Microsoft Word document. One Word document was

created for each of the twelve districts. All typed phrases were then counted. Table 6 reported initial frequencies for all nine codes for every district before the subsequent – and more detailed – analysis of each was conducted. Next, each of the twelve Microsoft Word documents (containing a header for each code and relevant, counted inclusions under each) were printed. For the a priori codes that included additional inclusion criteria (all except 6, 7, and 8), the researcher determined to which discrete criterion each transcribed phrase pertained. The number corresponding to that criterion was then written by hand next to its corresponding phrase. For Code 4 (*Establishment of a relationship between the school, students, their families, and the surrounding community*), many excerpts were pertinent to multiple criteria and were therefore cross-referenced. Again, numbers for the inclusion criteria within each code were counted and reported in frequency tables (Tables 7-12). Like Table 6, all districts were represented; however, each table now only pertained to one a priori code. This allowed the researcher to analyze which aspects of a broader topic were touched upon and which were absent. The tables also facilitated the composition of more in-depth, thick-rich descriptions of each separate set of results.

Research Question 1: In what ways, and to what extent, do ESOL policies in twelve criterion-sampled Florida school districts address culturally responsive best practices as described in the literature?

The first important finding came before the study had even started. Two districts, Calvert and Wicomico, had inaccessible policies, at least with respect to the efforts of the researcher to locate them online. As the 2016-2019 ELL Plans are required to be available to parents and practitioners – Calvert's plan, in fact, stated "Parents can access the ELL Plan through the district's website under Multicultural Education Department" – it was a worrying surprise to the researcher that they were unable to be found. It is possible that they were made available to

teachers and parents at sites within the district, perhaps via the front office, so no definitive conclusions can be drawn regarding the prevalence of the policies and their respective impact within both districts. An official from Calvert ultimately replied to an emailed request from a dissertation committee member for the document, enabling it to join the study sample, but there was never a reply from Wicomico officials. This led to its exclusion from the study. Both of these situations also presented the unanticipated problem of inaccessibility. If a researcher was not able to locate either policy after extensive searching, it is questionable whether parents and teachers, individuals directly impacted by policy provisions, are able to do so. Regulations such as those outlined by the 2016-2019 District ELL Plans are meant to be read and followed, which cannot happen if they are unavailable.

During data analysis, reported frequencies of coded inclusions clearly indicated that there was little consistency across district policies. Totals by district ranged dramatically from 203 (Worcester) to 73 (Martin), implying to the researcher that corresponding practices across the state differed in a similarly dramatic way. As the research questions called for an exploration of CRP as well as for a comparison of site-based procedures, the disparate frequencies reported by Table 6 proved that CRP was unequally represented across the board (Research question #1) as well as hinted that interview and observational data would reveal differences between both schools (Research question #2). Despite this, all nine best practices were present in at least one policy document. While it cannot be known if efforts to include CRP in policy were conscious or incidental on the part of policymakers, it is nevertheless encouraging that many of the criteria were fairly well-represented. Code 6 in particular (*Multiple forms of assessment for students to demonstrate their knowledge*) was adequately addressed by all districts; because of this, the researcher instead chose to highlight the inconsistencies in cited examination formats in a comprehensive table included in Appendix H. While each district cited at least 14 discrete forms

of assessment, both formal and informal, explicit evaluations of student socialization and adaptation were notably absent. Only Talbot included social experience as a valuable observational tool, and only Carroll cited student behavior (including study habits and attendance) as a potential indicator of student progress and ability. The sheer number of formal assessments mentioned across all districts also highlights the emphasis currently being placed upon standardized testing in the United States (Franquiz & Salinas, 2013). Assessing proficiency over development comes at the expense of understanding the complex learning, socialization, and acculturation processes undertaken by students as they acquire an L2 (Bailey & Carroll, 2015).

Most critically lacking, however, were Code 3 (*Provision of diverse curricular resources that portray individuals from different backgrounds*, appearing four times across all twelve documents), Code 5 (*Promotion of mutual respect among students*, appearing just once), and Code 7 (*Availability of staff from similar cultural backgrounds*, appearing twice). These codes were therefore not accompanied by frequency tables in Chapter 4. Furthermore, no one site included all of the codes, meaning that – when zooming in rather than looking at the larger picture – there was little comprehensive coverage of CRP in any one given policy document. Worcester came the closest, including all but one of the a priori codes. Their thorough coverage of CRP suggests that district officials from Worcester were more concerned with aspects of culture and diversity than were officials from elsewhere in Florida, though specific reasons as to why this was cannot yet be posited. The fact that Worcester was so far ahead of the others with respect to CRP also demonstrates the range of acceptable responses to the template prompts. The level of detail they provided and the aspects upon which they chose to focus were in no way consistent.

While its coverage was higher than those of Codes 3, 5, and 7, provisions relative to Code 1 (*Cultural education and responsiveness included in teacher professional development*) were also underrepresented. Only 31 inclusions were highlighted across 279 total pages of policy. This was, in some ways, a more concerning finding than the even lower numbers recorded for the previous three codes. As research had already highlighted the ubiquitous absence of professional development related to the important domains of self-reflection and the negative impact of teacher bias in the United States (i.e., Mitchell, 2019), the researcher was searching for initiatives taken by the state of Florida to combat the problem. Subsequent data collected for Phase II align with this finding; teachers are not being offered PD relative to culture. Since supportive cultural environments are conducive to learning (i.e., Choi, 2013; Hademenos, Heires, & Young, 2004; Sylvan, 2013) and since racism, cultural biases, and an assimilationist agenda have been cited by educational researchers (i.e., Garza & Crawford, 2005; Olivos & Ochoa, 2008; Salazar, 2007; Talmy, 2009), PD dedicated to equipping teachers with multicultural awareness and appreciation is vital (Bartolomé, 2012).

Even within district policies that included multiple mentions of practices relevant to Code 1, the majority of them fell under the parameters outlined by its second two criteria (*Knowing ethnic groups' cultural values, traditions, communication and learning styles, and contributions to society* and *Knowing how to use multicultural instructional strategies and add multicultural content to the curriculum*). Allegany's ELL Plan was the only one that contained a reference to the idea of teacher self-reflection, which is crucial for good instructors to practice (Montgomery, 2001) and is therefore an area that should be more widely addressed. Furthermore, it must be noted that no coded phrase associated with the second criterion mentioned the concept of respecting and understanding cultural values and traditions. Most provisions were instead more vaguely related to cross-cultural communication courses, though these sorts of courses were only

described by two districts (Kent and Allegany). It could be posited, however, that cross-cultural communication classes would likely touch upon the additional aspects suggested by the criterion.

Code 2 (*Recommendations of culturally responsive pedagogical techniques*) was another aspect that was incompletely represented across all analyzed documents. While seven of the recommended practices were found within the policies, five of the twelve research-based inclusion criteria were not addressed by any district. These neglected practices included instruction related to the "hidden curriculum," journal writing, cooperative learning groups and discussions, student self-assessment, and the encouragement of critical thinking, all of which are recommended by researchers (i.e., Bazron, Osher, & Fleischman, 2005; Brown, 2007; Gay, 2002; Harriott & Martin, 2004; Ladson-Billings, 1994; Montgomery, 2001) and therefore important pedagogical approaches in any classroom. Though there are perhaps fewer opportunities presented by the FLDOE template to list suggested teaching approaches than there are to address other CRP-related aspects, it seems as if doing so should emphasized in order to ensure effective instruction for all students. Most coded phrases found within the District ELL Plans were related to comprehensible input, the observation of student behavior and classroom performance, the usage of student portfolios as assessments, and small-group instruction and tutoring, generally conducted by paraprofessionals.

Well-represented in all twelve district policies were policy stipulations relevant to Code 4 (*Establishment of a relationship between the school, students, their families, and the surrounding community*), which was a positive finding. The FLDOE template requires district officials to address the matter within Section 8, but almost all of them, particularly those from Worcester and Allegany, went above and beyond this requirement to indicate each and every instance that parents would be notified about school-related matters as well as to describe ways in which they could involve themselves in school committees and take part in activities hosted by the

community. Only Cecil was notably sparse in their overall provisions: they were the sole district not to specify that parents were always on ELL Committees and made the fewest references to parents in general. Even Charles, which had the second-lowest frequency count for Code 4, still described considerate treatment of parents. They stated that free transportation would be provided to parents living far away to parental information meetings, which no other district mentioned doing.

There were some shortcomings within Code 4, however. Talbot, for example, neglected to select the box indicating that parents would be invited to the Professional Learning Community (PLC), Kent did not check the boxes for parental choice options or for parental involvement opportunities, and Carroll did not check the box stating that community service opportunities would be relayed to parents. This was interesting to note, as all other districts did check these boxes and there does not seem to be an obvious reason not to do so. It could be assumed that these districts were less focused upon involving parents in school-based decision making, though more investigation would be necessary to draw a definitive conclusion. Their procedures and the structure of their committees may be different, or there could be fewer community events in these districts that necessitate parental involvement. Regardless of context, implications are certainly not positive within the realm of CRP, as parents were clearly excluded in some way by Talbot, Kent, and Carroll.

Additionally, while translation services for parents and students (Code 8) were similarly well-represented, districts frequently added the term “as feasible” after their stated services. Though this may be understandable in the sense that it is sometimes difficult to predict which languages newcomer parents and students will speak before they arrive (Table 14, within the “Additional Findings” section of Chapter 4, includes the languages explicitly mentioned by each district), the modifier “as feasible” removes any sense of certainty that parents and students will

be assisted in their native language. It also eliminates any accountability on the part of the district and its schools should they fail to provide translation services.

These findings can be further contextualized by taking the lengths of each document into account. Despite the fact that all districts were presented with the exact same FLDOE template, the length and level of detail of their responses varied quite widely. The longest policy document (Worcester, at 32 pages) was exactly twice the length of the shortest two (Charles and Cecil, at 16 pages each). Worcester being listed first on Table 6 for its number of total code inclusions, then, was likely not a coincidence. This may be the most obvious representation of just how incongruent the answers provided by district officials were across the state. Though this fact alone is not necessarily a negative finding, it was certainly an unexpected one.

