What Are We Learning About Supporting English Language Learners in Ontario?

A 2020 research report examining the implementation of
ELL Policies and Procedures (2007)
in Ontario publicly funded
English-speaking school boards.

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Introduction

The increasing number of English language learners (ELLs) in Ontario's elementary and secondary publicly funded schools has been well documented. Ontario is the province of choice for over 50% of newcomers to Canada (Statistics Canada, 2017). As ELLs continue to be a constantly growing demographic, it is vital that school and system leaders and classroom educators develop and implement programs and services needed to meet their unique needs.

In 2005, the Annual Report from the Office of the Auditor General of Ontario noted that millions of dollars in grants for English as a Second Language (ESL) and English Language Development (ELD) were provided to school boards. However, information about whether students whose first language was not English were achieving appropriate proficiency in English was lacking. In addition, the report highlighted the considerable discretion that

school boards had in respect to programs and reallocation of ESL and ELD grant funds. One of the concerns, expressed in the report, was that this discretion increased the risk that students with similar needs would be provided with different levels of assistance, depending on which school or school board they attended.

In response to the concerns noted in the Auditor General's Annual Report (2005), the Ministry of Education (MOE), in consultation and partnership with a number of stakeholders, developed policies and procedures, curriculum, monographs, practical guides, assessment, tracking, and monitoring tools and user guide training materials. The 2007 policy, *English Language Learners ESL and ELD Programs and Services, Policies and Procedures for Ontario Elementary and Secondary Schools, Kindergarten to Grade 12 (ELL Policies and Procedures),* called for educators to develop and implement

programs and supports to promote academic achievement and successful outcomes for English language learners[1].

The Auditor General's Annual Report (2005) also stated that "teachers need tools for measuring the English proficiency of the ESL/ELD students on a periodic basis" (p. 155). In response, the MOE developed a resource, Steps to English Proficiency (STEP), designed to build K-12 educators' capacity for addressing the needs of ELLs. The STEP resource was aligned with the *ELL Policies and Procedures* (2007) document and intended to support its implementation (Ontario Ministry of Education, 2015). "STEP is a framework for assessing and monitoring the language acquisition and literacy development of English language learners across the Ontario Curriculum" (Ontario Ministry of Education, 2015, p. 4).

"STEP was developed to build capacity for:

- developing a student profile and determining student placement;
- supporting planning and programming decisions;
- implementing responsive differentiated instruction and assessment;
- selecting appropriate teaching and learning resources;
- making decisions regarding student participation in and support for large-scale assessment;
- engaging students in self-assessment and goal-setting;

- identifying possible special learning needs;
- providing students and parents with accurate indications of a child's level of English language acquisition and literacy development;
- determining discontinuation of ESL/ELD support;
- promoting reflective teacher practice;
- providing an opportunity to focus teacher reflection and professional dialogue" (Ontario Ministry of Education, 2015, p. 4).

The Ministry of Education also provided various support for the implementation of the *ELL Policies and Procedures* (2007) and the STEP framework including train-the-trainer professional learning sessions, symposiums, webcasts, and video series highlighting evidence-based practices from experts in the field. Additional implementation support included projects funded (beginning 2010) by the MOE through the Council of Ontario Directors of Education (CODE). A key area of focus for the project work has been the mobilization of STEP. Transfer payment agreements between the MOE and CODE over the past several years have included the secondment of Project Leads and an application process for boards to apply for funding to engage in professional learning based on identified local needs. The Project Lead(s) has typically consisted of 1-2 full time educators who held system positions within a school board as an ESL/ELD co-ordinator. The role of the Project Leads

under the transfer payment agreements included responsibilities for supporting policy implementation, building capacity of K-12 educators through targeted professional learning, and mobilizing the use of MOE created supports and resources. The funding provided through an application process to individual school boards, under the same transfer payment agreements, was targeted to further support policy implementation by allowing boards to identify a project focus that would best support their unique and individual needs. Participants also have networking opportunities to share their learning with educators in similar positions, supporting ELLs, in other boards.

The purpose of this study was to describe how components of the *ELL Policies and Procedures* (2007) are being implemented in publicly funded English-speaking school boards throughout the province.

The intention of *ELL Policies and Procedures* (2007) was to "promote good outcomes for English language learners" (p. 7). However, as Fullan (2000) noted, reform as an intentional intervention through policy may or may not generate change. Policy needs to be purposefully implemented to the extent that the process changes education based on the policy objectives (Organization for Economic Co-operation and Development, 2017). Therefore, this study's aim was to understand how components of the policy are being enacted in schools across Ontario. This project was not intended to be an audit, rather it was intended to describe how educators view, understand, and engage in *ELL Policies and Procedures* (2007) implementation and to determine what we are learning about supporting English language learners in Ontario's publicly funded English-speaking schools.

Literature Review

Fullan (2015) defined education policy implementation as "the process of putting into practice an idea, program, or set of activities and structures new to the people attempting or expected to change" (p. 87). The Organization for Economic Co-operation and Development (OECD) defined education policy implementation as "a purposeful and multidirectional change process aiming to put a specific policy into practice and which may affect an education system on several levels" (2017, p. 10). In the first part of this literature review, research regarding the implementation of educational policies and programs in school districts in Ontario is summarized. Highlighted are the factors that influence implementation. Next, available research regarding policies and resources that were designed specifically to support English language learners in Ontario is reviewed. In the final section, nine critical factors that

affect policy implementation identified by Fullan (2015) are outlined.

Studies of Ontario Education Policy and Program Implementation

There were few published studies that examined the implementation of education policy in Ontario. Included below are summaries of studies that were retrieved through searches from databases including the Educational Resources Information Center (ERIC), Academic Search Complete, Canadian Reference Centre, and Open Dissertations.

Allison and colleagues (2016) conducted a study to determine the fidelity of implementation of the *Policy/Program Memorandum No. 138: Daily Physical Activity* (DPA) in elementary schools in Ontario. This policy required school boards to ensure that all elementary students

received a minimum of twenty minutes of sustained physical activity each school day. The researchers noted incomplete and inconsistent DPA implementation based on a random sample of 209 school administrators and 307 classroom teachers. Only 61.4% of the administrators surveyed indicated that their school was meeting the policy requirements. In contrast, only 50% of teachers reported fidelity at the classroom level.

Allison et al. (2016) noted several factors to be significantly associated with implementation fidelity of DPA at both the school and classroom level. These included greater awareness of the policy requirements, scheduling (there was greater implementation if DPA was scheduled into teachers' timetables), monitoring (schools that had monitoring procedures were more likely to have implementation fidelity), and the use of resources and supports. In addition, educators' perceptions that the policy was realistic and achievable mattered. Only 43% of teachers perceived the DPA policy to be realistic and achievable but those who felt it was reported greater fidelity than those who did not. Allison et al. (2016) also noted that teachers who reported higher self-efficacy for planning and implementing DPA also were more likely to report higher levels of implementation. Barriers to implementation cited in this study included competing curriculum priorities, lack of time, lack of teacher readiness, and lack of space. The more prominence teachers attached to these perceived barriers, the less likely they were to implement.

Burm (2019) studied the experiences of Indigenous Education Leads through

stories of policy enactment and approaches to fulfilling the mandate outlined in the *Ontario First Nation, Metis, and Inuit Education Policy Framework* (2007). Burm (2019) noted that substantial progress has been made since the release of the policy and highlighted the significant role of the Board Leads who were designated to work closely with senior administration in supporting policy implementation. The researcher noted however, an "unwillingness on the part of certain policy actors to engage authentically with the framework" (p. 80) as an inhibitor to what Board Leads could and could not do as policy enactors.

Cheung (2017) studied the implementation of *Growing Success: Assessment, Evaluation, and Reporting in Ontario Schools* (2010) and noted inconsistencies across subjects and schools. Factors that impeded implementation included the poor quality of professional development, lack of administrator support, differences in interpretation of the document among teachers and administrators, and a disregard for assessment practices by students, teachers, and guardians. Furthermore, the participants interviewed by the researcher did not believe that the policy was beneficial to student learning and success. A marks-oriented attitude on part of the students and parents discouraged the benefits of assessment practices. And finally, time was a large factor in impeding successful implementation. It was noted that teachers were not given time and, in some cases, were not even given the documents until well after implementation was to have taken place.

Segedin (2018) conducted a study to understand how the implementation of the *Specialist High Skills Majors* (SHSM) program impacted student outcomes and if it aided in high school completion. In addition, the researcher sought to understand methods that were most effective for successful program implementation. Strong leadership was found to affect program implementation, and in turn, student outcomes. Segedin (2018) concluded that district and school leaders who exhibited importance in the program by their involvement in it, were ranked higher than those who did not. "Involved leaders also appeared to inspire their staff, and SHSM teacher leaders' involvement" (Segedin, 2018, p. 489).

Bajovic, Rizzo, and Engemann (2009) studied implementation of the Ontario Ministry of Education's discussion paper designed to guide the implementation of character education in K-12 public schools within the province, *Finding Common Ground: Character Development in Ontario Schools K-12* (2006). The researchers noted that because the paper lacked a clear definition of 'character' educators would likely be led in many directions which may or may not result in the development of positive character. In addition, the researchers concluded that without clearly defined research-based strategies for implementation, "educators will be left to trial-and-error attempts, making success regarding character education implementation random rather than intentional and reproducible" (Bajovic, Rizzo, & Engemann, 2009, p. 19).

The first of three studies included in this literature review that examined the *Primary*

Class Size (PCS) Reduction Policy was conducted by Bascia and Faubert (2012) over a two-year period in Ontario. The researchers did not identify barriers to policy implementation, rather they considered how to strengthen the link between reduced class sizes and improvements of student learning by examining the interrelated dynamics between PCS and other educational policies. They noted that there were other changes happening in primary grade classrooms at the time of PCS reduction that affected what class size reduction meant and could achieve (e.g., more resources to support special education in regular classrooms). In addition, the researchers noted that PCS reduction led to unintended consequences for the effects of other policies (e.g. school administrators opting to create combined-grade classes in order to manage the 'hard cap' required by PCS). The researchers noted that neither district- nor school-level administrators they interviewed could "articulate an academic basis for this practice and many teachers and parents believed it was detrimental to student learning" (Bascia & Faubert, 2012, p. 353).

Mascall and Leung (2012) also studied the implementation of the *Primary Class Size (PCS) Reduction Policy* and concluded that school boards with greater resource capacity were able to "coordinate local implementation of PCS to ongoing efforts to improve teaching and learning; those with less were unable to manage more than compliance" (p. 311). The researchers described a district's resource capacity as dependent upon the quantity and quality of available resources, the appropriateness of the resources for the job, as well as

educator's ability to use the resources effectively. They noted that "human resources, time, funding, facilities, educational materials, and expertise—and the relationships among them—are all necessary ingredients" (Mascall & Leung, 2012, p. 312) for greater resource capacity. Factors that influenced a district's resource capacity included: (a) the history of available resources (had the district had access to resources for many years?); (b) the geographic concentration of the population (high concentration in urban areas result in higher resource capacity, while low concentration in remote rural areas might result in low resource capacity); and (c) the demands of a diverse student population (communities with high English language learning or special education needs may have lower resource capacity).

