



PreK Dual Language Learner Landscape Analysis and Needs Assessment: Availability of Language Access for LEP Parents and Caregivers

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**Carolina
Family
Engagement
Center**

Equity, Opportunity & Excellence in Education

- ▶ Housed in the SC School Improvement Council at the College of Education at USC.
- ▶ One of 20 federally-funded Statewide Family Engagement Centers under ESEA.
- ▶ CFEC families of focus include parents & caregivers of dual language learners.

Everyone Benefits When All Have Access to Early Childhood Education & Care

- ▶ High quality early care and education programs increase kindergarten readiness and improve longer-term outcomes.
- ▶ Dual language learners tend to be underrepresented in these programs but can benefit more when they do participate.
- ▶ Without language access, parents of DLLs who cannot communicate in English can have difficulty finding and participating in available programs for their child.

Project Overview

- ▶ Assistance provided by Migration Policy Institute (MPI)
- ▶ Examined need for and availability of language access services for parents/caregivers of DLL children enrolled in publicly funded early childhood education and care programs for children ages 3-5.
- ▶ Project funded through federal Preschool Development Grant (PDG) to South Carolina Department of Social Services and administered by SC First Steps.

- ▶ Our provider interviews and survey data indicate that many providers are aware of the need for, and desire to provide, language assistance to LEP parents/caregivers.
- ▶ Our parent focus groups and survey data indicate that some LEP parents/caregivers are receiving some language assistance services.
- ▶ A number of gaps remain, however. Closing these gaps will require:
 - ▶ a strategic, systematic, and collaborative approach
 - ▶ innovative solutions
 - ▶ support for providers
 - ▶ shared resources across system
 - ▶ shared responsibility among providers, agencies, and communities

Before We
Get Started

I. Laws, Regulations, and Policies

Language
Access Is A
Need for all
LEP Families –
Whether or
Not It's
Required

- ▶ South Carolina has a mixed delivery system with different funding sources and different types of providers.
- ▶ Laws, regulations, and policies addressing language access requirements are not uniform across the system.
- ▶ Results in uneven language access services among programs within system.

Federal Laws and Policies

- ▶ All early childhood education and care programs in the US that receive federal funding must provide **meaningful access** to all eligible children and families, including DLL children and their parents/caregivers who do not speak English.
 - Title VI of the Civil Rights Act of 1964
 - Supreme Court cases
 - Clinton Executive Order 13166 (August 2000)

Reach of Federal Requirement

The requirement to provide meaningful access covers both **direct recipients of federal funding**, such as state agencies, **as well as subrecipients** of those funds such as local government agencies and non-profit organizations.

This requirement also extends to **all parts of a recipient's operations**, not just the specific program or part that receives federal funding.

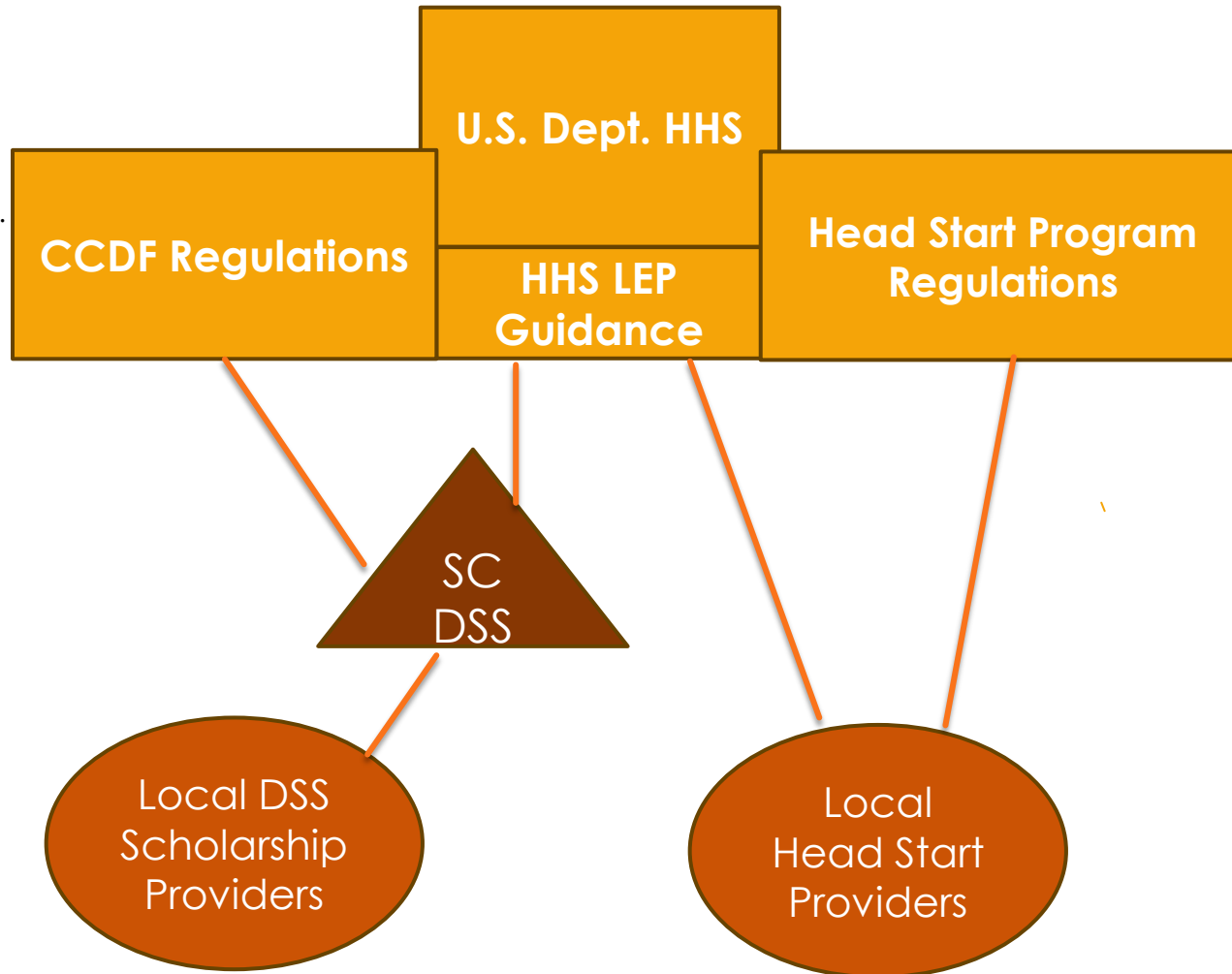
Options for Early Child Care and Education (Ages 3-5) in South Carolina