It is unclear how policies were reviewed by the FLDOE after being approved by district leaders or whether there was a certain standard that had to be upheld. Districts themselves are responsible for their own compliance and accountability measures with regard to policy construction and implementation. Section 7 of the FLDOE template, entitled "Monitoring Procedures," includes the prompt "Describe LEA internal procedures for monitoring the ESOL program for compliance and student academic performance" (see Table 4; Appendix A). Responses varied across policy documents, largely dependent on the given names of their major departments and sanctioned employee titles. Generally, district officials required observations of classroom instruction and school-based practice by members of designated department staff, daily logs of the support offered by specialist teams, and the allotment of instructional coaches. There were no specific inclusions of any consequences that may result from noncompliance, though some districts stated something similar to the following, taken from Frederick County's 2016-2019 District ELL Plan: "As necessary, the [Multilingual Department] director contacts the school principal or other district administrators to address concerns." Though the research

questions did not directly introduce the topic of compliance, variance in such procedures could theoretically lead to a difference in institutional-level and pedagogical practices across districts and sites, which the second research question sought to explore with the collection of ethnographic data.

In terms of cultural responsiveness, the core theoretical framework of this study, just two districts – Cecil and Charles – explicitly included the term. The same statement appeared in both of their 2016-2019 District ELL Plans, repeated verbatim: "Instruction must be grade-appropriate, age-appropriate, and culturally responsive."

Discussion of Findings: Phase II

Non-Participant Observations

Two researcher observations of elementary schools, one at each purposively-selected site, were conducted as the first step toward answering the second research question. Once approval to conduct research was confirmed by Frederick's IRB, the researcher visited both sites on the same day. The first school, assigned the pseudonym Middletown Elementary (Site A), is located in a fairly wealthy neighborhood and is quite large in size. The facilities appeared modern and relatively new to the researcher, though portables are still located outside of the main building to accommodate the student population. All instruction is monolingual (English-medium). The EL population mostly speaks Portuguese, though there are L1 Spanish speakers as well. The observation at Middletown lasted for 1 hour and 25 minutes (from 9:15 am until 10:40 am). The second school, assigned the pseudonym Tuscarora Elementary (Site B), is somewhat smaller than the first and situated in a less affluent part of the city. The building is still new, however. Unlike Middletown, Tuscarora has a two-way dual language program in English and Spanish to

which students of either L1 may apply. All other "reg ed" ("regular" classes) are conducted in English, though there are still ELs within these classes who were either unable to enroll in the dual language program or who were not accepted. The school's official website mentions that applications were only open from November-February each year, and acceptance is described as being based upon a lottery. This system means that not all students will be able to apply within the right time frame nor will they be unequivocally accepted if they are able to apply. The observation at Tuscarora lasted for 50 minutes (from 11:20 am until 12:10 pm).

Non-participant observations at both schools were unobtrusive in that they did not involve direct communication with students or entering any classrooms; the researcher was instead interested in wall displays, interactions of students, parents, and faculty in easily-accessible spaces (i.e., the hallways, the lobby, the library, the cafeteria, and outside), available resources, the presence of bi/multilingualism, and anything else that proved applicable to the study. The researcher used a notepad to record any and all potentially relevant observations and later transcribed all data, typed and printed the transcripts, and used colored markers to open-code and then axial code any emergent themes. Categorizing observations in this way – into thematic groups – more easily allowed for a comparison of procedures to policy provisions, directly addressing the first part of the second research question.

Research Question 2: In a smaller purposive sample of two elementary schools within one of these Florida school districts, in what ways, and to what extent, do the observed and reported practices of each reflect fidelity of policy implementation?

Fidelity of Policy Implementation: Observations

Before further describing additional themes and patterns noticed by the researcher, certain observed instances directly related to the fidelity of Frederick County's policy implementation at both schools. More detailed provisions and daily practices relevant to the District ELL Plan are later disclosed in relation to the interview data also collected during Phase II. One immediately evident aspect of policy was represented – at least to some extent – at the two sites: instances of bi/multilingualism. Frederick's policy specified that schools should provide assistance from a staff member (when feasible) who speaks the L1 of parents and students. Though there were no directly observed occurrences of this happening at Middletown Elementary, the researcher recorded four separate instances in which faculty communicated in Spanish to parents and/or students at Tuscarora Elementary. Of course, it is important to note that not observing something happening within a short time span does not mean that it does not routinely happen. Many factors can impact what a researcher is able to witness, including the time of the day, testing season, and pure chance. Middletown Elementary did have one label that said "El salón" below a sign for "classroom" – an instance of translation – and cafeteria workers were overheard speaking Spanish. Though most ELs at Middletown speak Portuguese, Spanish-speaking staff could certainly provide translation services to L1 Spanish-speaking students.

There was also evidence of the dual language program (representing bilingual instruction) displayed on a hallway sign at Tuscarora. The interviewee from this site would later confirm the existence of the program, which aligns with Frederick's policy provisions for both one-way bilingual and two-way dual language education programs (see Table 13). Likely due to the prevalence of Spanish throughout the building, bilingual resources for students and parents as well as translated displays were more prevalent at Tuscarora than at Middletown. There was only

one occasion in which a sign was noticeably not translated for parents at Tuscarora, noticed by the researcher as a Spanish-speaking father and his son sat outside talking by the entirely-in-English "Notice to All Visitors" sign.

One concerning finding at Middletown that could be connected to the fidelity of policy implementation was the general lack of resources for parents offered in the front office and elsewhere (Section 8 of the District ELL Plan template; Table 4 & Appendix A). Whereas Tuscarora's front office included bulletin boards and a number of flyers and brochures in both Spanish and English relevant to information for parents, "English for Families" classes, and descriptions of ESOL services, there were no such resources at least immediately visible and accessible at Middletown.

Another provision within Frederick's 2016-2019 ELL Plan was that schools, as needed, could provide textbooks in the students' L1. There was no clear evidence of this at either site, though it must be noted that Tuscarora's library was locked for testing. The fact that Tuscarora has a dual language program does necessitate the use of Spanish textbooks for at least half of its offered classes, so it can be assumed that its library contained these materials. At Middletown, almost all of the kindergarten classrooms throughout the building offered a selection of children's books that students were free to borrow beside the classroom door; in all cases, they were in English. Sunshine State Reader book covers were displayed on one hallway bulletin board, which are selections recommended by the state of Florida for children's reading lists. Again, the books were in English and did not appear include multicultural themes. It is important to note, however, that these selections change yearly, and it is certainly possible that one or both schools provided the books in additional languages upon request.

Research Questions 2a and 2b: What kinds of procedural similarities and differences exist between the two selected schools?

Emergent Themes and Axial Codes: Observations

Thematic groups for both sites were almost exactly the same, as they consisted of large categories that were intrinsically connected to what was naturally seen and heard during the observations. Tables 15 and 16 display the categories and the more specific axial codes that emerged for each. The only difference between the larger codes is that number 5 was entitled *Monolingual resources* for Site A and *Bilingual resources* for Site B due to the disparity in the sorts of materials offered to parents and students, previously described above in the context of policy fidelity. The remaining categories were as follows: 1) Multilingualism, 2) Visual displays, 3) Pedagogy, 4) School description, and 6) Culture. The axial codes within the larger categories, or core themes, are what illustrate the procedural similarities and differences at each site. To summarize what was extensively described in Chapter 4, the greatest differences between the sites were related to areas of staff attentiveness (within the fourth category of *School Description*), cultural emphasis (expressed across various axial codes within the sixth category of *Culture*), and pedagogical details (*Pedagogy*, category 3), including a potential instance of linguicism at Site A. The sites were similar in their strong security measures and generally positive environment (both within the fourth category); they also both had prominent visual displays that celebrated the students and displayed their work (second category).

One clear difference between the two sites were their emphases on culture, as was made evident through visual displays and student work samples. Though the researcher noted Middletown's lack of cultural relevancy with respect to the absence of diversity-related themes in Sunshine State Reader books and in the lack of a *Culture* or *International* section in their

library, the school did seem to focus upon the matter frequently within their classes, as evidenced by artwork celebrating multiculturalism. The teachers themselves seem to have been motivated to do so; they apparently discussed ways in which to integrate culture into the curriculum amongst themselves without any official requirement to do so. There were no such cultural displays at Tuscarora. There were, however, great displays focused on celebrating student achievements, some of which included personalized notes from the teacher about why individual students were special. These sorts of student-centered displays are recommended by CRP research (Richards et al., 2007). Additionally, two bulletin board postings were entirely devoted to Black History Month and famous black Americans as well as a selection of student artwork of Martin Luther King, which can be seen as positive steps toward a celebration of diversity.

Pedagogy was a final element that appeared to differ between the two schools during the non-participant observations. The researcher was simply able to witness more practical instructional procedures at Middletown than at Tuscarora, due in part to its library being open while a class of students was present as well as to the willingness of one teacher to allow the researcher to listen in to one part of her lesson. While it is difficult to compare instruction when there is not sufficient information on both sides, it must be noted that the following quote was recorded by the researcher during this impromptu classroom observation at Middletown:

> Teacher: [Earlier context uncertain]: “That is fortunate for us Americans, because American schools teach English. When other languages are spoken, we as Americans are the ones at a disadvantage because we can’t understand. It’s much easier for you to learn younger than for adults to learn other languages.”

Though this teacher continued by stating how she liked hearing the different languages her students spoke, she reminded them again that they sounded “different” to Americans with the clear implication that it was better to conform. Her demeanor was kind and students laughed as

she described Australian and British accents, but the researcher was unsure about the message the teacher was sending to such a diverse group of young students. She seemed to be promoting assimilation to the dominant American culture rather than celebrating pluralism in the United States, which refers to the presence of multiple languages and cultures (DeJong, 2011). While the observation was ultimately recorded as "inconclusive," as a 10-minute segment of one lesson is not enough to adequately gauge an instructor's beliefs, biases, and character, "possible linguicism" was also noted. Linguicism, as described by Liggett (2014), involves "examining how ELLs routinely encounter discrimination based on language proficiency and accent in their school community and beyond" (p. 118). Though no instruction was overheard at Tuscarora, the existence of its dual language program could potentially impact its instructor's perspective on the importance of multilingualism.

Practitioner Interviews

Two interview participants were selected from each site based upon their willingness to participate and the presence of ELs within their classes. The first interview, with a second-grade teacher from Middletown Elementary (Site A; assigned the pseudonym Vanessa), was conducted over the phone on Sunday, March 10, 2019 and lasted 20 minutes and 2 seconds. The second interview, with a third-grade teacher from Tuscarora (Site B; assigned the pseudonym Elizabeth) was also conducted over the phone and took place on Wednesday, April 10, 2019; it lasted 15 minutes and 28 seconds. Both interviews were recorded and then manually transcribed by the researcher verbatim. Transcripts were printed so they could be open coded and axial-coded using the same methodology as had previously been employed to analyze the qualitative observational data.