 Mascall and Leung (2012) acknowledged that although PCS was "indeed implemented successfully in every district in Ontario (that is, class sizes were reduced in primary grades, its impact on teachers and students was not as positive as it might have been" (p. 311). School boards with less resource capacity complied with the policy however, it wasn't authentically enacted. In addition to a district's strong resource capacity, Mascall and Leung (2012) also noted the impact of collective efficacy on successful implementation. In comparing and contrasting the implementation of PCS within two school districts, the researchers noted the more successful district was characterized by "confidence in their ability to rise to any difficulties along the way and to improve student learning (high district efficacy)" (p. 319). The less successful district was characterized by "low and declining

funding, with little or no time in the work day to address additional demands, an inability to attract and retain talented teachers in remote communities, and little optimism about their ability to improve their situation (low district efficacy)" (Mascall & Leung, 2012, p. 319). Finally, the researchers noted that the outcomes in the more efficacious district included the connection of PCS policy to other work underway to improve student literacy at the primary level while no such connections were made in the less efficacious and under resourced district.

In the third study that examined *Primary Class Size (PCS) Reduction*, included in this literature review, analyzed principal's perspectives. Flessa (2012) sought to understand what school leadership required under a policy like PCS and to make sense of the ways principals' work shifted and changed according to particular policy expectations. The researcher noted that PCS was implemented with remarkable fidelity across the province and that principals in different schools were doing similar things in relation to enacting the policy. The researcher also noted that the nature of the PCS policy included clarity (class size targets) and mechanisms for public reporting which required and rewarded the traditional leadership role of 'principal as manager'. When asked to describe the policy, principals perceived PCS as requiring a hard cap but not necessarily related to other kinds of leadership (namely leadership that focused on instructional improvement). The consistent theme, the researchers suggested signals messages principals "received from the province regarding PCS were less about learning goals than they

were about grouping students by units of 20" (Flessa, 2012, p. 340). The researcher concluded that the principals' work shaped in relation to PCS policy required them to attend to the "simple, countable, and easily defined" (p. 341) rather than the complex realities of teaching and learning. The context of clear rules and based on the managerial nature of the policy, the researcher concluded it made it easier to implement the policy with fidelity.

Milne and Aurini (2017) also argued that the structure of policy formation informs its implementation in a study that examined how staff perceived the *Progressive Discipline and School Safety Policy* (Bill 212). The researchers noted the inherent flexibility and vagueness of the policy led to inconsistent policy implementation and unequal outcomes for students. The researchers considered the implications of policies that are "tightly coupled" or "loosely coupled" in terms of implementation. "Tightly coupled" referred to policies that were more "centrally controlled, rigid, and decisive" while "loosely coupled" referred to policies that leave room to be "locally managed, flexible, and based on an evolving logic of students' individual circumstances and learning needs" (Milne & Aurini, 2017, p. 31). In interviewing a variety of stakeholders, the researchers examined educators' knowledge and perceptions of and experience with disciplinary policies and how Bill 212 was applied and practiced. In relation to accountability, it was concluded that the loose coupling of the Progressive Discipline and School Safety Policy left room for school board and staff with few tools to evaluate its effectiveness. The researchers also concluded that the "spirit

of the policy is not followed since there are few feedback mechanisms that may expose inconsistent practices" (Milne & Aurini, 2017, p. 37).

In the studies presented above, there are a number of common themes regarding factors that influence the fidelity of implementation of education policies in Ontario schools. These included the availability of resources and support, teachers' individual and collective efficacy, teachers' perceptions regarding the alignment between policy mandates and their personal beliefs about effective pedagogy, educators' awareness and understanding of the policy, clarity and perceived practicality of the policy, structure of the policy, time, readiness, and opportunities to participate in high-quality professional learning. A review of the literature that is specific to implementation of policies and resources that were developed specifically to support English language learners (ELLs) is presented in the section that follows.

Studies of the Implementation of Ontario Education Policies and Programs Specific to English Language Learners

There were even fewer studies that examined the implementation of policy specific to supporting English language learners in Ontario school boards. Included below are summaries of two studies that were retrieved through searches from databases including the Educational Resources Information Center (ERIC), Academic Search Complete, Canadian Reference Centre, and Open Dissertations.

Lara and Volante's (2019) study examined the extent to which Ontario's provincial education policies, guidelines, and strategies respond to the needs of immigrant students within the K-12 public education system. This research involved a qualitative content analysis of all the MOE policy documents relating to education and integration of immigrant children. The researchers noted that for the most part, the MOE has established the necessary educational support measures to integrate immigrant students but noted a number of concerns that policy has left "open to interpretation" (Lara & Volante, 2019, p. 15).

They posed the following several questions as examples:

- "What specific modifications or accommodations should be done in order to establish a curriculum that enables students to see themselves represented in?
- Should the *Student Success Team* and *Student Success Teacher* receive any specific training in order to directly support immigrant students who are experiencing difficulties graduating?
- What kinds of adaptations and/or modifications should teachers pursue in order to support immigrant students in classrooms?
- How should schools provide information regarding antiracism and antidiscrimination to students and parents in order to increase their understanding of equity and inclusive education?
- How should schools ensure that immigrant parents have the necessary skills, knowledge and

tools in order to become part of their children's education, and what kinds of skills, knowledge, and tools is the ministry referring to?
- Will districts and schools consistently recognize the constellation of unique learning challenges faced by immigrant students in the absence of targeted and specific policies for this population?" (Lara & Volante, 2019, p. 15)

Lara and Volante (2019) noted that these unanswered questions required "schools to adopt a policy without clear guidance on how to execute their mandate" (p. 15) and cautioned that this might result in the failure of the policy or uneven implementation efforts.

Stille, Jang, and Wagner (2015) reported on teachers' perceptions of and experiences with the STEP proficiency scales. The researchers gathered multiple types of data that documented teachers' use of the STEP scales from 42 English as a Second Language (ESL) and classroom teachers and 159 students across three school districts in Ontario. The use of STEP and "its impact on teaching activities including teachers' understanding of students' language development, teachers' understanding of the role of instruction and feedback in language learning, and teachers' use of the scales to support diagnostic and formative purposes of assessment" (p. 11). Themes identified included STEP facilitated formative language assessment, the understanding of issues related to assessing and tracking language learning, and assessing language ability in content learning. Also, STEP supported professional learning by

"providing teachers with a common language and framework of reference, the scales increased the extent of meaningful collaboration and communication among teachers working with ELLs, particularly between ESL and mainstream or subject-area teachers" (Stille, Jang, & Wagner, 2015, p. 14).

Stille et al. (2015) noted that "district-level implementation and teachers' use of the STEP scales can potentially assist in building province-wide capacity" (p. 18) to meet policy requirements. The researchers pointed out that the initial purpose of STEP was to identify, monitor, and track the progress of ELLs however, over time the Ontario Ministry of Education "recognized that teachers' use of STEP could serve multiple purposes, including directing teachers' instructional goals and activities, guiding formative purposes of language assessment, supporting teachers' professional learning, and building system-wide capacity for supporting ELLs" (p. 18). They noted however, that in order to meet these multiple purposes, "teachers need the ability to use the proficiency scales to inform their instructional practice" (Stille, Jang, & Wagner, 2015, p. 19).

Themes gleaned from research regarding the implementation of policies specific to supporting the needs of ELLs are similar to the themes identified based on the implementation of other education policies in Ontario. Even though guides and resources to support policy implementation exist, additional clarity, guidelines and strategies for carrying out the policy objectives are needed, along with time and support. The Organization for Economic Co-operation and Development (OECD),

noted that "education policy implementation is a complex, evolving process that involves many stakeholders and can result in failure if not well targeted" (2017, p. 10). Therefore, it is important to understand factors that affect policy implementation. Fullan (2015) provided further insights by labelling and describing nine factors that influence policy implementation. Even though many of the factors that Fullan (2015) described had been previously captured in the studies above, it is worth revisiting them based on Fullan's (2015) conceptualization. They are not only important considerations for those who support policy enactment, but also important to understanding the findings and conclusions specific to this research study.

Nine Critical Factors That Affect Policy Implementation

Fullan (2015) identified nine interrelated factors that "influence implementation (or, more specifically, the extent to which teachers and students change their practices, beliefs, use of new materials, and corresponding learning outcomes) in the direction of some sought-after change" (p. 88). Fullan (2015) noted that if any or more factors are working "against implementation, the process will be less effective" (p. 88). These nine factors are summarized below.

Need. Even though a policy may be put in place by the government, it must be perceived as needed by district and school leaders and classroom educators in order for successful implementation to occur. There must be a clear fit between the policy and the identified and prioritized local needs. Not only must the policy be

perceived as needed, it must also be considered important in relation to other identified local needs (Fullan, 2015).

Clarity. When goals and practical strategies for achieving goals are not clearly articulated significant problems occur during the stages of implementation. Even though policies were developed over time, analyzed, revised, and carefully articulated by those who created them, there may be ambiguity regarding the goals and means of achieving goals by those who are expected to enact the policy. Fullan (2015) noted that "the more complex the reform, the greater the problem of clarity" (p. 90). Fullan (2015) also noted that policies that are too prescriptive stifle implementation and stressed the need to ensure that policies are "precise without being rigid" (p. 90).

Complexity. Fullan (2015) described complexity as referring to the "difficulty and extent of change required of individuals responsible for implementation" (p. 92) and identified three factors related to complexity when implementing education policies that are dependent on the starting point of individuals. These include: (a) the difficulty; (b) the skills required; and (c) the alteration of beliefs. When an individual's skills and beliefs align with the policy, the proposed change becomes less complex. Those who require the development of additional skills may find a policy more difficult to implement.

Quality and Practicality of the Program. Fullan (2015) stressed the importance of follow-up and preparation time necessary to create adequate materials in relation to perceived quality and practicality of the policy. When start up is too short to attend to matters of quality, implementation

suffers. Fullan (2015) noted the importance of whole-system capacity building that included a focus on collaboration, pedagogy, and system-ness in order to create specificity of action and commitment.

The District. Fullan (2015) stated that "the local school system represents one major set of situational constraints or opportunities for effective change" (p. 97). While individual schools are the unit of change, success depends on the strategies and supports offered at the district level. Fullan (2015) noted how districts develop "track records" (p. 98) when managing change and described how a district's track record at any given point in time represents "a significant precondition relative to the next new initiative" (p. 98). If teachers have had negative experiences with implementation in the past, regardless of the merit of the policy, teachers will be more cynical of future endeavours (Fullan, 2015).

Community Characteristics and Board Characteristics. Fullan (2015) noted how changing demographics can put increasing pressure on school districts to make certain adoption decisions before focusing attention on implementation. Also noted is the role that governing officials (school board trustees) can play in affecting implementation (e.g., hiring reform-oriented superintendents, actively working together with the district, etc.).

