

Date: May 19, 2016

To: Oregon Department of Education and Oregon State Board of Education Members

From: Dr. Wei-Wei Lou

Re: Proposed Program Budgeting and Accounting Manual (PBAM)

My name is Dr. Wei-Wei Lou. I am a first generation immigrant and my two children grew up in Beaverton as English as a Second Language learners. I've been an ESL administrator for over 10 years, and have recently retired. My current role is the Director of Policy for Oregon Council of Title III (ESL) Directors. I was also a member of one the advisory groups of HB 3499 to "develop uniform budget coding requirements and uniform reporting requirements to provide budget transparency for the spending of moneys received by school districts as provided by ORS 327.013 (1)(c)(A)(ii) for students in average daily membership eligible for and enrolled in an English language learner program under ORS 336.079."

During the development process of HB3499, there was understanding among school district officials that in the PBAM document:

- 1) the ELL codes are not descriptive enough with clear criteria; and
- 2) confusion exists around what can/should (versus can't/shouldn't) be coded as ESL expenditure.

On top of that, the current ESL budgeting code descriptions in the Program Budgeting and Accounting Manual (PBAM) are antiquated and do not reflect the complexity of the ESL spending structure.

During one of the two group meetings, many members of the advisory group who are current business officers in Oregon school districts expressed the same concerns about the confusion in the PBAM document and a desire for a guide that provides clear criteria about what expenditure should or should not be coded as ESL.

The proposed draft of the PBAM document includes the guidance that the Oregon Council of Title III (ESL) Directors recommended (Appendix E), and a new function code 2080 (page ??) with specific examples that will guide business officers and ESL staff to ensuring that all ELLs have adequate resources to learn and ELL families have access to language assistance and other services. The new function code 2680 includes the following examples:

- 2682 Hiring interpreters at parent meetings regarding student's behavior, academic progress, concerns, praises, disability issues, special education referrals, special education evaluations, and special education issues, and any other related issues regarding a student's well-being.
- 2683 Hiring translators to provide translation of vital district wide documents such as a cafeteria menu, suspension notices, enrollment forms, transportation schedule, bus stop changes, inclement weather announcements and notices, school closures, emergency announcements and notices, district administrator hiring, school boundary changes, and any relevant events.

As you can see from these examples, an ELL parent who does not read and understand English needs these important information translated so that they can find child care when schools are closed due to heavy snow which was never a factor in their home country; so that they do not wait for the school bus that will not come due to icy road; so that they can take their children to the correct bus stop; so that they understand the school cafeteria menu to avoid food allergies that might hurt their children's health; so that they can understand where their children go to school as a result of the school boundary change. While these situations are non-issues for English speaking parents, language assistance is vital to the health and learning of English language learners daily. To ensure the civil rights of all students, especially ELLs, the specific function codes (2680...) proposed in the PBAM document are critical.

I strongly recommend that the State Board of Education adopt the new function codes. Doing so will help us better collect data on how ELL dollars are spent and whether or not these investments are actually reaching and having an impact on ELL students. It is morally imperative for us to make the changes now.

I appreciate your attention to ensuring that students of all races and national origin backgrounds have equal access to adequate resources and thus have an equal opportunity to attain the academic success upon which our future depends.

Thank you.