Research Question 2: In a smaller purposive sample of two elementary schools within one of these Florida school districts, in what ways, and to what extent, do the observed and reported practices of each reflect fidelity of policy implementation?

Fidelity of Policy Implementation: Interviews

The most important finding regarding the fidelity of policy implementation was that neither of the teachers were aware of the policy's existence; it was therefore difficult to discern its impact on school-based practice. This lack of awareness in itself demonstrates that procedures had not been adequately followed, as the district specified that "District ESOL Compliance Specialists, District ESOL Instructional Coaches, ESOL Resource Teachers, District Parent Liaisons, the school ELL Committees, and ESOL Paraprofessionals" would all have access to the plan (*Section 7: "Compliance of ELL Plan and Student Performance"*). Teachers with ELs in their classes serve on ELL Committees, and it is also important to note that neither school employed designated ESOL teachers due to the necessity of all instructors to obtain endorsement. However, because it can be assumed that other faculty members within each school – such as the principal and vice principal – were familiar with Frederick's 2016-2019 District ELL Plan, it can still be considered productive to compare their reports of daily procedures to district policy stipulations.

Regarding ESOL support within every school, the district's policy emphasized the importance of paraprofessionals in providing small group instruction and one-on-one tutoring to ELs. According the testimonials of the instructors, however, this provision was lacking within both schools. Vanessa's paraprofessional had stopped coming two months previously, and before then had rarely attended class for more than half an hour once a week. Furthermore, though Elizabeth did not see a need for a paraprofessional in her own class, the school should have

offered the support of a para to both of her ELs, as they likely still needed scaffolded instruction and linguistic support. In terms of accountability measures, school visits and classroom walkthroughs are required by policy to be conducted. Though such visits were reported at Middletown by Vanessa, Elizabeth claimed that neither she nor her same grade-level colleagues had been observed by ESOL professionals at Tuscarora.

Parental communication and translation services seemed relatively consistent to what was specified by policy. Both teachers felt as though parents were involved and made aware of important notices in a language they could understand. Bilingual staff members are required within the 2016-2019 District ELL Plan, and in both cases were present within each school to provide linguistic services to students and their families. Frederick's plan did not define which particular programs were utilized when staff were unable to help, though Elizabeth claimed that Google Translate and similar smartphone apps were occasionally used. She acknowledged that additional district-provided resources may also have been available ("because I've heard about them") that allow teachers to call and request linguistic assistance but stated that it had not been necessary thus far in her experience to access them.

WIDA, the only type of assessment mentioned by all District ELL Plans, was similarly cited by both teachers as their main method of placement testing, aligning with policy provisions. However, the computerized learning and assessment program "Imagine Learning," accounted for within Frederick's plan (see Appendix H), was said by Vanessa to only have been made available "last year," or 2018. If Imagine Learning was something the district had access to in 2016, however – when the policy was drafted – it is curious that it had not always been made available to instructors at Middletown. It is not known whether this program or others were used at Tuscarora.

Finally, both teacher's assertions that PD related to CRP was not offered by Frederick do actually align with its policy. This was represented in Phase I by Frederick's frequency total of 0 for Code 1 (*Cultural education and responsiveness included within teacher professional development*). Conversely, despite the researcher also recording a frequency of 0 for Criterion 1 of Code 9 for Frederick County (*Multicultural nights or events that celebrate the cultures of the students*, within the code of *Promotion of Diversity as an Asset and Support of Cultural Preservation*), Vanessa described these sorts of multicultural events as being common at Middletown. Observational data also supports her claim, as displays celebrating cultural diversity were evident around the school. This means that, despite policy not accounting for or requiring multicultural events, teachers within at least one of the district's schools decided on their own to celebrate the cultures of their students. Policy documents, therefore, do not necessarily represent the practice of schools within their domain. In this case, the exception to policy was a positive one, but this may not always be so.

Research Questions 2a and 2b: What kinds of procedural similarities and differences exist between the two selected schools?

Emergent Themes and Axial Codes: Interviews

Tables 17 and 18, when compared to one another, highlight the differences in practice between both sites as reported by the interview participants. The core themes were the same, revolving principally around the questions asked by the researcher (Practitioner Interview Protocol; Appendix D), and consisted of the following: 1) District ELL Plan, 2) School/program information, 3) Mentions of bilingualism, 4) Training and PD, 5) Culture and curriculum accessibility, 6) Translation resources, 7) Parental communication, and 8) Teacher opinions.

Many of the axial codes within these larger categories were cross-listed. Because of this, neither "Translation services" nor "Teacher opinions" had to be additionally contextualized with thick-rich description in Chapter 4. Their inclusion provided a helpful visual when reported by Tables 17 and 18, but the majority of their contents were covered by prior categories.

Similarities between participant responses, as demonstrated by the axial codes reported by Tables 17 and 18, lie within their shared unfamiliarity with the district's ESOL policy, sentiments regarding the cultural inaccessibility of the provided curriculum, desire for more catered, effective PD relative to teaching ELs, and their citations of bilingual staff and satisfactory translation resources. Both teachers adapted the given materials to better suit their needs and mentioned the necessity of ensuring that students could actively understand and participate in class. These elements shared in common are all reflective of district-wide provisions, including the lack of emphasis placed upon the District ELL Plan, the curricular materials made available (as well as permission given to adapt them), and the professional development offered within the region. It makes sense, therefore, that the responses of each teacher were similar in these respects. The PD they both discussed was the same PD offered by Frederick County. Training relevant to culture would not be available to just one of the teachers; it was instead absent for all teachers within the district.

In terms of differences, one of the significant ones made evident were the compliance measures both teachers described. At Middletown, efforts were made to observe the instruction of ELs as it pertained to state standards. Observations were possibly also done to ensure that the procedures of the District ELL Plan were followed, though this was not explained to Vanessa. Elizabeth, however, cited no such efforts, and seemed to feel as though the required checklists were easy to circumvent. There were also differences in opinions regarding the efficacy of online ESOL training. While Vanessa, who had received ESOL endorsement via in-person university

coursework, felt that the requisite computer-based classes were ineffective, Elizabeth – a teacher who had actually taken these classes – felt that they were useful and applicable to her experience as a teacher of ELs. Interviewing more teachers about the training would allow for a better understanding of how online ESOL coursework is perceived across the state of Florida.

Limitations

The following limitations were noted within the confines of this study:

1. The theoretical framework of CRP may be limiting to researchers with differing perspectives in mind with respect to ESOL instruction.
2. Replication of the study may prove difficult in states without the officially-codified ESOL policies such as are officially required within the state of Florida.
3. Even with credibility measures meant to ensure the validity of the content analysis protocol, innate researcher beliefs and biases may have impacted data interpretation.
4. Observed findings are not generalizable across the state of Florida nor to other states across the country.
5. Practitioner interviews were limited in number, so their knowledge cannot be said to represent the knowledge of all individuals in their position within the district.

Additionally, it must be noted that one of the assumptions outlined in Chapter 1 regarding the study's methodology ("Interviewed practitioners are familiar with the 2016-2019 ELL Plans as well as cognizant of potential challenges that may be facing the ELs in their particular class and/or school," p. 25) was not entirely met. Neither teacher interviewed was at all aware of the existence of their district's ESOL policies. This fact introduced a supplementary limitation to the interview process: the researcher was unable to gather how policy was discussed and applied in

daily practice because it was not discussed at all. Both interviewees, however, did express awareness of the challenges ELs can face in school.

Implications for Practice

The findings of this study, though not generalizable, nevertheless have multiple potential implications on the creation and adaptation of ESOL policy and pedagogical practice across the United States.

1. The fact that the 2016-2019 District ELL Plans were not universally accessible raises the concern of whether the public is reliably able to access policies relevant to the educational needs of all students, not only marginalized populations such as ELs. School district-level decision making should be a transparent process, centered around research, logic, and a sense of advocacy. Though Florida's 1990 Consent Decree did lead to the FLDOE's requirement to complete the ELL Plan template, the two teachers interviewed for Phase II seemed to imply that their district's responses to all prompts were perfunctory rather than purposeful. The frequent instance of copy-and-pasted answers across these prompts (which occurred at least once in all documents) and one instance of plagiarized language between two separate policies imply laziness at worst and a lack of complete commitment at best. Policies are meaningless if they are not being consulted, no matter how positive their provisions on paper.
2. Phase I results showed that CRP was represented in the 2016-2019 District ELL Plans of Florida school districts, though not universally nor consistently. Certain aspects of CRP were almost entirely absent, such as mentions of respect for and between students, anti-bullying procedures, efforts to hire staff from diverse

cultural backgrounds, PD relevant to culture, and explicit value for diversity. As research has highlighted the importance of all such aspects, school district officials should be made cognizant of addressing them within their ESOL policies.

3. With respect to compliance measures, teacher interviews further implied that, while classroom observations are conducted by various personnel, these personnel have not mentioned the District ELL Plan as including guidelines for them to follow; upper-level staff, including principals, also did not communicate this information. If policy is expected to be carried out, then compliance procedures – and the consequences of non-compliance – should be more clearly delineated. The teacher from the first site mentioned, for example, that the paraprofessionals required to assist teachers with ELs once a week only come for about a half an hour and that this time had recently negatively fluctuated; she had not seen her paraprofessional in two months. In such a case, it is unclear how noncompliance can be penalized. The checklist described by the second teacher, likely present within many schools, also seems an ineffective way to ensure compliance.
4. During Phase II interviews, both practitioners claimed that PD relevant to ESOL existed within the district but was not offered outright. They felt, however, that such PD should be more greatly emphasized than it is currently. Receiving ESOL endorsement via online coursework in Florida is a positive step in the right direction, but training is necessary for teachers at all levels of experience throughout their educational career, especially in order to stay informed of current research. Because all teachers are endorsed in ESOL, there no longer seem to be any experts in the field within Florida's schools. As the first teacher in particular

described, this has led to a lack of understanding when it comes to how to best meet the needs of ELs.

5. PD sessions attended by both interviewees during their employment at Florida public schools had never included concepts related to culture. Frederick County (pseudonym) did not make any such provision in their District ELL Plan, but other districts – such as Kent, Allegany, and Worcester (pseudonyms) did, meaning that there is an inconsistent awareness across the state of the importance of this sort of training. This finding reflects the research of Mitchell (2019), who previously found that only three U.S. states expressly require teachers to learn about the potential impact of bias and institutional racism on students and learning.
6. Of the twelve districts selected for this study, one – Worcester (pseudonym) – emerged as particularly successful at incorporating CRP into their 2016-2019 District ELL Plan. This fact proves that doing so is possible within the current FLDOE template. Worcester's policy also, therefore, provides examples of practices that could realistically be adopted by other districts in Florida as well as by school districts elsewhere in the country. Furthermore, the nine research-based codes relevant to CRP selected by the researcher (Table 1; Appendix C) are specific enough to be consulted during the formation of future policy; they describe pedagogical and institutional-level procedures that could be incorporated into district ESOL requirements.