The Principal. The principal strongly influences the implementation of policy in schools. However, Fullan (2015) noted that "most principals do not play instructional or change leadership roles" (p. 99). Also noted

was how "principals' actions serve to legitimize whether a change is taken seriously (and not all changes are) and to support teachers both psychologically and with resources" (Fullan, 2015, p. 99).

The Role of Teachers. Individual and collective teacher factors play a large role in determining quality implementation. What influences these factors include psychological states, personalities, previous experiences, career stage, and sense of efficacy of the staff. The greater the efficacy, the greater fidelity of implementation.

The Ministry of Education. Fullan (2015) noted that factors affecting implementation must also place school districts and schools within the context of the broader society. Therefore, Fullan (2015) acknowledged the critical role that the Ministry of Education plays in developing the conditions for effective system-level reform (Fullan, 2015).

In order to strengthen the implementation of policy to support the needs of English language learners, this study aimed to describe how Ontario educators view, understand, and engage in *ELL Policies and Procedures* (2007) implementation. In the section that follows, the methodology and procedures for data collection and analysis are outlined.

Methodology
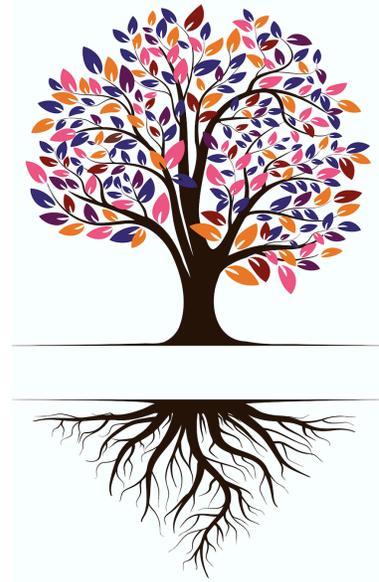
The purpose of this study was to determine what we are learning about supporting English language learners in Ontario's publicly funded schools. This study was not designed to identify supports that English language learners require in order to be successful. There is a body of evidence-based approaches documented through research (Cummins, Mirza, & Stille, 2012; Kim & Jang, 2009; Schecter, 2012; Stille & Cummins, 2013). Drawing on such research, the Ministry of Education has produced a number of practical guides and monographs that were created to assist educators in understanding the kinds of supports that ELLs require to learn English and the content of the classroom (including the *ELL Policies and Procedures* and STEP framework). Many current Ministry of Education policies have components that pertain to English language learners.

However, it was beyond the scope of this research to examine all of the MOE's policies. Therefore, the study aimed to describe how components of the *ELL Policies and Procedures* (2007) are being implemented in Ontario publicly funded schools and to describe how educators view, understand, and engage in *ELL Policies and Procedures* (2007) in relation to Fullan's (2015) nine critical factors that affect policy implementation.

This study was based on a qualitative approach. Creswell (2002) described qualitative research as "an inquiry approach useful for exploring and understanding a central phenomenon" (p. 58). Qualitative research for educational policy offers a nuanced understanding of the complexities at the level of policy implementation (Smit, 2003). Qualitative methodology was

appropriate to understand different school boards' unique experiences and levels of implementation regarding *ELL Policies and Procedures* (2007).

Data Collection and Analysis Procedures

Qualitative data consisted of information gathered from interviews, website scans, and texts and artifacts. The rationale and procedures for data collection and analysis for each of these sources, along with a description of the participants, are detailed in the section that follows.

Interview Data

In September 2019, the 60 English-speaking school boards were contacted (31 English public boards and 29 English Catholic boards) and asked to provide the names and contact information for the Superintendent responsible for ESL, the consultant and/or coordinator and board leads whose portfolio included ESL. In November 2019, a letter was sent to the Directors of Education from all 60 boards inviting an expression of interest to participate in the '2019-2020 CODE Project to Support English Language Learners'. Applications were received from 47 boards and each one was accepted. The expectation that participating boards would contribute to the knowledge gathering for this research project was stipulated on the acceptance of their applications. The applicants from the 47 boards provided a convenience sample of educators who were involved in initiatives aimed at meeting the primary objectives outlined in the *ELL Policies and Procedures* (2007). Fraenkel and Wallen (2003) described convenience

sampling as a type of non-probability sampling method where the sample is taken from a group of people who are easy to contact or reach.

From these 47 boards, 20 boards were contacted to participate in a semi-structured virtual interview in the spring of 2020. Interviews were conducted via Zoom Video Conferencing. The semi-structured manner allowed interviewees to fully explain their thoughts, understandings, and personal experiences with policy implementation. Participants were recruited through initial contact via email. The interviewees were selected based on the following criteria: (a) their defined role within their school board (e.g. Superintendents, Consultants/Coordinators and/or Board Leads whose responsibilities included English as a Second Language); (b) representation from both elementary and secondary panels; (c) representation of small, medium, and larger districts; (d) representation of English public boards and English Catholic boards. Relying upon interview data to draw conclusions about policy implementation from this sample presented a certain challenge however. Interviewees are the public faces of their school boards and therefore may feel inclined to ensure their responses are cast in ways that shed a positive light on their boards and their work. Conscious of this potential risk, all interviewees were ensured confidentiality to encourage greater freedom to respond. In addition, current and previous CODE Project Leads were asked to participate in an interview as well. These Project Leads have experience with policy implementation at a provincial level and therefore have extensive knowledge of policy enactment in Ontario school boards.

Each interviewee participated in one interview (in a few cases boards opted to include more than one person for the interview) which was conducted in a single individual session. Each interview lasted from 20 minutes to 45 minutes and differences in duration were based on the personality of the interviewee(s) and how much information they chose to share. The interviews were recorded on Zoom with prior permission obtained from the interviewee(s). The purpose of recording the interviews was to ensure correct and accurate transcription of the interviews for effective data analysis.

Open ended questions that helped to guide the interviews included the following:

- What are you and other educators at your board learning about supporting English language learners?
- What is going well in relation to the implementation of the *ELL Policies and Procedures* (2007)?
- What do you think are important considerations and suggested next steps to ensure better outcomes for English language learners?
- What (if any) concerns do you have about the implementation of the *ELL Policies and Procedures* (2007)?
- Is there anything else you're thinking about that you would like to share?

Website Scans

Secondary data collection included material that was made available by school boards on their websites. Benfield and Szlemko (2006) noted that the use of Internet to aid research practice has become more popular in the recent years. School board websites are one of the main sources of

communication used by districts. Researchers can use the content uploaded and made available to the public by school boards on their websites in order to determine communicational trends and patterns. In addition, school boards are expected to communicate board improvement plans to the public on their websites. Content analysis of school board's improvement plans would provide some information regarding adherence to the guidelines in the *ELL Policies and Procedures* (2007). For example, the policy states "As part of the Board Improvement Plan and the Student Success/Learning to 18 Action Plan, all boards will include a section that addresses the needs of English language learners" (p. 13). Accessing, downloading, and analyzing school boards' improvement plans would help shed light on the questions guiding this research.

In their report entitled 'Applying Content Analysis to Web-based Content' researchers Kim and Kuljis (2010) noted that "analyzing entire websites by human coders is extremely difficult, mainly because many websites consist of thousands of pages" (p. 371). Therefore, in order to ensure manageability and efficiency, the following procedures were employed. An Excel file was created and the names of the 60 English-speaking school boards were entered into the rows contained in the first column. Additional columns were labelled with the headings (Table 1) from the components outlined in the *ELL Policies and Procedures* (2007). Upon accessing each of the 60 school boards websites, links to their Board Improvement Plans was entered into the column on the spreadsheet. Board improvement plans were accessed and

scanned for references to English language learners. Key word searches were done for each school website in an attempt to identify evidence of the implementation of the components from the policy. Notes were made as to whether or not pertaining information was found.

Table 1. Website Scan Data Collection.

Requirement from the *ELL Policies and Procedures* (2007)
2.1.1. Board Improvement Plan to include a section that addresses the needs of English language learners.
2.2.1. School boards will develop protocols to define procedures and practices for welcoming ELLs and their families.
2.3 Procedure for ongoing language assessment.
2.3.3 Special Education protocol for ELLs.
2.8.2 Modifications to program reporting.
2.8.3 Interpreters/ information available in multiple languages.
2.9 Identification & Involvement in EQAO & OSSLT.
International students' info/recruitment.

Texts and Artifacts

Many of the 60 English-speaking school boards have voluntarily participated in project work over the course of the past several years. As noted earlier, the Ministry of Education provides the Council of Ontario Directors of Education (CODE) funding to support the implementation of the *ELL Policies and Procedures* (2007). Most of this funding is allocated to school boards through an application process. Every fall school boards can apply for a small amount of funding to engage in targeted professional learning for the

purpose of improving outcomes for ELLs. The large majority of the funding is allocated to provide release time for teachers. In many cases, school boards utilize a collaborative inquiry design for professional learning. Boards are able to allocate a small portion of the funding for resources as well. School boards have the support of a Project Lead throughout the year as they work on their projects. It is required that boards submit a final report documenting what they have learned and the impact resulting from their participation.

Final reports from the 2015-2016, 2016-2017, 2017-2018, and 2019-2020 years were located and stored locally on the researcher's computer's hard drive for the purpose of content analysis. Reports from the 2018-2019 school year were not examined because all of the projects that year focused on the continued field test of the Kindergarten Steps to English Proficiency (K-STEP) resource. In addition, it should be noted that very few reports from the 2019-2020 school year were received because participation was impacted by both job sanctions and COVID-19. An excel spreadsheet was created for the purpose of initial organization and to enable the researcher to determine which boards to select for a more detailed report analysis. Twenty-two boards were selected based on the following criteria: (a) boards had participated in project work for at least three of the four years; (b) representation of small, medium, and larger districts; (c) representation of English public boards and English Catholic boards.

The multiple sources of data (e.g., interview transcripts, website artifacts, and board

project reports) provided triangulation for this study. Creswell (2002) described triangulation as a "process of corroborating evidence from different individuals (e.g., a principal and a student), types of data (e.g., observational field notes and interviews) or methods of data collection (e.g., documents and interviews)" (p. 280). Creswell (2002) noted that triangulation "ensures that the study will be accurate because the information is not drawn from a single source, individual, or process of data collection" (p. 280). Procedures for data analysis are described in the section that follows.

Data Analysis Procedures

A deductive coding system was employed for each source of data. Deductive coding, as opposed to inductive coding, is conducted when the researcher already knows what themes he/she is interested in analysing (Creswell, 2002). The deductive coding system was based on the 'Components of the K-12 Policy for English Language Learners and ESL and ELD Programs And Services' *ELL Policies and Procedures* (2007) which included: Board Planning, Reception and Orientation of English Language Learners and Their Families, Initial Assessment of English Language Learners, Placement of English Language Learners, Programming for English Language Learners, Graduation Requirement for English Language Learners, Substitutions for Compulsory Credits, Ongoing Assessment, Evaluation, and Reporting, Identification and Involvement of English Language Learners in Large-Scale Assessments, Discontinuation of ESL/ELD Support, Appropriate Allocation of Resources to

Support English Language Learners, and English as a Second Language Teacher Qualifications and Professional Development. Each source of evidence was also reviewed based on Fullan's (2015) critical factors that affect policy implementation, outlined in the literature review. These included: need, clarity, complexity, quality and practicality of the program, the district, the principal, the teacher, the community, and the Ministry of Education.