Head Start	Migrant and Seasonal Head Start Centers American Indian and Alaska Native Head Start Centers	CERDEP 4-K (SC Child Early Reading Development and Education Program in Public Schools)	First Steps 4K classrooms (CERDEP delivered by non-public-school providers including for profit, not-for profit, faith based, and other providers)	Child Care Scholarship Program (CCDF administered by SC DSS) (child care and education in ABC-quality qualified facilities).	Public School 3K and 4K funded by sources other than CERDEP.	Private child care and education (No public funding).

What Does Meaningful Access Require?

Meaningful access broadly requires the use of qualified and timely language assistance measures such as interpreting or translation of written materials to LEP individuals (principally parents and/or caregivers) in all stages of educational programs.
(Migration Policy Institute)

Meaningful Access



Specific Requirements Vary Depending on Funding Agency and Program

HHS/Child Care Development Fund Regs Directed to DSS Outreach Activities

HHS regs require that DSS State Plan for CCDF describe outreach to LEP families.

Plan provides that DSS will:

- ▶ offer application, informational materials, and website in other languages.
- ▶ provide bilingual caseworkers and outreach workers as well as partnerships with community organizations.
- ▶ fund Dual Language Learner Quality Coach position through SC CCR&R.
- ▶ maintain contract to provide interpretation and translation in over 100 languages.

HSS regs also encourage agencies to translate written documents into commonly spoken languages or utilize tag lines to advise of availability of language services.

Language Access at the Provider Level

Local DSS scholarship program providers must have a rating from the ABC Quality Rating and Improvement System (ABC). Language access included as an indicator of quality that is assessed in ABC process.

- ▶ “The program supports families by having a plan to communicate in their home language and providing policies and documents in their home language.” Examples of possible plan provisions include:
 - ▶ Translators/interpreters are sought from parents, staff, board members, and local colleges.
 - ▶ Teacher-supported strategies.
 - ▶ Forms of communication translated/interpreted in child’s home language (e.g. enrollment packets, handbooks, emails, and newsletters.)
- ▶ Evaluated based on documentation submitted by providers online. Reviews completed once every three years.

Compare with HHS Requirements for Head Start Providers

- ▶ Head Start administered directly by HHS.
- ▶ Recipients of Head Start funds are required to:
 - ▶ show evidence of planning to serve LEP families
 - ▶ use interpreters and the translation of written materials where appropriate.
- ▶ Language access for LEP families included in program reviews.
 - ▶ providers aware of importance of compliance with language access requirements to maintaining funding.

- ▶ Language in U.S. Justice Department guidance suggests that “**meaningful access**” requirement attached to federal funding for other programs reach all parts of School District and First Steps operations.

CERDEP 4K
and First
Steps 4K

How Meaningful Access is Understood in the K-12 context

Most detailed source of guidance is USDJ and USDE 2015 “Dear Colleague” letter and LEP Fact Sheet.

“School districts and SEAs have an obligation to ensure meaningful communication with LEP parents in a language they can understand and to adequately notify LEP parents of information about any program, service, or activity of a school district or SEA that is called to the attention of non-LEP parents.”

Registration and enrollment information

Parent Handbooks

Language assistance programs

Gifted and Talented programs

Student discipline policies and procedures

Requests for permission slips

Special education information

Parent/teacher conferences

<https://www2.ed.gov/about/offices/list/ocr/docs/dcl-factsheet-lep-parents-201501.pdf>

Additional best practices and considerations in SCDE 2023-24 *Title III Multilingual Learner and Immigrant Student Program Guiding Principles*.