Recommendations for Future Research

This study was always intended to lay groundwork for future research. It was largely descriptive and exploratory: it sought to highlight potential problems raised by current ESOL policy in the state of Florida and its implications on practice rather than to explore the root of these problems and to posit solutions. For this reason, there are multiple areas that subsequent researchers should still investigate further.

1. The criterion sample selected for this study was not representative of practice across the entire state. Because inconsistencies between just the twelve selected counties were identified, there is a need to expand the focus and examine the ELL Plans of Florida's 55 remaining school districts. Furthermore, as the 2020 school year approaches, new policies will take effect shortly that could be assessed using a similar methodology by future studies.
2. Whether in conjunction with or separately to additional policy analyses described by the prior suggestion, more in-depth qualitative research within schools is clearly called for after the results presented by this study in order to see whether the initial patterns of practice here identified are present within other schools and districts. Interviews with principals and higher-level district officials could additionally help shed light on the intricacies of policy creation and compliance measures, answering questions raised by the present study regarding the apparent absence of policy within schools.
3. The theoretical framework of CRP was selected for the present study. Research has shown that aspects related to CRP are underrepresented in nationwide educational policies (Mitchell, 2019; Samson & Collins, 2012), but that is not to

say that this is the only framework relevant to the treatment of ELs. Multiple researchers analyzing district-level ESOL procedures – and even educational policies geared to other student populations, such as exceptional and special education – through various theoretical lenses could spark important discussion about other facets of instructional support and policy that could be better addressed.

4. Not all states require the adoption of ESOL policies; in fact, only seven of them necessitate any preservice ESOL training and include provisions beyond the national mandate for some form of in-service PD (ECS, 2014; Wheeler, 2014). Researchers living outside Florida could investigate their own state's requirements – or lack of requirements – as well as how districts within their state approach the process of deciding what practices should be adapted within their schools without the outside influence of the state.
5. Exploring the impact of CRP on academic achievement, as measured by WIDA or another ELP assessment, could be done in order to better argue the necessity of incorporating CRP into ESOL policy. Schools within districts such as Worcester (pseudonym), shown by this study to have effectively addressed CRP within their 2016-2019 ELL Plan, could be studied and student performance data could be collected and compared to schools from districts with fewer CRP provisions within their plans. Finding a definitive, direct link between culturally responsive policy and student academic success would be ideal. However, even without such evidence, focusing upon the sociocultural adaptation of children and nurturing them within a supportive environment is still a worthwhile venture.

6. As one of the findings of this study has been policy's apparent lack of influence on practice, the nature of policy itself could be investigated by future researchers. Gibson (1977) describes the theory of *affordance*, which is the notion that the design of something – in this case, the wording of policy – should encourage its intended use rather than place constraints upon practice (elaborated upon by Greeno, 1994). Policy, for the purposes of this study, should therefore be written to facilitate CRP rather than to simply mandate and prohibit different behaviors without any sort of unifying objective. In this way, it is more likely that the desired behavior will manifest within schools. Using the same methodology outlined by this study for a critical policy analysis, subsequent studies could both identify and analyze current affordances that may be in place within policy (through the lens of CRP or another theoretical framework) as well as suggest ways in which policy could be re-written to include more such affordances.

Conclusions

Findings from this study parallel previous studies that have argued the potential incomprehensibility, ineffectiveness, and innately confusing nature of educational policy (Spillane, 2004; Malen & Knapp, 1997). In this case, however, the core issue was not necessarily the policies themselves, though the many inconsistencies between them are certainly concerning, but rather their inaccessibility. In two of the district cases selected for this study, the 2016-2019 ELL Plans were not accessible even after a concerted attempt by the researcher to locate them. As these particular ESOL policies are meant to be consulted by the parents of ELs and contain a wealth of important information, it should be an easy process to find, download, and print them. Furthermore, in at least the two schools visited for the purposes of this study, the District ELL

Plans were not discussed with teachers nor distributed to school employees. If teachers are unaware of the policy they are meant to implement, the content of that policy is irrelevant to pedagogical practice. Operating under the assumption that higher-level officials at each of the schools are aware of the district's provisions as outlined in the 2016-2019 ELL Plan, a lack of communication amongst faculty implies that collaboration could have been better focused upon in at least these two individual cases. To best meet the needs of all students, particularly those with additional, specialized needs such as ELs, effective collaboration is critical; it also assists in the creation of a supportive and nurturing educational environment for learners (Nutta et al., 2012).

To compound this matter, the lack of PD relevant to cross-cultural communication and cultural sensitivity – indicated by the low Code 1 frequencies for Phase I (*Cultural Education and Responsiveness Included within Teacher Professional Development*) and directly expressed by both teachers during Phase II interviews – aligns with the findings of previous research (i.e., Mitchell, 2019; Samson & Collins, 2012) as well as with experts who have argued the general inefficacy of PD nationwide (Lucas & Grinberg, 2008). Such shortcomings in teacher training are just one way in which schools are failing to enact fully culturally responsive policies, expressly called for by researchers (i.e., Bartolomé, 2012; Gay, 2000; Ladson-Billings, 1990, 1994, 1995; Paris, 2012; Richards, Brown, & Forde, 2007) and exemplified by models such as Alaska Standards for Culturally Responsive Schools (n.d.). Both teachers additionally cited the absence of culturally relevant curricula in their district, claiming it was instead necessary for them to adapt provided materials in order to make curricular content more accessible to their diverse students. The matter of cultural inaccessibility is another common finding nationwide that has been argued and elaborated upon by prior researchers (i.e., Brown, 2007; Franquiz & Salinas, 2013; Heath, 1989; Wong, 2008).

A heavy focus on standardized testing (Code 6, Phase I; Appendix H) is also outweighing informal measures of assessment that may better represent a student's true ability. Formal ELP assessments may address overall language proficiency, but they fail to account for the progress students may have made in acquiring learning strategies, adapting to their new sociocultural environment, and in developing linguistic competencies (Bailey & Carroll, 2015). These factors are crucial to the educational experience of all learners and should be more universally observed and assessed by instructors in order to ensure their ultimate success in the classroom. It has also been posited that ELP assessments may not even be accurate measures of fluency and proficiency. A focus on BICs and the ability of students to interact in social situations may be more valid indicator of language level than an over-emphasis on CALP, particularly at young ages when even native-speaking students have not yet begun to acquire academic skills (Wolf & Faulker-Bond, 2016). Moreover, the disparate assessment types mentioned across the twelve districts in the sample (Appendix H) exemplify the concerns of Ragan and Lesaux (2006), who argue that testing procedures nationwide are in no way predictable nor consistent.

One of the 2016-2019 ELL Plans analyzed for this study, the one from Worcester, was particularly successful in their incorporation of multiple aspects of CRP into their ESOL policy; they also made additional and exceptional provisions for L2 parents and their children that indicated care and consideration for their cultural and linguistic needs. Though there were other such positive instances recorded and coded in the remaining policy documents (Table 6), Worcester set the example and proved that thoughtful, comprehensive, and culturally relevant policies were possible to formulate within the requirements set by the FLDOE. Despite the fact that many shortcomings and inconsistencies were identified and discussed within Phase I of this study, there is at least a possible frame of reference that could be consulted as districts revise and draft policies for coming years.

Ultimately, the researcher was not able to definitively discern the impact of policy on practice; results cannot be reliably generalized to the remainder of the state of Florida nor to other states in the country. Subsequent findings from elsewhere in Florida and/or nationwide may, and hopefully do, contrast what was concluded by the present study. Regardless, however, this initial exploratory analysis of twelve district ESOL policies and their implications on practice within two public elementary schools have made it clear that there is no shortage of areas that could be improved upon with respect to the treatment of ELs across the United States. Firstly, ESOL policies must exist nationwide – not solely within the seven states that have responded to the mandates of advocacy groups (ECS, 2014; Wheeler, 2014). These policies must emphasize cultural relevance, be made readily available to parents and teachers, and, most importantly, be consulted by practitioners during decision-making related to pedagogy and testing. Findings relevant to the first research question also highlight the importance of these policies being consistent. Research, cross-district collaboration, and a focus on student advocacy should drive the construction of well-informed policies, and knowledge gained through such rigorous processes should be shared with practitioners nationwide.

APPENDIX A
DISTRICT ELL PLAN TEMPLATE (2016-2019)

2016-2019 FLDOE DISTRICT ELL PLAN TEMPLATE

2016-2019

District
English Language Learner Plan

Contact Person: _____
LEA: _____
Email: _____
Phone: _____

Rule 6A-6.0905
Form ESOL 100
(June 2016)

Date Received by FDOE

Original signatures on Signature Pages are to be submitted to:
Bureau of Student Achievement through Language Acquisition
Florida Department of Education
325 West Gaines Street
444 Turlington Building
Tallahassee, Florida 32399-0400

FDOE INTERNAL USE ONLY

(1) NAME OF THE DISTRICT:	(2) CONTACT NAME/TITLE:	(3) CONTACT PHONE NO.(EXT.): EMAIL ADDRESS:

(4) MAILING ADDRESS:	(5) PREPARED BY: (if different from contact person) First Name: Last Name: Mailing Address: Phone No:

(6) CERTIFICATION BY SCHOOL DISTRICT

The filing of this application has been authorized by the School Board and the undersigned representative has been duly authorized to submit this plan and act as the authorized representative of the district in connection with this plan.

I, _____, do hereby certify that all facts, figures, and representations made in this plan are true and correct. Furthermore, all applicable statutes, rules, regulations, and procedures for program and fiscal control and for records maintenance will be implemented to ensure proper accountability.

Signature of Superintendent or Authorized Agency Head _____ Date Signed _____ Date of Governing Board Approval _____

(7) Chairperson representing the District ELL Parent Leadership Council (PLC)

Name of Chairperson representing the District ELL PLC:

Contact Information for District PLC Chairperson:
Mailing address:

E-mail Address: Phone Number:

Date final plan was discussed with PLC:

Signature of the Chairperson of the District PLC _____ Date Signed by PLC Chairperson: _____

Section 1: Identification (Rule 6A-6.0902, F.A.C.)

Enrollment Procedures and Administration of the Home Language Survey (HLS).