The researcher transcribed each interview and created a Word document with headings representing each of the components of the *ELL Policies and Procedures* (2007). The researcher read and reread the interview data in order to analyze what information could be used to determine the degree of implementation for each of the policy components. The researcher then selected quotations from the interviews that fit best under the various policy components and placed them accordingly under the appropriate heading. For the website artifacts, the researcher examined documents for evidence of the policy components and noted items of interest in the spreadsheet. For the board project reports, data analysis consisted of the researcher reading through the reports submitted from the 22 selected boards numerous times. Themes and subthemes were identified and eventually saturation occurred. Saturation is described by Creswell (2002) as "the point where a theme is developed and detailed and no new information can add to its specification" (p. 273). Finally, once all of this information was organized and evidence was coded according to the components of the *ELL Policies and*

Procedures (2007), the researcher re-examined the data and considered it in relation to Fullan's (2015) critical factors. The findings from this study are presented in the section that follows. T he findings are organized according to each of the components in the *ELL Policies and Procedures* (2007). Following in the findings is a discussion, conclusions, and limitations of this study.
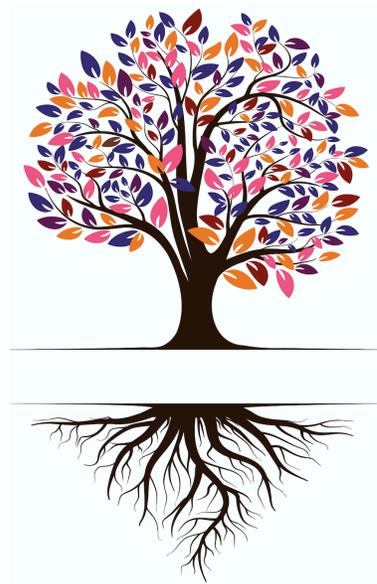
Findings

Policy Component 2.1 Board Planning

The *ELL Policies and Procedures* (2007) contains numbered statements that outline the mandated policy requirements that school boards and schools are required to meet. The first numbered statement is under the heading 'board planning' and reads: "2.1.1 As part of the Board Improvement Plan and the Student Success/Learning to 18 Action Plan, all boards will include a section that addresses the needs of English language learners" (p. 13). Of the 60 English-speaking school boards, 56 had 2019-2020 Board Improvement Plans posted on their websites. A few of these plans were multi-year plans. In the case of the four boards where a 2019-2020 Board Improvement Plan was not posted, the researcher examined previous Board Improvement Plans from the most recent year that was available.

Table 2. Number of Board Improvement Plans Not Including versus Including a Section that Addressed the Needs of ELLs.

Number of Board Improvement Plans that DID NOT include a section that addressed the needs of ELLs.	Number of Board Improvement Plans that DID include a section that addressed the needs of ELLs.
49	11

The 49 Board Improvement Plans that were categorized as 'not including a section that addressed the needs of ELLs' contained *no mention* of English language learners. Three of the forty-nine contained vague phrases that may have alluded to supporting ELLs.
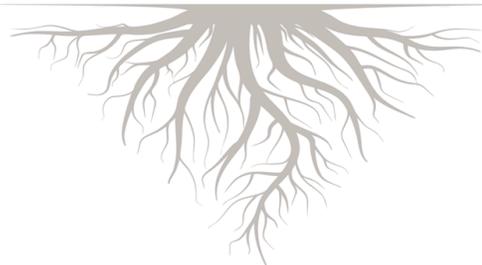
Examples of these phrases included:

- "Evidence of fewer gaps in student literacy."
- "Provide learning/work environments and student learning opportunities that are reflective of the diverse identities found within [school board name removed] communities."
- "Provide a welcoming learning environment that supports the diversity of learners."

Of the 11 Board Improvement Plans that were categorized as 'including a section that addressed the needs of ELLs', there was much variation in the way boards adhered to this specific policy mandate. The word 'section' as articulated in the mandate presented a bit of a problem during analysis because in many of the 11 instances that were included in this category, Board Improvement Plans did not contain a 'section' specific to ELL; many merely mentioned this sub-population and/or a vague reference to a strategy aimed to support ELLs. Instances in which English language learners were included in Board Improvement Plans appear in the table below.

Table 3. Examples of ELL Inclusion in Board Improvement Plans.

Example	Number of Mentions in Board Improvement Plans
SMART Goal related to ELL	2
Transparent reporting of specific progress for ELLs over time	1
Mention of ELLs in regard to resources (e.g., provide ELL supports for parents, STEP, etc.)	2
Mention of ELLs in regard to board initiatives/programs (e.g., create transition plans for ELLs, increase ESL Programs, expansion of orientation center, etc.)	5
Mention of ELLs in regard to monitoring/gap closing	1
Mention of ELLs in regard to professional learning opportunities (e.g., develop teachers' understanding of STEP, etc.)	3

Under the same category 'Board Planning' Component 2.1.2 of the policy reads: "Where a board already has in place a plan for English language learners, this plan shall be reviewed to confirm that it meets the requirements set out in this document" (p. 14). Interview data indicated that a few of the larger boards have undertaken reviews and some had recently formed ELL steering committees. However, the reviews that have been conducted in boards were in relation to *placement* and *programming* (which are addressed in sections 2.4 and 2.5 of the policy). Although the language that addresses the board reviews in the *ELL Policies and Procedures* (2007) reads "this plan shall be reviewed to confirm that it meets the requirements set out in this document" (p. 14), there was no mention by interviewees of the policy mandate to include a section that addressed the needs of ELLs in Board Improvement Plans. For example, one interviewee noted:

> "In the 2016-17 year we did a program review of our elementary program and we revised the classrooms so the students were no longer full time in an ESL classroom. They were only in the ESL classroom for English and math if needed."

Where reviews had not taken place, many of the medium and larger boards indicated that plans are in place for *program* reviews. For example, one interviewee noted:

> "I don't want to be a pessimist but I feel like I am. I am not actually convinced that the way we currently do things, in secondary anyways, I can't speak to elementary, is necessarily the best way to service our language learners. We were

> looking at, before COVID-19 hit, a total program review. A complete review of how we program for ELLs."

There were very few references to ELLs in only a handful of the 60 school board improvement plans. When ELLs were referenced, most plans did not list specific, actionable strategies for closing the gap between ELLs and students whose first language is English. Only 1 board improvement plan included disaggregated achievement data that demonstrated ELLs were progressing over time. In regard to board reviews, a few boards have undertaken reviews of their programs for ELLs but there was no evidence that these reviews included examining the extent to which all of the components outlined in the *ELL Policies and Procedures* (2007) have been implemented in districts.

Policy Component 2.2 Reception and Orientation of ELLs and Their Families

This policy component includes the development of protocols to "define procedures and practices for welcoming English language learners and their families and providing them with appropriate orientation to the Ontario school system, in the first language of the students and their families whenever possible" (*ELL Policies and Procedures*, 2007, p. 15).

When examining school board's websites, it was noted that more than half of the boards (N=32) posted information about admission procedures along with other information pertinent to registration specific to ELLs. In only a few cases however, was that information made available in a variety of languages. The quality of information

provided varied from one board to another. In some cases, information was very limited, unclear, and/or difficult to locate. For example, one board directed "students new to Canada (English language learners)" to "contact the Superintendent of Business" however, no name, link, or contact information was provided to aid them in doing so. In other cases, information was very thorough including Welcome Centre's hours of operation, available dates for assessments, registration procedures, documentation needed, contact names and contact information, links to interpretation and translation services, resources, etc.

In the analysis of artifacts from board projects reports, references to orientation and welcoming protocols occurred more frequently in the 2015-2016 and 2016-2017 reports. The analysis of interview data revealed that there are a variety of ways in which ELLs are received and oriented into Ontario schools. Reception and orientation of ELLs and their families is largely dependent on the location and size of the board. Larger boards in urban areas have had reception centres operating for many years. As one interviewee from a larger urban school board noted:

> "Since we've opened the Welcome Centre and expanded resources with settlement we've provided lots of different layers of support for ELLs. I feel like students' initial contact with the board is going very well. We have been collecting a little bit of data by surveying families after 3 months to get feedback about how they went through the Welcome Centre and how they are doing in schools. We plan to

do this also in 6 months and then again a year later."

Many small, rural boards do not have reception centers and in some cases, lack specific protocols for welcoming ELLs and their families into schools and communities. As one interviewee noted:

> "We have so few ELLs that when we did have a newcomer family arrive, the Principal at the school didn't know what to do."

And another interviewee noted:

> "I would describe us as just a white, English, rural board. We are small. We have less than 10 ELLs here. When we have a new student, I can guide Principals to say when the parent comes to register that child, here's the link but basically ask them these questions. Let's get some background and then I can support you better."

This evidence demonstrates that where the need was the greatest, that is in larger school districts, this aspect of the policy was quickly enacted by boards as they defined procedures and practices for reception and orientation of ELLs, including protocols for the accurate gathering of information for record keeping purposes. In school boards where the need was not as great or immediate, policy regarding the reception, orientation, and admission of ELLs and their families to schools has been slowly adopted and, in some cases, is addressed in the immediacy of the moment.

Policy Component 2.3 Initial Assessment of English Language Learners

This policy component states that "school boards will assign staff to assess the English language proficiency of all English language learners" (*ELL Policies and Procedures*, 2007, p. 17) and includes the provision of additional support for students with limited prior schooling and the development of a protocol for identifying ELLs who may have special education needs.

When examining school board websites, it was noted that some boards included information about the initial language assessment on their websites. Where information was made available, it was noted that initial assessments were sometimes conducted by educators with a variety of roles and responsibilities and not necessarily by individuals who had additional ESL/ELD qualifications (Teaching English Language Learners, Ontario College of Teachers). Interview data also indicated that in smaller boards, individuals responsible for the initial assessment of ELLs do not necessarily hold additional qualifications. For example, one interviewee noted:

> "I don't have ESL qualifications but when we have a new student, at least I can do the initial STEP for them and for some of the students a PM Benchmark and show the teachers at about what reading level the student is at."

Another interviewee with responsibilities for ELL policy implementation in a small board noted:

> "I am really learning in this role. It is not my specialty."

Analysis of interview data demonstrated that most school boards used Steps to English Proficiency (STEP) for the initial assessment but vary in the way they conduct assessments. For example, one interviewee noted:

> "Our school board has a reception centre for secondary but not elementary. The feeling is that in elementary, we want to assess over a period of time because they are long assessments and they are young children. How much are you going to get in 3 hours when they first arrive? Whereas you can do little pieces over a few weeks you can get a much better picture of where they are at."