SCDE Requirements Specific to CERDEP 4K

SCDE CERDEP Guidance addresses program recruitment practices.

- Suggests that districts “make communication accessible by having materials in other languages”

SCDE Office of Early Childhood and Literacy webpages includes:

- online CERDEP 4k registration packet and CERDEP Parent and Guardian Handbook in Spanish
- template for the Department’s home language survey in Spanish that includes opportunity for parents to indicate their preferred language for communication with the school.

First Steps 4K

- ▶ Guidance for First Steps 4K addresses language services for DLL children but does not address services for LEP parents.
- ▶ First Steps 4K application for the 2024-25 school year was translated into Spanish before posting (as opposed to relying on an app such as Google Translate to do the translation).
- ▶ Participates in Palmetto 4K and First Five SC that are available in Spanish.

Key Components of Effective Language Services

"Providing effective language services in the early childhood field would mean that LEP parents:

- ▶ have equal access to information about programs that are available to their families;
- ▶ would not face language-related barriers to applying for and enrolling in early childhood education and care programs; and
- ▶ over the course of participating in a program, would have access to day-to-day communications with program staff and to routine program information and resources on par with what is available to non-LEP parents."

Park, Maki, Jacob Hofstetter, and Ivana Tu Nhi Giang. 2022. Overlooked but Essential: Language Access in Early Childhood Programs. Washington, DC: Migration Policy Institute.

Selected Recommendations for Program Requirements and Recommendations

- ▶ The provision of language access services would benefit from a systemwide or state level approach to ensure assistance is available to all LEP parents regardless of which program or provider they choose or zip code they reside in.
 - ▶ Common recommended standards or best practices for agencies and providers?
 - ▶ Look to Head Start or K-12 school district regulations and guidance for models?
 - ▶ Clear guidance to providers on what effective language access looks like in their setting.
 - ▶ Stronger monitoring and accountability measures.

Selected Policy Recommendations

- ▶ Policies and guidance address providing appropriate levels of language assistance for LEP parents/caregivers speaking other languages as well as Spanish.
 - ▶ Families from Latin American countries, for example may not speak “standard” Spanish but rather Spanish dialects or languages indigenous to Latin America. Oral communication may be needed for those LEP parents/caregivers with low literacy skills in their home language.
 - ▶ Languages from countries in crisis such as Ukraine are also spiking.

Ideas for Collaboration to Increase Available Language Access Resources

State or regional entity contracts with vendor(s) for services such as telephone language lines or interpreters and makes service available to large numbers of local providers.

State or regional entity provides translations of commonly used documents in multiple languages and makes available to large numbers of local providers.

Create/collect materials that providers can use such as “I speak” cards or fact sheets on how to access/use translation and interpretation services and make available to large numbers of local providers.

Create tiered levels of qualifications required for interpreters based on the importance/complexity of the information/situation. Provide basic course on SC Endeavors to allow bilingual volunteers or staff to qualify to interpret in certain specified situations.

Outreach, Application and Enrollment

Suggested Components of State Agency LAP

1

All levels of pages on website will be accessible in Spanish or other languages – not just the home page.

2

Tag lines indicating that language assistance is available will be translated into commonly spoken languages as well as English

3

Information about program availability/options/assistance will be disseminated through informal networks utilized by LEP parents as well as online. LEP parent leaders will be trained to serve as navigators or guides for others in their networks.

4

Representatives of LEP parents will be directly involved in designing outreach plans.

- ▶ What percentage of enrolled children are DLL with LEP?
 - ▶ Head Start: Regulations require providers to report the primary home language for each child enrolled in the program through its Program Information Report (PIR) system.
 - ▶ DSS: HHS regulations require CCDF lead state agencies to report the primary home language for each child enrolled CCDF-funded programs but its not clear that this is happening.
 - ▶ Public School Districts/First Steps 4K: Available from SCDE for public schools. Not clear if First Steps collects this information.
- ▶ How many providers are providing language services? Where are they and what are they providing?
 - ▶ Inclusion of language access in ABC Quality Process could lead to better data on how many ABC-rated providers are providing language access services.

Work Toward
Improved
Data
Collection

Beyond the Scope of this Project but in Need of Further Review

**Language
assistance for
children when
evaluated for
intervention
services**

Thank You!

CFEC would like to acknowledge the assistance of:

Jacob Hofstetter, Associate Policy Analyst, MPI

Margie McHugh, Director, National Center on Immigrant Integration Policy, MPI

Katherine Habben, Research Associate, MPI

Myriam Torres, USC Clinical Associate Professor

Sarai Melendez, Independent Consultant

Jordan Rice, CFEC Project Manager

PreK Dual Language Landscape Analysis and Needs Assessment was supported by the Preschool Development Grant, Grant Number 49739004 from South Carolina First Steps.