Describe the Local Education Agency (LEA) registration procedures to register English Language Learners (ELLs). Responses should include the following:

How do LEA procedures compare to those followed for non-ELLs?

Into what languages are the HLS translated?

How does the LEA assist parents and students who do not speak English in the registration process?

How do you identify immigrant students?

How is Date Entered US School (DEUSS) obtained in the registration process?

Please include a link to your HLS.

Section 2: English Language Proficiency Assessment (Rule 6A-6.0902, F.A.C.)

1. English Language Proficiency (ELP) Assessment

What is the title of the person(s) responsible for administering the ELP assessment of potential ELLs in the LEA? (Check all that apply.)

- ☐ Registrar
- ☐ ESOL Coordinator/Administrator
- ☐ Other (Specify)

2. Listening and Speaking Proficiency Assessment

List the Listening and Speaking (Aural/Oral) assessment(s) used in the LEA to ascertain if a K-12 student is an ELL.

Describe the procedures to ensure that the Listening and Speaking assessment(s) are administered within 20 school days of the student's initial enrollment.

For ELLs who score proficient on the Listening and Speaking assessment, what specific grade level procedures are followed for proper identification of ELLs in K-2 and 3-12?

Reading and Writing Proficiency Assessment

List the Reading and Writing assessment(s) used in the LEA to ascertain if a student is an ELL in grades 3-12.

Describe the procedures the LEA follows if assessment(s) are not given within the 20-day timeline.

3. ELL Committee

Describe the procedures used when the ELL Committee makes an entry (placement) decision. What type of documentation is used to support these decisions?

Section 3: Programmatic Assessment (Rule 6A-6.0902, F.A.C.)

Academic/Programmatic Assessment

Describe the procedures that have been implemented for determining prior academic experience of ELLs. Also, address the placement of ELLs with limited or no prior school experience(s) or whose prior school records are incomplete or unobtainable. Specify actions taken to obtain prior school records. Include the procedures to determine appropriate grade level placement for ELLs.

Grade Level and Course Placement Procedures – Grades 9-12

Describe the procedures that have been implemented to determine appropriate grade and course placement. Descriptions must include the process used for awarding credit to ELLs entering high school in 9th-12th grades that have completed credits in countries outside of the United States, specifically addressing those students for which there is no documentation.

Explain the process for awarding credit to students transferring from other countries for language arts classes taken in the student's native language and for foreign languages the student may have taken (this may include English).

What is the title of person(s) responsible for evaluating foreign transcripts? How are they trained? How is documentation maintained?

Re-evaluation of ELLs that Previously Withdrew from the LEA

Describe the procedures used for re-evaluating ELLs who withdraw from the LEA and re-enroll after having been either in another LEA, state, or country. Specify the length of time between the ELLs' withdrawal and re-enrollment after which a new English language proficiency assessment is to be administered. Include data reporting procedures.

Moving from one Florida LEA to another:

Moving from another state to Florida LEA:

Moving from another country to Florida LEA.

ELL Student Plan Development

Describe the procedures for developing the Student ELL Plan. Include the title(s) of the person(s) responsible for developing the plan, and updating the ELL data reporting elements. Also, include a description of when and how the plan is updated to reflect the student's current services.

Describe the elements of the plan (e.g., home-school communication, student schedules and classes, progress monitoring, interventions, assessments and other evaluations). What is the teacher's role in development of the plan?

Please include a link to the ELL Student Plan.

Section 4: Comprehensive Program Requirements and Student Instruction

Instructional Models

In addition to using required English for Speakers of Other Languages (ESOL) strategies by teachers who teach ELLs, what instructional model(s) or approach(es) are used to ensure comprehensible instruction? Descriptions of each model appear in the current Florida Department of Education (FDOE) Database Manuals. *(Check all that apply)*

- ☐ Sheltered English Language Arts
- ☐ Sheltered Core/Basic Subject Areas
- ☐ Mainstream-Inclusion English Language Arts
- ☐ Mainstream-Inclusion Core/Basic Subject Areas
- ☐ Maintenance and Developmental Bilingual Education
- ☐ Dual Language (two-way) Developmental Bilingual Education

Describe how the instructional models are used in the LEA. Address how the LEA will monitor schools to ensure that instructional models are implemented with fidelity.

Describe the process to verify that instruction provided to ELLs is equal in amount, sequence, quality, and scope to that provided to non-ELLs.

How does the LEA determine if the instructional models are positively affecting student performance?

How are ELLs assured equal access to all programs, services and facilities that are available to non-ELLs?

Describe the method(s) used in the LEA to document the use of ESOL instructional strategies and how this is monitored.

How does the LEA and school(s) verify the delivery of comprehensible instruction to ELLs?

What safeguards are in place to ensure that all ELLs are being provided equal access to programs and receiving comprehensible instruction? Include the school and LEA personnel responsible for ensuring comprehensible instruction.

What progress monitoring tools are being used to ensure all ELLs are mastering grade level academic content standards, and benchmarks and the English Language Development (ELD) standards? *(Check all that apply)*

- ☐ Student Portfolios
- ☐ Other Criterion Referenced Test (Specify) _____
- ☐ Native Language Assessment (Specify) _____
- ☐ LEA/school-wide assessments (Specify) _____
- ☐ Other (Specify) _____

Student Progression

Have the LEA's standards and procedures for promotion, placement, and retention of ELLs been incorporated into the LEA's Student Progression Plan (SPP)? If no, where can this information be found?

- ☐ Yes. Please provide a link to the LEA's SPP with specifics to ELLs highlighted.
- ☐ No (Specify) _____

Describe how the Good Cause Policy is implemented in your LEA when ELLs who have been enrolled for less than two years (based on DEUSS) are exempted from mandatory third grade retention. Include how parents or guardians are notified of LEA good cause decisions.

Describe what role the ELL Committee has in the decision to recommend the retention or promotion of any ELL and what documentation is used to support these decisions.

Section 5: Statewide Assessment (Rule 6A-6.09091, F.A.C.)

Statewide Assessment

Describe the process to ensure that all ELLs participate in Florida statewide assessment programs. Include how responsible staff is trained to administer assessments and maintain documentation of the following:

Statewide content area assessments:
ACCESS for ELLs assessment programs:

What is/are the title(s) of the school-level person responsible for ensuring and documenting that ELLs are provided appropriate testing accommodations (per test administration requirements)?

Describe how parents of ELLs are notified of assessments and testing accommodations. How does the LEA ensure that parents understand Florida's statewide assessments policies, mandates and student outcomes? Please provide links to communications in parents' languages.

Section 6: English Language Proficiency Annual Assessment (Rule 6A-6.0903, F.A.C.)

Describe the procedures to determine if ELLs are ready to exit the LEA's ESOL program. Include exiting procedures for all language domains (listening, speaking, reading and writing), grade-specific academic criteria and data reporting of status change.

What is the title of person(s) responsible for conducting the exit assessments described above? (Check all that apply.)

- ☐ School/LEA based testing administrator
- ☐ ESOL Teacher/Coordinator
- ☐ Other (Specify) _____

When is an ELL Committee involved in making exit decisions? What criteria are used by the Committee to determine language and academic proficiency?

Describe the procedures if an ELL meets exit qualifications in the middle of a grading period.

Section 7: Monitoring Procedures (Rule 6A-6.0903, F.A.C.)

During the required two-year monitoring period, what is the title of person(s) responsible for:

Conducting the follow-up performance of former ELLs?
Updating the student ELL plan?
Reclassification of ELL status in data reporting systems?

What documentation is used to monitor the student's progress? (Check all that apply)

- ☐ Report Cards
- ☐ Test Scores
- ☐ Classroom Performance
- ☐ Teacher Input
- ☐ Other (Specify) _____

What are the procedure(s), including possible reclassification, that are implemented when the academic performance of former ELLs is not on grade level?

Compliance of ELL Plan and Student Performance

Describe LEA internal procedures for monitoring the ESOL program for compliance and student academic performance.

How do school sites, parents and stakeholders have access to the approved District ELL Plan?

How does the LEA ensure that schools are implementing the District ELL Plan?

Section 8: Parent, Guardian, Student Notification and Rights

Describe the procedures used by school personnel to provide assistance to parents or guardians of ELLs in their home language.

Describe parent outreach activities that inform parents of how they can be involved in their children's education and how they can assist their children to learn English and meet state academic standards.

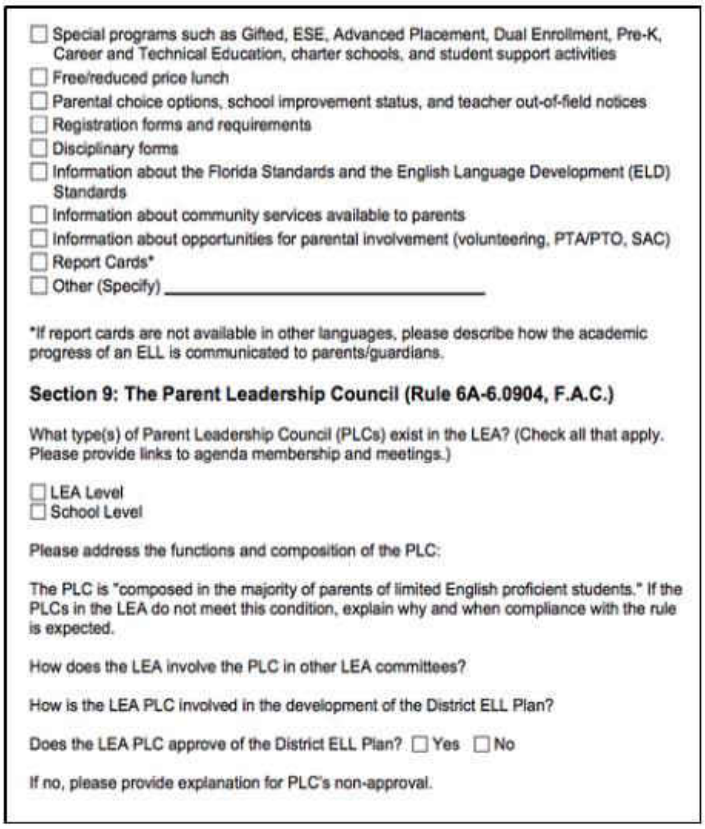
Check the school-to-home communications that are sent by the LEA or school to parents or guardians of ELLs that are in a language the parents or guardians can understand. (Check all that apply. Please provide links to all boxes checked.):

- ☐ Delay in language proficiency testing
- ☐ Results of language proficiency assessment
- ☐ Program placement
- ☐ Program delivery model option(s)

- ☐ Extension of ESOL instruction
- ☐ Exit from ESOL program
- ☐ Post-reclassification of former ELLs monitoring
- ☐ Reclassification of former ELLs

- ☐ State and/or LEA testing
- ☐ Accommodations for testing (flexible setting)
- ☐ Annual testing for language development
- ☐ Growth in language proficiency (Listening, Speaking, Reading, Writing)
- ☐ Exemption from FSA in ELA for ELLs with DEUSS less than one year
- ☐ Retention/Remediation/Good Cause
- ☐ Transition to regular classes or course change

- ☐ Invitation to participate in an ELL Committee Meeting
- ☐ Invitation to participate in the Parent Leadership Council (PLC)



☐ Special programs such as Gifted, ESE, Advanced Placement, Dual Enrollment, Pre-K, Career and Technical Education, charter schools, and student support activities
☐ Free/reduced price lunch
☐ Parental choice options, school improvement status, and teacher out-of-field notices
☐ Registration forms and requirements
☐ Disciplinary forms
☐ Information about the Florida Standards and the English Language Development (ELD) Standards
☐ Information about community services available to parents
☐ Information about opportunities for parental involvement (volunteering, PTA/PTO, SAC)
☐ Report Cards*
☐ Other (Specify) _____

*If report cards are not available in other languages, please describe how the academic progress of an ELL is communicated to parents/guardians.