There were concerns expressed by interviewees regarding the provision of additional supports for students with limited prior schooling.

> "Where we're really struggling is with our ELD. Those students, as I said, we received all those newcomers and now 4-5 years later, they are not progressing the way they should be progressing."

Another interviewee expressed the following similar concerns for ELD students:

> "I've got flags around some of our students who need ELD programming and the trauma that they're bringing to schools and how we're actually

supporting them. I have had a lot of calls around that."

Concerns documented in board project reports echoed the expressions of concern for students requiring an ELD program that were documented in the interviews. For example, "programming for ELDs with limited prior schooling" was listed as a 'challenge/tension' in board project reports. In addition, 'next steps moving forward', articulated in a few of the board project reports made references to providing greater support for students with limited prior schooling. Examples included:

- "There is a need to expand focus to build teacher capacity to support students with limited prior schooling."
- "Interest in creating new pathway for older ELLs (18+) with limited prior schooling, including work/coop component."
- "Provide support to teachers working with students with limited prior schooling."

The People for Education reached a similar conclusion regarding the need for additional support for students with limited prior schooling in their 2017 Annual Report on Ontario's publicly funded schools. In the report it was noted that "Ontario's ELL policy states that in situations where students come from backgrounds with limited access to schooling, additional supports need to be provided. Despite this requirement, some principals commented that the needs of their students- beyond language acquisition - are not being met" (p. 28).

There were a number of references regarding the identification of ELLs who may have special education needs in all three sources of evidence (e.g., policies and protocols on school board websites, board project reports, and interview data). Based on an analysis of the 2019-2020 project reports, one board reported that as a result of their work, a special education protocol for English language learners was developed. The development of ELLs and special education protocols was also a theme that surfaced during interviews. An interviewee from one of the larger boards talked about the implementation of an ELL-Special Education protocol including the development of a 'Goals and Interventions' form that they recently put in place.

However, there were also concerns expressed about meeting the needs of ELL students with special education needs. One interviewee noted:

"I have concerns about ESL and Special Education and how we come together. Our plan definitely has steps to take. It definitely has guidelines but I am not sure our Student Services Department, if I am going to be honest, and School Programs are working together as well as they can to support these students and I'd like to see more of a continuum of care for students so we're all sitting at the same table at the same time and understanding and I want to see that at the board level."

Another interviewee noted:

"When I went to that first ERGO[2] meeting in October and we had to identify our main needs with that team there. Eighteen plus as well as ELL and Spec Ed protocols were the two

that everybody had their hand up around."

In regard to initial assessment of ELLs, it appears that STEP is the assessment tool most frequently used in school districts in Ontario. The initial assessment of ELLs is conducted by educators with and without additional qualifications (Teaching English Language Learners, Ontario College of Teachers), depending on the board's resources. It was frequently reported that additional supports for students with limited prior schooling are needed. Some concerns were expressed for ELL students with special education needs, however, larger and medium sized boards are beginning to put protocols into place to address the needs of ELLs who also have needs that require special education services.

Policy Component 2.4 Placement of English Language Learners

This component of the policy deals with placement decisions for ELLs and information in which placement decisions should be based upon. Placement of ELLs was a theme consistently noted mainly in the interview data. One interviewee stated:

> "We are really working on pathways and making sure students get placed properly and in the right programs. We are closely watching our grade 7 and 8 ELL students and creating profiles so that we minimize misplacements."

It seemed that school boards had an easier time adhering to the policy mandates regarding the placement of ELLs in elementary schools more so than in secondary schools. One interviewee noted

that in regard to ELLs in elementary schools:

> "It's pretty easy in elementary. Most students are placed age appropriately. Placement is more of an issue in secondary."

This aligns with the policy that states, "2.4.2a. In elementary schools, English language learners will be placed with an age-appropriate group" (p. 20). Secondary placement, however, seemed a bit more complicated. The policy mandates that decisions about program placements for ELLs in secondary schools should depend upon a number of interrelated factors which include the students' prior level of schooling, background, and aspirations. The policy also states that initial placement of ELLs in secondary should be "provisional, to give students opportunities to demonstrate their knowledge and skills" (p. 21). The granting of credits also makes this policy mandate (2.4 Placement of English language learners) more complicated in secondary schools than in elementary schools.

Examination of the artifacts collected for this study demonstrated that in secondary schools, the Prior Learning Assessment and Recognition (PLAR) process is often used to determine placement and credits granted for ELLs as evidenced in school board policies accessed from school board websites. Transcripts and artifacts from the student's home countries are sometimes used as well. In addition, some boards grant credits 'up-front' and others wait to determine what students can do and then grant credits. For example, an interviewee noted,

"What we do at our board is put them in courses and see how they do. If they get the grade 10 math, then the guidance counselor will grant the grade 9 math. But there is some confusion around this. It's not clearly outlined."

Concerns regarding placement in secondary schools for English language learners were also expressed by interviewees. For example, an interviewee noted the following:

"I don't like seeing a grade 12 in with grade 9s and that is happening a lot. When I go in, I get push-back. Like 'why are they taking grade 9 gym when they can take grade 12 gym?' So, it's been hard. I have to say. I have earned every gray hair trying to fight for these kids."

In this section of the policy (2.4 Placement of English Language Learners), it is also noted that "interaction with English-speaking peers supports English language learner's overall adjustment to the Ontario school system" (p. 21). There were a number of concerns however, over placements that limit opportunities for ELLs to interact with English-speaking peers expressed by interviewees. One interviewee noted:

"I have some concerns around placement. For example, a grade 9 student being placed in an applied level math class that is ESL designated. That is more of an accommodation for the teacher than it is for the student. The student can do the math; it's just the teacher doesn't know how to accommodate

them. Which also means they are isolated. It's this linguistic segregation that goes on. That's a problem when you have magnet schools with lots of ELL students."

Another interviewee expressed the following similar concerns:

"Segregated programs are really a problem. We have been really focusing on how we can move from these completely segregated classrooms to full inclusion. We have been working with it. It was challenging when we received all the newcomers. We welcomed over 100 Syrian newcomers and many of them had limited prior schooling. That wasn't a good time to start integrating full time so we had to wait."

There was evidence of ELL 'magnet schools' in other data sources examined in this study as well. When examining board web pages, using the search term "English language learners", it was discovered that in one medium sized board, *all* English language learners are placed at *one* high school. In another example, a school board with 16 high schools had designated 4 schools in which English language learners could attend. A review of school board websites revealed that it was not uncommon for boards to have magnet schools (also referred to as 'centres' for ELLs).

Regarding the placement for ELLs, it seems the policy is adhered to easily in elementary schools. The provisions and considerations for placement in secondary schools seems to result in differences in which school boards adhere to the policy guidelines. In

addition, many boards have designated magnet schools where they place English language learners.

Policy Component 2.5 Programming for English Language Learners

This policy component includes the implementation of "programs and services that will enable English language learners to continue their education while learning English" (*ELL Policies and Procedures*, 2007, p. 22). The availability of ESL and ELD programs varied, depending on the decisions made by boards, often resulting from available (or lack of available) resources. Large districts provided examples in which they are expanding programs. For example, an interviewee noted:

"We are expanding secondary programming for ESL C, D, and E into all of our schools."

An interviewee from a medium sized district noted:

"In secondary, each school is running at least one section of monitoring and one section of ESL every year and most are running more than that."

Another interviewee from a medium sized district noted:

"All of our high schools except for 1 have some kind of an ESL program. They either have a full program like at a centre school or they have what we call a resource support so lead teachers have anywhere from 2 to 8 sections"

Smaller and medium sized boards often noted they lacked enough resources for ESL/ELD programs. This was found in board project reports. For example, one report noted:

"Three itinerant ESL teachers to support approximately 50 schools is not enough to meet ESL/ELD students' needs."

Lack of resources was also a theme gleaned from the interview data, as one interviewee expressed:

"A problem is you have 3 students who need an ELD program and they are in an English class but the school is not delivering the two different curriculums. There aren't enough students to actually deliver those programs. Or they are delivered once a year. For example, you have an ESL class that you can attend in September but then it's not offered again until the next September."

One interviewee also commented on settlement workers noting:

"It's important to not only support the student, but it's a whole family thing. We have our settlement workers but we just don't have enough of them. We find that they are spread thin. Right now, we have 5 for our school board and we have over 2000 students so that is hard."

An interviewee from a smaller board noted:

"It's difficult to work in a vacuum - which is often what happens with ESL teachers and ESL staff just by nature

of the numbers and the nature of the representation I guess."

This section of the policy (2.5 Programming for English Language Learners) also addresses program adaptations for English language learners. It is noted that:

"Appropriate adaptations include:

- Modified expectations (e.g., modification of some or all of the course expectations, especially for students in the early stages of learning English or those who required ELD support). (Note: When learning expectations are modified, this must be clearly indicated on the student's report card.);
- a variety of accommodations related to instructional strategies (e.g., extensive use of visual cues, graphic organizers, peer tutoring, strategic use of students' first languages)" (*ELL Policies and Procedures*, 2007, p. 23).

There were a number of references to modifying curriculum expectations for ELLs in the board project reports. References appeared under three categories including key learnings, challenges, and next steps (Table 4).

Table 4. References to Modifying Curriculum Expectations for ELLs in Board Project Reports.

Heading	Reference
Key Learnings	"Teacher's observations of students' gains influenced their interest in making more modifications." "The most growth was made in relation to modifying curriculum expectations."
Challenges/Tensions	"Our biggest challenge was understanding how to modify and accommodate expectations." "Teachers are a bit resistant when it comes to modifying expectations."
Next Steps	"We need to better understand how to modify expectations." "We need more work in modifications." "Help teachers understand why it's important to modify."

The challenges to help teachers understand the need for modifications for ELLs also surfaced during the interviews. For example, one interviewee noted:

> "Explaining to high school teachers the difference between modifications and accommodations and what is okay - that has been mind-blowing. There is still a fair bit of push-back there. It goes against - you know, sometimes a teacher will say 'No, they need to be able to do this to get the credit' and to sort of say, 'Well, actually no' that's not what it is'. But at least now I know where to go to say 'this is where it says it and here it is in Growing Success and here it is in these documents' that has been helpful."

This section of the policy (2.4 Placement of English Language Learners) also indicates that boards will designate qualified personnel to coordinate programs and system level leadership. Some boards reported that they were able to increase the number of designated, qualified personnel responsible for ensuring the needs of ELLs are met. One example included the response below from an interviewee at a large school board:

> "We have a large dedicated team of staff assigned to support the needs of ELLs. This includes a system principal, three learning coordinators, two secondary assessors, 82 elementary FTE school-based support, and 33.5 secondary FTE for lines and school-based support for secondary ELLs, including lines for department heads and ELL lead teachers."

An interviewee from a medium sized district noted:

> "We did get an increase in staffing. Finally! We were at 29 and now we're at 43 so that happened - so there is hope. We need 50 but we'll take it!"

An interviewee at a medium sized board also shared that they have ESL coaches in place to support classroom teachers:

> "To support the homeroom teachers, we hired ESL coaches. We have ESL teachers who work with the ELL students in classrooms but we also have ESL coaches who are working with teachers to build capacity. This is the third year with the ESL coaches and it's really changed. Many of our classroom teachers now are realizing this is where our kids belong - in the homeroom and they're learning strategies on how to support the ELLs in the classroom. Our next step is to move ESL teachers into classrooms - teachers kind of moving those kids into the classroom. That is our vision and that's where we want to head to next."

Many districts have ESL itinerant teachers. Others have 'lead teachers' in schools to support ELLs. An interviewee from a medium sized school district noted:

> "We just got just over 1000 elementary ELLs students across the board. In high school about 700 to 800 ELLs. In elementary there is an ESL teacher responsible for each of the schools. Having said that, some teachers are responsible for 4 to 5 schools. But what I am trying to say is

there is a need and a contact for ESL support at each of the schools. In secondary it's the same.

Another interviewee from a medium sized district noted:

> "ESL Lead teachers for the most part have really stepped up to take on school-based leadership roles."

While school districts have designated personnel, in some cases, those designated to support ELLs do not have additional qualifications (Teaching English Language Learners, Ontario College of Teachers). An interviewee from a small district noted:

> "When we realized the ELL portfolio didn't belong under Spec Ed - which is where we had it, I inherited it. As a K-12 Special Assignment teacher, I supported literacy, math and whatever else was needed. Our curriculum team downsized and now it's just me. I am working on this portfolio but it really is not my strength."

Additional concerns expressed about qualified personnel to coordinate programs and system level leadership for ELLs had to do with 'turn-over'. One interviewee noted:

> "We've seen a high turn-over, every 3 years or so and that is a challenge because our job as an ESL consultant isn't just about the instructional end - with most consultants, it's about instruction. With us, it's a lot about policy and informing system-level work so it's not something that you can do in 2 years or 3 years. It's different. Yes, there is instructional stuff but there is a lot more advocacy,

working with the community members, the equity piece. It's the kind of work that needs sustainability."

Another interviewee noted:

> "The Principal of School Programs changes the game. We're always talking top-down, right? In the past I had a Vice-Principal of School Programs who was really, really very supportive and that position got cut. This year I am on the back burner again and it's constantly up to me to bring it forward, bring it forward, bring it forward - which is okay, I can do that but it's nicer when you have someone who understands it already."

The development of programs that benefit ELLs has been the focus in many schools. Some school boards are able to expand their programming and designate additional personnel to support ELLs. Others are reducing staff and or allocating the ESL/ELD portfolio to consultants who have responsibilities for multiple portfolios (e.g., French as a Second Language, etc.). Boards with larger ELL populations have schools with one or more full-time English as a Second Language (ESL) teacher(s), whereas school boards with smaller ELL populations have itinerant ESL teachers who provide support to more than one school. The modification of curriculum expectations was noted as an area of growth in some cases, but more frequently it was noted as an area of need. Finally, the importance of having a system-level administrator who understands the *ELL Policies and Procedures* (2007) was noted along with the importance of having less

'turn-over' of board leads who advocate for policy implementation.

Policy Component 2.6 Graduation Requirements for English Language Learners and Policy Component 2.7 Substitutions for Compulsory Credits

These policy components include information about compulsory credits and substitutions for compulsory credits in secondary schools. In reviewing the data collected for this study, there was no evidence pertaining to either of these policy components. The requirements that are outlined in these two sections of the policy clearly identify what courses are needed in order for an ESL/ELD student to graduate. For example, "A student entering the Ontario secondary school system at any grade level may count a maximum of 3 ESL or ELD credits as compulsory English credits" (p. 24). Another example, "The Ontario Secondary School Literacy Course (OSSLC) is a full-credit course that fulfills the Literacy requirement for graduation and can be counted as the compulsory English credit in either Grade 11 or Grade 12" (p. 25). It is suspected that the lack of evidence related to these two policy components in the data collected for this study was due to the clarity and prescriptive nature of the mandates articulated in this section of the policy. In other words, these mandates are in place in school boards across Ontario because they are specific and leave no room for interpretation. Other supporting documents such as 'What Do You Need to Graduate from High School?' have also helped provide clarity and adherence to this component of the *ELL Policies and Procedures* (2007).

Policy Component 2.8 Ongoing Assessment, Evaluation, and Reporting

This policy component mandates that school boards will "establish procedures for ensuring ongoing assessment of the development of proficiency in English and the academic progress of each English language learner" (*ELL Policies and Procedures*, 2007, p. 27). In the policy it is recommended that schools continue to track the progress of ELLs to ensure that supports are provided when necessary.

Even though STEP was not yet developed when the policy was created, there were multiple references to STEP as a helpful tool in the ongoing assessment and tracking of ELLs in board project reports and in the interviews. Board project reports make references to STEP as "foundational" and it was frequently noted that STEP helped to support teachers' understanding of "broader aspects of ELL needs." It was also frequently noted that "students make greater progress when teachers are comfortable with STEP." There were a few inquiries into Kindergarten Steps to English Proficiency (K-STEP) and an expressed need for the tool in kindergarten classrooms. For example, one board indicated the following:

> "We have noticed that we have a large population - many of our kindergarten classes are heavy with English language learners so we would really love to see the continuation of the pilot of K-STEP. We think that would really benefit our teachers who really want to support their kids the best way they can and

they are screaming for help. We definitely have a need there."

Interviewees expressed gratitude to having the STEP framework to refer to in their roles and saw STEP as instrumental in laying the groundwork for improvements in supporting ELLs. A district team noted:

"We have seen a greater awareness of STEP. We've had STEP running in elementary for a few years but secondary is really taking STEP on and we're implementing a new tracker for secondary right now. We are really finding that having that common 'look for' to inform programming, instruction, and student goal setting out of STEP data is really helping us with our new ELL tracker that we have and also our credit accumulation reports. We have a lot of focus from psych services now around our ELD who are stalling in their progression."

Larger and medium sized boards have internally developed trackers that are housed within their student management systems. For example, one interviewee from a medium sized board noted:

"We track and monitor students on STEP. We developed three years ago an ELL management system where we can track and monitor all the ELLs in elementary. We are in the process of getting secondary on there too. The coaches update it every term. We can see if they are progressing on STEP and we can see if they are progressing in their classrooms. And the coaches are really good at monitoring that and so are the ESL teachers. In the last three years,

we've really been promoting STEP in elementary and also the teachers are becoming more familiar with it too."

Another interview team from a larger board indicated that they too have developed an internal system for ongoing assessment and progress monitoring.

"We developed an app - a tracker internally and it's pretty amazing. The tracking of the data, the development of support plans, most importantly, all the checks and balances in there to ensure that no student falls through the cracks - is pretty amazing. It's about accountability to our English language learners in the board."

Also outlined in this section of the policy is information that pertains to documenting, reporting, and explaining the modifications of curriculum expectations for ELLs, use of interpreters, and annual inclusion of ELL's level of English language acquisition in the Ontario Student Record (OSR). Data revealed that boards have different methods for documenting and explaining modifications and updating OSRs. As one interviewee noted:

"Most boards have systems for the housing of STEP information. This has been an ongoing problem in Ontario. The problem is that because we have so many data collection systems, it creates chaos. Big boards have more money to spend where they can put an electronic system into place. Other boards are maybe using google docs and that isn't all that reliable when someone renames a google doc with the wrong name. The files get lost - you lose the kid. This is one of the

challenges we face since STEP came out. We don't have the technology in place.

There are also different methods used in boards for documenting modifications for ELLs:

> "At our board with our report cards when we check the ESL box, we're required to have a copy of their record of modifications included into that. Usually we do ours as a google document. It's a live document so we can add to it as we work through the units or it could be separate google docs for different units but we try to put that together so that there is some understanding of the modifications that have been made."

Another board team indicated the following in regard to documenting modifications to curriculum expectations:

> "Our board was one of the last to come to the table with documented modifications. Now we are this year, starting for the first time, to request that teachers complete support plans that document the modifications to their curriculum expectations and hopefully, if we're documenting those, we're really identifying what students are stalled in their STEP."

A different team member continued to explain:

> "And with those modifications too, we have some data that shows the extraordinary number of kids - ELLs that have received modifications so now another 'check' is that principals have to sign in order to prove

modifications to programming. There are also checks in place where if a student is at a STEP 3 or 4, then their program can't be modified based on their language acquisition needs. So, all these 'checks' will change teacher practice because they have to - there is no other way around it now."

In regard to updating OSRs, an interviewee noted:

> "In elementary we try to have them update - we have an internal way of documenting where kids are at in the STEP so we actually update at the end of each semester STEP but I think that is falling apart at our board at secondary."

And finally, there are different ways in which schools engage English language learner's parents. As noted by one interviewee:

> "We've had some schools who have done some great work. They go to more of a student portfolio and they have the parents come in and their child explains to them and shows them their work. They have interpreters there as well. And the teacher is there as well. And there is success criteria so the student can explain why they got this mark and what it means."

It was also noted that there may be a need in some schools to improve the way in which they reporting to parents of ELLs:

> "Reporting to parents. I am not sure how well we do with that. I think we used to do a better job, in our board, when we had more support from settlement workers. They used to run

clinics for parents about how to read the report card and what it means."

STEP was identified as a foundational tool for supporting the ongoing assessment, evaluation, and reporting for ELLs. Boards have developed internal ways to track ELL STEPs - some of which are more sophisticated than others. Updates to students' OSRs are usually made two-three times per year and by different individuals (e.g., lead teachers, ESL coaches, etc.), depending on the board's resources. In addition, boards have developed their own methods for documenting and reporting curriculum modifications.

Policy Component 2.9 Identification and Involvement of English Language Learners in Large-Scale Assessments

This policy component includes expectations for ELL's participation in "Grade 3 and 6 provincial assessments in reading, writing, and mathematics, and in the Grade 9 provincial assessment in mathematics, when they have acquired the level of proficiency in English required for success" (*ELL Policies and Procedures*, 2007, p. 28). It is also stated that ELLs should participate in the Ontario Secondary School Literacy Test as well as international assessments "when they have acquired the level of proficiency in English required for success" (p. 29). Interview data noted that there was a need for greater clarity and a need to build common understanding in regard to determining "level of proficiency in English required for success". One interviewee noted that the ESL/ELD Resource Group in Ontario (ERGO)

released recommendations for decision makers in regard to inclusion of ELLs on provincial assessments in an effort to increase consistency across boards. However, it was noted that:

"This varies even within boards - between schools. We have 'magnet' schools and we had a 'magnet council' - that was one of the issues we looked at - to make sure that all of our ESL high schools have the sort of same understandings around that."