Section 9: The Parent Leadership Council (Rule 6A-6.0904, F.A.C.)

What type(s) of Parent Leadership Council (PLCs) exist in the LEA? (Check all that apply. Please provide links to agenda membership and meetings.)

☐ LEA Level
☐ School Level

Please address the functions and composition of the PLC:

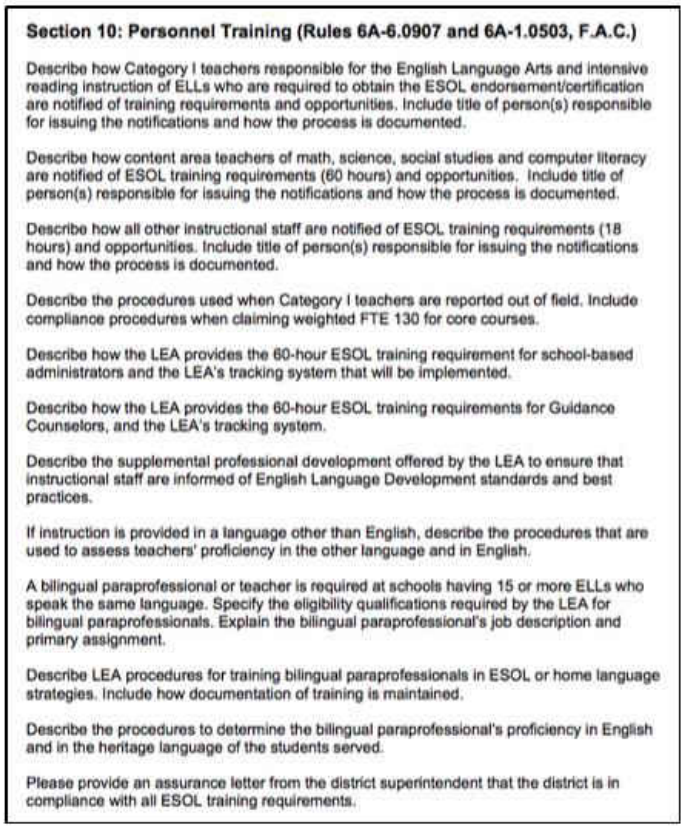
The PLC is "composed in the majority of parents of limited English proficient students." If the PLCs in the LEA do not meet this condition, explain why and when compliance with the rule is expected.

How does the LEA involve the PLC in other LEA committees?

How is the LEA PLC involved in the development of the District ELL Plan?

Does the LEA PLC approve of the District ELL Plan? ☐ Yes ☐ No

If no, please provide explanation for PLC's non-approval.



Section 10: Personnel Training (Rules 6A-6.0907 and 6A-1.0503, F.A.C.)

Describe how Category I teachers responsible for the English Language Arts and intensive reading instruction of ELLs who are required to obtain the ESOL endorsement/certification are notified of training requirements and opportunities. Include title of person(s) responsible for issuing the notifications and how the process is documented.

Describe how content area teachers of math, science, social studies and computer literacy are notified of ESOL training requirements (60 hours) and opportunities. Include title of person(s) responsible for issuing the notifications and how the process is documented.

Describe how all other instructional staff are notified of ESOL training requirements (18 hours) and opportunities. Include title of person(s) responsible for issuing the notifications and how the process is documented.

Describe the procedures used when Category I teachers are reported out of field. Include compliance procedures when claiming weighted FTE 130 for core courses.

Describe how the LEA provides the 60-hour ESOL training requirement for school-based administrators and the LEA's tracking system that will be implemented.

Describe how the LEA provides the 60-hour ESOL training requirements for Guidance Counselors, and the LEA's tracking system.

Describe the supplemental professional development offered by the LEA to ensure that instructional staff are informed of English Language Development standards and best practices.

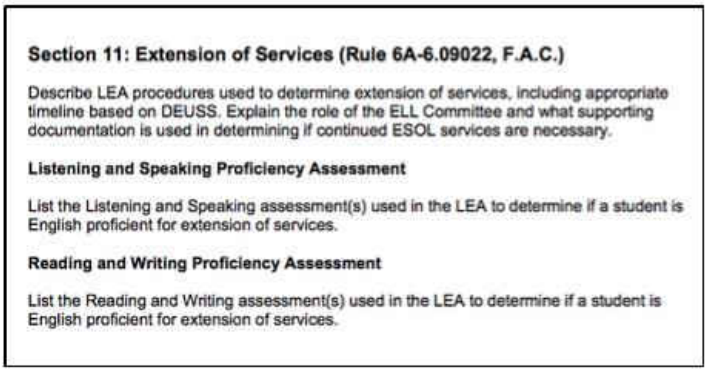
If instruction is provided in a language other than English, describe the procedures that are used to assess teachers' proficiency in the other language and in English.

A bilingual paraprofessional or teacher is required at schools having 15 or more ELLs who speak the same language. Specify the eligibility qualifications required by the LEA for bilingual paraprofessionals. Explain the bilingual paraprofessional's job description and primary assignment.

Describe LEA procedures for training bilingual paraprofessionals in ESOL or home language strategies. Include how documentation of training is maintained.

Describe the procedures to determine the bilingual paraprofessional's proficiency in English and in the heritage language of the students served.

Please provide an assurance letter from the district superintendent that the district is in compliance with all ESOL training requirements.



Section 11: Extension of Services (Rule 6A-6.09022, F.A.C.)

Describe LEA procedures used to determine extension of services, including appropriate timeline based on DEUSS. Explain the role of the ELL Committee and what supporting documentation is used in determining if continued ESOL services are necessary.

Listening and Speaking Proficiency Assessment

List the Listening and Speaking assessment(s) used in the LEA to determine if a student is English proficient for extension of services.

Reading and Writing Proficiency Assessment

List the Reading and Writing assessment(s) used in the LEA to determine if a student is English proficient for extension of services.

Source:

Florida Department of Education. (2015). 2016-2019 English Language Learner (ELL) Plan. Retrieved from https://web02.fldoe.org/rules/doc/6A-6.09021_464.pdf

APPENDIX B:
CONTENT ANALYSIS PROTOCOL

CONTENT ANALYSIS PROTOCOL

The following template was adapted for all a priori codes (See Appendix C); the number of columns may vary depending on the number of inclusion criteria present within the ELL Plans (particularly for codes 6, 7, and 8, which do not include any additional criteria).

Thick-rich description and explanations accompany each table.

A Priori Code:

	Frequency				Total
District, Ranked by # of Mentions	Criterion 1	Criterion 2	Criterion 3	Criterion 4	
Total					
Districts Included (/12)					

APPENDIX C
RESEARCH-BASED CODES: INCLUSION CRITERIA

Content Analysis Protocol: Research-Based Codes for CRP

The following are the nine criteria that were used during the a priori (or template) coding process, intended to answer the first research question. The codes principally drew upon the research of Brown (2007), Richards, Brown, & Forde (2007), Gay (2000, 2002), and, to a lesser extent, Ladson-Billings (1990, 1994, 1995), though additional sources – mentioned by the literature and then independently consulted by the researcher – were also cited when utilized. Furthermore, the Alaska Standards for Culturally Responsive Schools (n.d.) served as a model of a successfully-implemented institution-wide policy focused upon CRP; they therefore provided an example of which CRP-related factors could realistically be expected to be incorporated within school district plans. The template of the District ELL Plan itself (Appendix A; summarized in Table 4) was also carefully considered when deciding upon the scope of the analytical coding process, as only topics the policy addresses in the first place can be more deeply explored.

The first a priori code that was used to analyze the district ELL Plans is *Cultural education and responsiveness included within teacher professional development* (Brown, 2007), as teachers must be adequately prepared to meet the diverse cultural and linguistic needs of their ELs. Mentions of the following elements were used as inclusion criteria during the coding process:

- Looking at one's own attitudes and practices (Montgomery, 2001)
- Knowing ethnic groups' cultural values, traditions, communication and learning styles, and contributions to society (Gay, 2002)
- Knowing how to use multicultural instructional strategies and add multicultural content to the curriculum (Gay, 2002)

The second code was *Recommendations of culturally responsive pedagogical techniques*, numerous of which are described by researchers that have been helpfully compiled by Brown (2007) to include suggestions that served as inclusion criteria. Any of the following strategies mentioned within the ELL Plans were included in the analysis:

- Explicit, clear instruction in a language the student can understand (Gay, 2002)
- Including material related to the "hidden curriculum" and the state of society (Montgomery, 2001; Navarro, as cited in Brown, 2007; Bazron, Osher, & Fleischman, 2005; Gay, 2002)
- Scaffolding techniques (Gay, 2002)
- Journal writing (Montgomery, 2001)
- Cooperative learning groups and discussions (Harriott & Martin, 2004; Navarro, as cited in Brown, 2007)
- Frequent observation of student behaviors and social skills (Brown, 2007)
- Usage of portfolios as assessments (Irvine & Armento, 2001; Montgomery, 2001)
- Teacher-made tests meant to meet student needs (Brown, 2007)
- Student self-assessment (Montgomery, 2001)
- One-on-one instruction and individual student focus (Navarro, as cited in Brown, 2007)
- Open discussion of student differences and similarities (Banks & Banks, 2004; Chamberlain, 2005; Gay, 2000; Ladson-Billings, 1994)
- Encouragement of critical thinking (Banks & Banks, 2004; Gay, 2000; Ladson-Billings, 1994)
- Inclusion of speech and events that are culturally relevant to students (Irvine &