When the researcher examined results from the Education Quality and Accountability Office (EQAO) grades 3 and grades 6 and the Ontario Secondary School Literacy Test (OSSLT) in an effort to further inform this study, it was not possible to draw any conclusions about the progress of English language learners in Ontario from large-scale provincial assessments. There were many inconsistencies in how ELLs were identified and deferred from assessments. There were few or no reported cases of ELLs in some schools, including schools where ELLs were known to exist. There were also many schools and boards whose data was not shared by the Ministry of Education because of requirements imposed by data suppression rules (i.e., data are not shared when there are fewer than 10 data points).

Policy Component 2.10 Discontinuation of ESL/ELD Support

This section of the policy mandates that ELLs "should receive ESL/ELD program support until they have acquired the level of proficiency required to learn effectively in English with no ESL/ELD support" (*ELL*

Policies and Procedures, 2007, p. 29). Boards are in different places in regard to when, who, and how they determine to stop support. Some boards have clearly defined cut off points for discontinuation of services (e.g., STEP 4 or 5). Others do not. A review of school board policies and administrative procedures demonstrated that discontinuation of ESL/ELD services are addressed in many school board policies (although not all). However, the language is vague. For example, on more than one occasion board policies read:

"Discontinuation of ESL/ELD Support

a) English language learners should receive ESL/ELD program support until they have acquired a level of proficiency required to learn effectively in English with no ESL/ELD support.

b) The decision to discontinue ESL/ELD support is made by the principal in consultation with appropriate staff.

c) In [removed name] District School Board, support for English language learners is allocated on an annual basis. In September, the appropriate superintendent will notify administrators of this process."

Note that the decision to discontinue support in the above school policy is made by the "principal in consultation with appropriate staff". Some board policies included parents/guardians and students in this decision as well (which adheres to the provincial policy mandate):

"Students who are English Language Learners should receive ESL/ELD

program support until they have the level of English required to learn effectively in English with no ESL/ELD support.

The decision to discontinue ESL/ELD support is made by the principal, in consultation with the student, parents/guardians, and ESL/ELD and classroom teachers" (*ELL Policies and Procedures,* 2017, p. 29).

However, even though board policies might stipulate the involvement of parents and students in the decision to discontinue support, this might not necessarily be what happens in actual practice. One interviewee noted:

"In our board it is sort of a decision - well it's supposed to be a decision between the teacher, the parent, and the student but it really just ends up...it causes conflict when you send a letter home. We used to send a letter home to let the parents know they've been discontinued and the parents would get really upset."

As noted above, there are inconsistencies in how discontinuation of ESL/ELD support is interpreted and enacted in school districts throughout Ontario.

Policy Component 2.11 Appropriate Allocation of Resources to Support English Language Learners

This section of the policy mandates that ELLs "funding provided under the ESL/ELD component of the Language Grant is expected to be used for programs and services that are designed to benefit English language learners. Information

about the use of ESL/ELD funding will be included in the financial statements submitted annually to the ministry" (*ELL Policies and Procedures*, 2007, p. 29). During this study, information was not obtained regarding school board's spending of the Learning Opportunities Grant (LOG) or the Language Grant.

Visa students are mentioned in this section of the policy. Concerns were expressed during interviews that English language learners are getting less attention than international students and that funding for ELLs may be going to international students. There were also several statements expressing concerns that international students were not receiving the level of support they needed to be successful. When scanning board's websites, many have very elaborate pages designed to recruit international students. In some cases, there was more information available regarding support and programming for international students than there was information regarding support and programming for local ELLs.

Policy Component 2.12 English as a Second Language Teacher Qualifications and Professional Development

This section of the policy mandates that "school boards will assign staff with the qualifications required by the Ministry of Education to teach ESL and ELD programs" (*ELL Policies and Procedures*, 2007, p. 31), according to the Ontario Regulation 184/97. Also indicated in this section of the policy is the provision of professional development by school boards for educators to support the implementation of the policy. Interviewees consistently noted that the

provision of professional development was needed for all staff and they felt they were able to just 'scratch the surface'. For example, one interviewee noted:

> "When we're out there in the system, teachers are still screaming for PD. All of a sudden, they have an influx of English language learners and they are not sure what it all means and they are in a panic and that is good because they are reaching out."

There were a variety of professional learning designs utilized in school boards and schools across Ontario. Some of these designs included book studies, monthly meetings, cycles of collaborative inquiry, and coaching and networking. Also, some boards indicated they had produced online modules where teachers could access materials and engage in self-paced, professional learning. Collaborative inquiry was identified as a powerful way to engage in professional learning. It was noted that collaborative inquiry helped to surface and address educators' biases and assumptions about ELLs and often resulted in a shift in teachers' expectations and 'mindsets'.

It was noted that many of the professional learning opportunities were a result of funding provided through CODE applications for board projects. One interviewee noted:

> "The projects are very, very helpful because it fills some of the needs that teachers request. For example, when we work on the projects, we've always focused on the basics of STEP. So, we're bringing STEP to math teachers, science teaches,

English teachers, and guidance counselors, and so on. And what really helps with that, it fills the need that there is staff who are requesting this. They want to know what is STEP. It helps us ensure that it's not just one person in the building taking care of ELLs - it's people who want to do this who might not have the background - so we bring them together and share this is what a STEP 4 means. Now it's not just that one ESL teacher who is responsible. It's a vested interest from all."

In examining the themes identified from board project reports in relation to professional development, there were many references to increased collaboration among mainstream teachers and ESL/ELD teachers and as a result, homeroom and content-area teachers were assuming greater responsibility for the success of ELLs. Other themes included valuing an asset-based approach to supporting ELLs, welcoming community and family involvement, and the need to address trauma and students' social-emotional needs. Furthermore, board projects were positively impacted when administrators were involved. Lack of availability of occasional teachers for release coverage was a frequently identified barrier to teachers' participation in professional learning. In addition, timing (late fall) of board project applications was also identified as problematic.

The power of networking was also a theme that surfaced in both the interviews and in the examination of board project reports. In some cases, references were made to networking amongst departments within

boards, across schools within boards, and across districts and schools within the province. One interviewee noted:

"Some of the best learning we did happened through those networks with the board project work. When I was able to see what was happening at other boards and in other schools, it was really helpful."

Another interviewee noted:

"Over the past three years there has been a lot of momentum gained in bringing the entire board together to realize it's not just your student, they are our students, and what are you going to do to support them? We are seeing a lot of inter-departmental connections at the board level. We still have work to do there. We still have to be an advocate to be seen and heard but people are becoming more receptive and recognizing the need."

Board reports also reflected that educators valued networking opportunities:

"Seeing what other schools are doing and how they have been able to impact the staff, admin and students. I thought it was very beneficial to also get feedback on what we are doing at our own schools."

Finally, many interviewees noted the importance of professional learning and the need to extend more opportunities for professional learning to school administrators in relation to the successful implementation of the policy. As one interviewee noted:

"We have been getting exposure with the families of schools and gaining access to Principals that way. We're hoping to build on that, because it was a great start and we want to keep it going, because that is key, right? In having the administrators understand everything."

When it comes to professional learning aimed to increase teachers' capacity to improve outcomes for ELLs, there were a variety of ways educators engaged in professional learning. There was an expressed need for opportunities for system and school leaders, homeroom and content-area teachers, and ESL/ELD teachers to continue engaging in professional learning. There was an expressed appreciation for previous funding opportunities for board project work and a hope that opportunities will continue.

Discussion

The findings from this study are discussed in the section that follows. This discussion is in relation to the nine critical aspects that affect policy implementation identified by Fullan (2015). Following the discussion, a conclusion and limitations of the study are presented.

Need. As noted earlier, Fullan (2015) pointed out that there must be a clear fit between the policy and the identified and prioritized local needs. This critical factor affected the implementation of many of the components in the *ELL Policies and Procedures* (2007). Regarding the establishment of protocols for the reception and orientation of ELLs, it was demonstrated that in larger, urban school districts, where there was an immediate need, this component of the policy was enacted quickly and thoughtfully. School districts where the need for protocols for welcoming English language learners and their families into schools and communities

was not as great, often operated on a case-by-case basis and lacked clear cut procedures. Thus, smaller, rural districts have not enacted this component of the policy because there is a lesser perceived immediate *need*.

The implementation of other components of the *ELL Policies and Procedures* (2007) that were affected by *need* included initial assessment, programming, and the designation of appropriately qualified personnel to coordinate programs. All school boards in Ontario have someone who is responsible for supporting ELLs but some may still not have someone who is specifically responsible for the initial assessment of English language learners. Where other differences among boards occurred is in the *level of qualifications* and the *number of individuals* responsible for initial assessments of ELLs. Where there is a greater *need*, there are greater numbers of qualified individuals responsible for ELL's

initial assessment. In addition, in boards where the *need* is greater, there were heightened concerns related to providing additional support for students with limited prior schooling and heightened awareness of the importance of identifying students who require special education services. Even though there were concerns expressed, there was evidence to suggest that these two areas of the policy (addressing the needs of ELD and the provision of Special Education services) require additional attention in order to achieve consistent and wide-spread implementation.

The recognized *need* for additional resources to support the implementation of the *ELL Policies and Procedures* (2007) in school boards was evidenced by the large number of applications received yearly by CODE for funding for board projects. The evidence also showed that funding for board projects helped districts to address their unique *needs* for supporting ELLs. In smaller districts, the need is often initial assessment and the introduction of STEPs. In larger districts, needs vary, and projects are focused on building awareness about the support ELLs need in order to succeed and strengthening educators' capacity for meeting those needs.

Clarity. Specific aspects of the *ELL Policies and Procedures* (2007) that were clearly articulated and left no room for interpretation included graduation requirements and the substitution for compulsory courses. These components have been implemented consistently in all school boards across Ontario. As noted earlier, however, when a policy is not clear, it can lead to significant implementation

problems (Fullan, 2015). The findings from this study suggest that there is a perception, on the part of policy implementers, that some of the components of the *ELL Policies and Procedures* (2007) lack clarity. These included issues regarding the identification and involvement of ELLs in large-scale assessments and the discontinuation of ESL/ELD support. Specifically, the policy reads that ELLs should participate in large-scale assessments "when they have acquired the level of proficiency in English required for success" (p. 28, p. 29). This language was interpreted as "ambiguous" by some participants and there was not a clearly agreed upon criteria for determining participation of ELLs in large-scale assessments amongst participants in this study. In addition, the policy reads that ELLs should receive ESL/ELD program support until they have "acquired the level of English proficiency required to learn effectively in English with no ESL/ELD support" (p. 29). This too was interpreted differently in various boards and therefore, these components of the policy have been implemented inconsistently in schools across Ontario.