Armento, 2001)

The third code was *Provision of diverse curricular resources that portray individuals from different backgrounds* (as described by Richards, Brown, & Forde, 2007). Inclusion criteria included mentions of:

- Teacher supplementation of curricular instruction with material that sensitively and realistically portrays individuals from different backgrounds (Richards et al., 2007)
- Teacher awareness of potential stereotypical materials included in textbooks and other pedagogical resources (Richards et al., 2007)
- The creation of student-centered bulletin boards that contain culturally relevant images and themes (Richards et al., 2007)
- Student-recommended and/or produced resources to add meaningful context to instruction (Richards et al., 2007)

Fourth was *Establishment of a relationship between the school, students, their families, and the surrounding community* (Richards et al., 2007), which is vital in establishing a supportive environment that enables open communication and cooperation between teachers and parents and implicitly promotes the importance of the students' home cultures. Inclusion criteria were fairly straightforward; ELL Plans were reviewed for the following elements:

- Mentions of communication to parents of ELs regarding news, policies, and school events that may be occurring
- Invitations for parents and family members to participate in community events (Richards et al., 2007)

- Eligibility of parents to join committees and contribute to school-based decision making (Richards et al., 2007)
- Mentions of parental workshops and conferences (Richards et al., 2007)
- Discussion of respect for parents, guardians, and other family members (Richards et al., 2007)

The fifth code was *Promotion of mutual respect among students* (Richards et al., 2007), as effective pedagogical and administrative strategies are not enough to combat potentially negative and unwelcoming atmospheres created by the peers (whether intentionally or not) of elementary English language learners. Harriot and Martin (2004) describe this idea as the building of a learning community, fostering healthy student growth and development in a supportive context. The researcher coded lines relevant to:

- Enforcing standards of behavior in the classroom (Richards et al., 2007)
- Teachers serving as role models of fairness and kindness (or related concepts) in the classroom (Richards et al., 2007)
- Anti-bullying policies school-wide or within the classroom related to cultural and linguistic differences (Richards et al., 2007)
- Monitoring of student behaviors and communication styles, with awareness of which may be the result of cultural differences, to avoid unfairly penalizing ELs (Richards et al., 2007)

Sixth was *Multiple forms of assessment for students to demonstrate their knowledge*, described in the Alaska Standards for Culturally Responsive Schools (n.d.). This practice can be considered culturally responsive because of its very acknowledgement that academic readiness and ability are more complex than what one exam can demonstrate, particularly when

considering the ongoing social adaptation and linguistic development of ELs. Though most districts in Florida referenced the same placement and exit assessments, mentions of discrete assessments and their corresponding types (academic, linguistic, social, etc.) were coded and reported; the researcher then compared frequencies across each district. It is important to note that more formal assessments, particularly high-stakes assessments, are not being implied as better – however, the researcher looked for careful consideration of the assessments chosen (whether formal or informal), awareness of what they are intended to measure, and strategic use of multiple assessments to better understand the performance and needs of the EL.

Seventh was *Availability of staff from similar cultural backgrounds* (Alaska Standards for Culturally Responsive Schools, n.d), which did not consist of any additional inclusion criteria; however, this code did not equate mentions of bi/multilingualism of staff with cultural awareness. Any indications of school employees being from other countries (the same as or similar to those represented by the student body) or indications that counselors or paraprofessionals from differing cultural backgrounds could be made available to the students and their parents were coded and reported by the researcher.

The eighth a priori code, in the same vein as the seventh, was *Accessibility of documents and translators for represented home languages*. This is not a recommendation introduced by any one scholar in particular and is instead a common feature across the literature on CRP. It is, in fact, already included as a prompt within the FLDOE 2016-2019 ELL Plan template on more than one occasion. Additional mentions offered by each district were coded and frequencies tallied, as previously, but the quality of the provisions made available by each district were also critically assessed. How many languages had the Home Language Survey (HLS) been translated into, for example? What translation assistance was available? Was bi/multilingualism encouraged and present among the staff? In Florida, it is required for a bilingual paraprofessional

to be hired when fifteen or more students speak the same L2 (FLDOE, 2015), but this would be the bare minimum provision in all of the high-ESOL population districts selected for this study.

Ninth – and final – was the *Promotion of diversity as an asset and support of cultural preservation* (Chamberlain, 2005; Brown, 2007; Richards et al., 2007). Any mentions of the following were considered relevant to this particular code:

- Multicultural nights or events that celebrate the cultures of the students (Brown, 2007)
- Explicit expression of the district's desire to value and preserve the home culture(s) of their students (Chamberlain, 2005)
- Encouraging teachers to learn about the histories, experiences, and cultural practices of the diverse groups represented within their classrooms (Richards et al., 2007)
- Workshops for teachers, students, and/or parents that promote an appreciation of diversity (Richards et al., 2007)

APPENDIX D
PRACTITIONER INTERVIEW PROTOCOL

ON-SITE PRACTITIONER INTERVIEW PROTOCOL

Data	**Question**	**Prompts & elicitations**
Background and ice breakers	Before I start with my questions, tell me a little bit about yourself – only things you are willing to share.	How long have you been working here? How do you feel about your job? Why did you choose this school/grade level/subject/etc.?
Knowledge of ELL policies and provisions (*relevant for first two RQs*)	Are you familiar with the 2016-2019 District ELL Plan?	Are copies readily available for instructors? Do you feel as though the described procedures represent what actually happens? (Be more specific with items of interest) Are there any additional provisions you are aware of at your school not included in the plan?
Professional Development (*RQ 2*)	Describe the ESOL-related professional development experiences at your school.	Is this PD part of your district requirements? Any additional comments about PD?
Culturally relevant pedagogy and school environment (*RQ 3*)	Do you feel that the material you instruct is accessible to your ELs? How do they respond?	Is there anything you would change about the recommended pedagogical practices or curriculum? How would you describe the environment at your school?
Fidelity Assurance	Describe the compliance procedures at your school to ensure instructors are following policy.	Any additional comments/thoughts?
General thoughts and opinions of required practice (*RQ 2*)	How do you feel about the school's support of ESOL students and their instructors?	Is there anything that stands out to you? Positive/negative experiences? Would you make any changes to recommended practices? Anything else to comment on?
Member checking	Paraphrase what I heard about the main data: 1. Background and motivations 2. Knowledge of policy and additional "unofficial" provisions 3. Professional development opportunities 4. Cultural support 5. Fidelity and compliance 6. Final thoughts	Is there anything else you would like to add or to ask me?

APPENDIX E
SITE VISIT OBSERVATION INSTRUMENT

SITE OBSERVATION INSTRUMENT

***School #:**

Date:

***Length/times of visit*:**

**Site list was kept separately; observation documents include a number that corresponds with the site in order to ensure confidentiality of all information.*

Observations were very general and consisted of writing down anything of interest in the left column of the table and later reviewing and reflecting upon that information in the right-hand column.

Time/Location indicator	***Descriptive Observations***	***Reflective Notes***

Number of cells continued as needed.

APPENDIX F
INTERVIEW CONSENT LETTER

INFORMED CONSENT / EXPLANATION OF RESEARCH

Title of Project: *Cultural Responsiveness and K-12 ESOL Students: Exploring Policy and Implementation Fidelity*

Principal Investigator: *Lauren Raubaugh, M.A.*

Faculty Supervisor: *Dr. Kerry Purmensky (Dissertation Chair)*

You are being invited to take part in a research study that comprises part of a doctoral dissertation. ***Whether you take part is up to you.*** You have been selected because of your status as a current K-12 public school teacher in the state of Florida.

The researcher will visit two public schools within the same county and interview 1-2 teachers at each of those schools, so there will be fewer than 4 participants. However, confidentiality measures (further described below) will ensure that your personal identity and school location will not be tied to your responses.

- The purpose of this research is to explore ESOL policy and practice within Florida's schools in order to develop a more comprehensive understanding of both its successes and potential flaws; the ultimate goal is to help both ESOL students and their teachers.

- Your participation is entirely voluntary. There will be no benefits offered, but your input as a K-12 instructor in the state of Florida would be greatly appreciated.

- WITHDRAWAL/REFUSAL: Non-participation in the study OR the decision to cancel/withdraw your interview from the collected research data **will not result in any consequences or penalties** and is completely within your right.

- The researcher will do everything possible to **minimize any potential risks**, which could include discomfort with personal questions or fear of your answers being shared with your coworkers. You are more than welcome to stop the interview and/or not answer questions that you would prefer not to.

- Research will consist of a brief, **confidential** interview regarding your experience as an instructor within your school and your perception of current ESOL policies and provisions. Questions are simple, and no personally-identifiable information will be collected.

- If you agree to take part in this study, you will only be interviewed ONCE; it should take no longer than 15-20 minutes, and the researcher would be happy to work around your schedule and availability.

    - No direct interaction will occur between the researcher and your students.

    - Interviews **WILL BE RECORDED** by the researcher. Audio files will be stored on a private, password-protected computer and deleted after the termination of the study. If you would prefer not to be recorded, please indicate so on the following page. Another means of transcription could possibly be arranged.

- **PLEASE NOTE**: **Neither your name nor the name of the school will be included within the study or the recording**. I will not record our introductions, and you will be assigned a pseudonym at the start of our audio recording.

- Informal observations of the school environment (not within classrooms) and the collection of documents readily available around the school will also occur, though these will be casual and not require your direct involvement.

- **The only person who will have access to the recorded interview is the researcher**. Transcriptions and data analysis may be accessed by the dissertation committee; however, these data will not include any personally-identifiable information.

Study contact for questions about the study or to report a problem: If you have questions, concerns, or complaints, please contact:

- **Lauren Raubaugh, PhD candidate in TESOL**
  College of Community Innovation and Education
  (304)-240-8529 or by email at lauren.raubaugh@ucf.edu

- **Dr. Kerry Purmensky, Assistant Professor and dissertation chair, TESOL**
  Department of Modern Languages and Linguistics
  (321)-948-7182 or by email at kerry.purmensky@ucf.edu

You will be audio-recorded for an interview during your participation in this study. The audio recordings will be used for research purposes only and your identity will not be disclosed. Only the researcher will have access to the audio recordings, and all recordings will be stored on a private, password-protected computer and deleted after the termination of the study. Transcribed interviews and analysis will be accessible to the dissertation committee, but no personally-identifiable information will be included within those transcriptions. Your name and the name of your district and school will not be recorded at all and you will be assigned a pseudonym.

Please check one of the boxes below and initial:

□ I agree to be audio-recorded. Initials _____

□ I do not want to be audio-recorded.* Initials _____

If you select the second option, please indicate whether you would be open to being interviewed and having your answers live-typed or recorded by hand rather than recorded:

□ Yes, I agree to have my interview transcribed rather than audio-recorded. Initials _____

□ No, I do not want to be interviewed at all. Initials _____

IRB contact about your rights in the study or to report a complaint: Research at the University of Central Florida involving human participants is carried out under the oversight of the Institutional Review Board (UCF IRB). This research has been determined to be exempted from IRB review unless changes are made. For information about the rights of people who take part in research, please contact: Institutional Review Board, University of Central Florida, Office of Research & Commercialization, 12201 Research Parkway, Suite 501, Orlando, FL 32826-3246 or by telephone at (407) 823-2901.

BY SIGNING THIS FORM, I AGREE TO TAKE PART IN THE RESEARCH DESCRIBED IN THIS CONSENT FORM. THIS MEANS I AM CONSIDERING MYSELF ELIGIBLE TO PARTICIPATE IN THIS RESEARCH OPPORTUNITY.

_____ _____

Signature of participant Date

_____

Printed name of participant

APPENDIX G
INSTITUTIONAL REVIEW BOARD (IRB) APPROVAL LETTERS (ORIGINAL AND UPDATED)

ORIGINAL APPROVAL (OLD SYSTEM)

University of Central Florida Institutional Review Board
Office of Research & Commercialization
12201 Research Parkway, Suite 501
Orlando, Florida 32826-3246
Telephone: 407-823-2901 or 407-882-2276
www.research.ucf.edu/compliance/irb.html

Determination of Exempt Human Research

From: **UCF Institutional Review Board #1**
FWA00000351, IRB00001138

To: **Lauren Raubaugh**

Date: **October 24, 2018**

Dear Researcher:

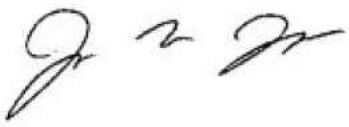
On 10/24/2018, the IRB reviewed the following activity as human participant research that is exempt from regulation:

Type of Review:	Exempt Determination
Project Title:	K-12 ELL Students: Exploring Policy and Implementation Fidelity in Florida
Investigator:	Lauren Raubaugh
IRB Number:	SBE-18-14468
Funding Agency:	
Grant Title:	
Research ID:	N/A

This determination applies only to the activities described in the IRB submission and does not apply should any changes be made. If changes are made and there are questions about whether these changes affect the exempt status of the human research, please contact the IRB. When you have completed your research, please submit a Study Closure request in iRIS so that IRB records will be accurate.

In the conduct of this research, you are responsible to follow the requirements of the Investigator Manual.

This letter is signed by:



Signature applied by Racine Jacques on 10/24/2018 10:57:31 AM EDT

Designated Reviewer

UPDATED APPROVAL (MINOR REVISIONS UNDER NEW SYSTEM)

UNIVERSITY OF CENTRAL FLORIDA

Institutional Review Board
FWA00000351
IRB00001138
Office of Research
12201 Research Parkway
Orlando, FL 32826-3246

EXEMPTION DETERMINATION

January 11, 2019

Dear Lauren Raubaugh:

On 1/11/2019, the IRB determined the following submission to be human subjects research that is exempt from regulation:

Type of Review:	Initial Study
Title:	K-12 ELL Students: Exploring Policy and Implementation Fidelity in Florida
Investigator:	Lauren Raubaugh
IRB ID:	STUDY00000070
Funding:	None
Grant ID:	None

This determination applies only to the activities described in the IRB submission and does not apply should any changes be made. If changes are made, and there are questions about whether these changes affect the exempt status of the human research, please contact the IRB. When you have completed your research, please submit a Study Closure request so that IRB records will be accurate.

If you have any questions, please contact the UCF IRB at 407-823-2901 or irb@ucf.edu. Please include your project title and IRB number in all correspondence with this office.

Sincerely,

Racine Jacques
Designated Reviewer

APPENDIX H
ALL DISCRETE DISTRICT ASSESSMENTS (CODE 6)

Code 6: Multiple Forms of Assessment for Students to Demonstrate their Knowledge

Discrete mentions of assessments and their corresponding types (academic, linguistic, social) are documented here. Exact wording was taken into account when tallying. Multiple tallies in one box were differently worded.

	Somerset	Frederick	Worcester	Allegany	Cecil	Carroll	Howard	Talbot	Calvert	Montgomery	Kent	Charles	Total Districts (/ 12)
WIDA ACCESS 2.0	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	12
FSA ELA		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	11
Student interview	✓	✓	✓	✓	✓	✓		✓	✓	✓	✓		10
Staff recommendations	✓	✓✓		✓✓✓	✓	✓✓	✓	✓	✓✓	✓	✓		10
Transcripts	✓	✓	✓	✓	✓	✓	✓	✓	✓			✓	10
Classroom performance	✓	✓	✓	✓	✓		✓	✓	✓			✓	9
Extent of prior educational experience	✓✓	✓		✓	✓	✓		✓		✓✓	✓	✓✓	9
Parent interview	✓		✓	✓	✓	✓		✓	✓	✓		✓	9
School records		✓	✓	✓	✓	✓	✓	✓		✓		✓	9
Grades from current or previous years	✓	✓			✓	✓	✓	✓	✓	✓	✓		9
Programmatic Assessment	✓	✓	✓		✓		✓	✓	✓	✓	✓		9
District-specific assessments	✓	✓	✓✓	✓✓	✓✓	✓		✓				✓	8
iReady	✓	✓	✓			✓	✓	✓	✓	✓			8
Report cards	✓		✓		✓	✓	✓		✓		✓	✓	8
IPT Oral/Aural		✓		✓	✓	✓	✓	✓				✓	7
IPT Reading/Writing		✓		✓	✓	✓	✓	✓				✓	7

	Somerset	Frederick	Worcester	Allegany	Cecil	Carroll	Howard	Talbot	Calvert	Montgomery	Kent	Charles	Total Districts (/ 12)
Student portfolios	✓	✓	✓	✓		✓	✓			✓			7
Teacher input			✓	✓	✓		✓		✓		✓	✓	7
EOCs			✓			✓		✓	✓		✓		5
Criterion-referenced standards		✓			✓	✓	✓				✓		5
SAT			✓	✓						✓	✓		4
FCAT		✓	✓	✓			✓						4
ELL Committee recommendations		✓	✓					✓			✓		4
WIDA Screener	✓				✓		✓						3
IDEA Proficiency I	✓	✓							✓				3
IDEA Proficiency II	✓	✓							✓				3
FAIR	✓				✓					✓			3
Semester/course exams				✓		✓					✓		3
Imagine Learning	✓	✓	✓										3
Student work samples		✓			✓				✓				3
WIDA MODEL	✓						✓				✓		3
Online CELLA				✓						✓			2
Running Records	✓		✓										2
IStation	✓	✓											2
Formatives		✓									✓		2
Progress reports									✓		✓		2
Transcript notes	✓					✓							2

	Somerset	Frederick	Worcester	Allegany	Cecil	Carroll	Howard	Talbot	Calvert	Montgomery	Kent	Charles	Total Districts (/ 12)
Kaufman Test of Educational Achievement II	✓												1
Continuum of ESOL Placement Tests for Exceptional Students				✓									1
Pre-IPT								✓					1
IPT Spanish for Dual Language School					✓								1
LAS Links Reading/Writing			✓										1
ACT			✓										1
SESAT				✓									1
FSA practice tests										✓			1
NAEP											✓		1
ABAS-HC				✓									1
Florida Standards Quiz (FSQ)			✓										1
Reading Wonders					✓								1
Journeys					✓								1
Pearson assessments					✓								1
Discovery Ed							✓						1
STAR							✓						1
FASTER							✓						1
Aprenda			✓										1
Tejas Lee		✓											1
DynEd		✓											1

	Somerset	Frederick	Worcester	Allegany	Cecil	Carroll	Howard	Talbot	Calvert	Montgomery	Kent	Charles	Total Districts (/ 12)
Native language writing sample				✓									1
Social experience								✓					1
Student behavior (study habits, attendance, etc.)						✓							1
Annual reviews	✓												1
Written placement guide		✓											1
Other assessment results	✓✓✓✓✓	✓✓	✓✓✓	✓✓✓	✓✓✓	✓✓✓✓✓	✓✓✓	✓✓✓✓	✓✓✓✓	✓✓✓	✓	✓	12
District Totals	30	30	28	28	28	26	23	23	22	19	19	14	-
Total Mentions	290												

APPENDIX I
SOURCES OF DISTRICT ELL PLANS

SOURCES OF DISTRICT ELL PLANS

http://bcpsagenda.browardschools.com/agenda/01112/Item%20F-1%20(26505)/SUPP_DOCS/Exhibits/Doc2.pdf

https://www.collierschools.com/cms/lib/FL01903251/Centricity/Domain/136/16-639%20District%20English%20Language%20Learners%20Plan%202016-2019_Signed%20by%20Board.pdf

http://www2.sdhc.k12.fl.us/BoardAgenda/pdfs/BD20160906_777/Attch_20160906_146_000.pdf?GRN=1536524706565

https://www.manateeschools.net/site/handlers/filedownload.ashx?moduleinstanceid=7314&dataid=6852&FileName=Manatee%20ELL%20Approved%20Plan.pdf

https://www.martinschools.org/Page/8226

http://mdcpsbilingual.net/pdf/compliance/2016-2019_District_ELL_Plan.pdf

https://www.ocps.net/UserFiles/Servers/Server_54619/File/Departments/Multilingual/ELL%20Plan/ELL%20Plan%202016-2019.pdf

https://www.okee.k12.fl.us/_cache/files/9/3/930c3338-fe36-451b-90a3-168bfdb6aef6/3FA6FD921942FD5FB533C49CAEE3DBAD.final-ell-plan-2016-2019.pdf

https://www.palmbeachschools.org/multicultural/wp-content/uploads/sites/70/2016/04/Palm-Beach-ELL-Approved-Plan.pdf

https://www.polk-fl.net/districtinfo/departments/learning/esol/documents/DistrictELLPlan2016-2019.pdf

http://seminolecountyschoolfl.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=5753

“Calvert” (pseudonym): Accessed directly via site contact email; not readily available online.

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