The lack of specific strategies for achieving goals was also an issue of *clarity* that impeded implementation of components in the *ELL Policies and Procedures* (2007). Besides directing teachers to use the "appropriate box on the report card" (p. 27) to indicate when modifications to the curriculum expectations had been made, the perception that the policy lacked specific strategies for documenting modifications was revealed through the evidence in this study. Therefore, the documentation of modifications for ELLs

had not been consistently implemented in schools. Furthermore, it was noted that the policy lacked specific strategies for modifying and accommodating curriculum expectations and that there was a need to help teachers understand *how to* modify appropriately for ELLs. Even though other curriculum policy documents contain sections in the front matter that addresses 'Program Planning Considerations for ELLs' and Growing Success (2010) outlines the policy for documenting modifications and reporting, there still seemed to be a lack of clarity on how to do this.

Complexity. As noted in the literature review, Fullan (2015) described complexity as the "difficulty and extent of change required of individuals responsible for implementation" (p. 92) and identified three factors related to complexity when implementing education policies that included: (a) the difficulty; (b) the skills required; and (c) the alteration of beliefs. Evidence revealed that some teachers might perceive it too difficult and feel that they lack the skills required to meet the needs of ELLs. As noted by one ESL/ELD interviewee:

> "We need to recognize that no matter how valid and sound our plans and programming goals are, that we are working with individuals who are just as diverse in their needs and learning skills as our students. The educational environment in classrooms is not uniform and some colleagues are overwhelmed."

Along the same lines, Webster and Valeo (2011) conducted a study to determine how prepared teaching graduates felt in their ability to teach ELLs in Ontario and noted

"a strong disconnect between teacher education programs and the feelings of self-efficacy that graduating teachers express with respect to meeting the needs of ELLs in today's classrooms" (p. 123). The researchers concluded that "The general approach to course work in an Ontario faculty of education had failed to provide them with the skills that they needed to feel confident when working with ELL students" (p. 123).

Even though in 2015, the Ontario College of Teachers developed a series of changes to the initial education programs and mandated a series of topics, including supporting ELLs, there are differences among programs at the Universities across Ontario. Gagne and Bale's (2020) research demonstrates that there are huge inconsistencies between the Faculties of Education when it comes to preparing preservice teachers in terms of both time and content.

This lack of teacher efficacy could potentially explain the lack of opportunities, revealed in this study, for ELLs to be integrated into mainstream classrooms in some schools. There was also evidence, however, that increases in teacher efficacy occurred through participation in board projects. The potential influence of teachers' sense of efficacy on policy implementation is further expanded upon in the section below that addresses 'the role of teachers.'

Evidence also revealed that there was a need to shift some teachers' beliefs regarding low expectations (which seemed to also impact placement of ELLs in secondary schools) and issues of fairness and protecting the integrity of the credit

(which seemed to impact accommodations and curriculum modifications - especially in secondary schools). As noted in one school board report from 2015-2016:

> "Schools and teachers working with the students who are learning English as an additional language need support in shifting their mindset. They need to recognize what they don't know when it comes to working with students of diverse backgrounds."

The importance of an asset-based approach to supporting ELLs was another theme gleaned in the data. It was frequently noted that engagement in board projects helped to shift educators' "deficit-based view of ELLs to asset-based view" (Board Project Report, 2017-2018). Also, it was noted by one interviewee that:

> "The label ELL itself leads to deficit thinking about these learners. Boards are trying to shift their language to more asset-based terminology such as multilingual language learner (MLL) and English as an Additional Language (EAL) because it acknowledges that students have a language already and are just adding English."

In regard to complexity, there was some evidence that revealed ESL/ELD coordinators' and Lead Teachers' perceptions of the difficulty and extent of changes that are required to improve outcomes for ELLs. As noted earlier, one ESL/ELD interviewee noted:

> "I have earned every gray hair trying to fight for these kids."

ESL/ELS coordinators often acknowledged the complexity and difficulty involved in their job. It was also apparent however, that their beliefs closely aligned with the components of the *ELL Policies and Procedures* (2007) and the goal of implementation seemed to increase their motivation to advocate for ELLs and lead the work in their districts. There was no evidence gathered during this study in regard to school leaders' perceptions of the difficulty involved in enacting the *ELL Policies and Procedures* (2007). School leaders are key players in policy enactment and although it was beyond the scope of this study, it would be important to determine their perceptions of the skills required to support implementation of the policy. It would also be important to determine the degree in which their beliefs align with the policy mandates.

Quality and Practicality of the Program. Fullan (2015) noted the importance of whole-system capacity building that included a focus on collaboration, pedagogy, and system-ness in order to create specificity of action and commitment. Even though those who held system level positions of responsibility for the implementation of the policy (e.g., ESL/ELD coordinators) perceived their job as difficult in relation to being the recipient of "resistance" and "push-back", as noted earlier, they remained strong advocates for ELLs in school systems. The *ELL Policies and Procedures* (2007) articulates that *all* teachers, not just those designated as English as a Second Language (ESL) teachers, are "responsible for supporting academic success for all students - including English language learners" (p. 31). The evidence revealed that participation in

board projects created opportunities for meaningful collaboration (especially amongst mainstream teachers and ESL/ELD teachers), helped to focus improvement efforts on effective pedagogy, and thus helped to build greater capacity. Evident in many board project reports was the idea that "ESL/ELD no longer 'go it alone', but the responsibilities to meet the wide range of needs of ELLs is communal" (Board Project Report, 2017-2018). This supports Stille et al.'s (2015) finding that STEP (which was the main area of focus for board projects) supported professional learning by increasing "the extent of meaningful collaboration and communication among teachers working with ELLs, particularly between ESL and mainstream or subject-area teachers" (p. 14). The issue however, is that capacity built through educators' participation in school board projects represents very small pockets of the teaching population. There was no evidence that participation in board projects had an impact at the system-level thus, when considering the implementation of various components in the *ELL Policies and Procedures* (2007), spread remains thin.

The District. Fullan (2015) noted that successful implementation also depended on the strategies and supports offered at the district level. As noted earlier, those who hold district-level responsibilities for the implementation of the *ELL Policies and Procedures* (2007) acted as strong advocates and did their best to ensure that the voices of ELLs were represented at various 'tables'. However, the challenge of "removing often unintentional systemic barriers that often cause embedded biases toward ELLs" (Board Project Report 2017-

2018) was often noted. Reflected in the data was the need for greater coordinated efforts at the district level. There were a few examples in which various departments were working interdependently in school boards in order to better support ELLs and a few examples where ELL steering committees were being formed. However, for the most part, there was an expressed need for an increased sense of urgency and joint-ownership for addressing the needs of English language learners amongst district level leaders and/or amongst various departments operating in school districts. The evidence also revealed that there is a perception that the allocation of resources needed to ensure the success of ELLs was insufficient and/or misdirected (in many cases to international students) in some boards.

The most revealing evidence in regard to the district's role in supporting successful implementation of the *ELL Policies and Procedures* (2007) however, was evident in board improvement plans. As noted in the findings of this study, the inclusion of a section that addresses the needs of ELLs, as mandated by the policy, is practically non-existent in most board improvement plans in Ontario. The conclusion that can be drawn, based on this finding, is that boards have not adhered to this component of the policy mandate (or if they once did, boards are no longer adhering to this component of the policy mandate). School improvement plans reflect the identified needs and areas of focus articulated in board improvement plans. Although school improvement plans were not a source of data drawn upon during this study, it is likely that ELLs are not appropriately

represented in *school* improvement plans either.

Community Characteristics and Board Characteristics. This aspect, that Fullan (2015) identified as one of the critical characteristics affecting successful policy implementation, included how changing demographics increases pressure on school districts to make quick adoption decisions. The influence that changing demographics has on policy uptake was evident in some of the evidence examined during this study. For example, the comments from an interviewee at a medium sized school district (shared earlier) demonstrates how community characteristics affected policy implementation within one school board:

> "We have been really focusing on how we can move from these completely segregated classrooms to full inclusion. We have been working with it. It was challenging when we received all the newcomers. We welcomed over 100 Syrian newcomers and many of them had limited prior schooling. That wasn't a good time to start integrating full time so we had to wait."

In addition, it was noted that there has been limited involvement with the ELL community in regard to policy implementation.

> "We haven't had community involvement where families share their stories, like in the case of the Indigenous policy roll out, with ESL. There has been limited access and involvement with the ELL community."

Fullan (2015) also noted the role that school board trustees can play in affecting implementation but evidence regarding school board trustees was not collected during this study.

The Principal. In cases where school principals were diligent in carrying out their responsibilities for the enactment of *ELL Policies and Procedures* (2007), implementation was more successful. One theme that was gleaned from the board project reports was that the team's collaboration and professional learning were positively impacted by the administrator's involvement. It was frequently noted that when the principals' participated in the project work, everyone benefited. This theme was captured well in the following quotation from a 2017-2018 board project report:

> "We realized that it's so important that teachers and administrators engage in collaborative experiences. A whole school approach to teaching newcomer students is essential to accelerate students' learning. When a number of staff, in a school building have the same focus, understanding and empathy towards learning, student success is achievable."

The importance of the principal's involvement was also captured frequently in the interview data. In a study of program implementation in Ontario schools, Segedin (2018) also concluded that when school leaders were involved in programs it helped to improve implementation. Evans (2009) noted that as "mediators of the policy context, school leaders must act with the intention of shaping schools' shared understandings and shaping

implementation of policy mandates" (p. 82). Evans (2009) also pointed out the role of school leaders in influencing teachers' sense of efficacy toward productive responses to policy implementation.

The need to increase school administrators' knowledge of the policy components and to building their capacity to further support the enactment of these components was also evident in this study. It was frequently mentioned that "air time" during system principals' meeting was being sought by ESL/ELD coordinators and that when they were able to work with administrators, it was advantageous to all as noted in one board project report from the 2017-2018 school year:

> "Our work this year allows us to share our findings with administration and engage them in being at our CI table so that a common message can be shared throughout the school that language acquisition for students who are ELL are the responsibility of all."

This reflects findings from Robinson, Hohepa, and Lloyd's (2009) meta-analysis that examined school leadership and student outcomes. Robinson et al. (2009) identified five leadership practices (and their effect sizes) that impacted student outcomes and concluded that when principals engaged in professional learning alongside their teachers, it had the highest effect on student achievement.

The Role of Teachers. Fullan (2015) noted that individual and collective teacher factors played a large role in determining quality implementation. Teachers were not direct sources of data for this study however, evidence contained within the board project reports and interviewee transcripts demonstrated that teacher factors did indeed affect the implementation of the *ELL Policies and Procedures* (2007). As noted earlier, a weakened sense of efficacy can affect policy implementation (Fullan, 2015). Teacher efficacy refers to teacher's judgements about their ability to positively impact student outcomes. Collective teacher efficacy refers to "the perceptions of teachers in a school that the faculty as a whole can execute the courses of action necessary to have positive effects on students" (Goddard, 2001, p. 467).

It seemed that in some cases, teachers' sense of individual and collective efficacy to make a positive educational impact on ELLs was improving (although it was frequently acknowledged that more work needed to be done in this respect). Increases in teacher efficacy were often attributed to teachers' participation in board projects. The two main sources that influence a teachers' beliefs about what they are able to accomplish include first-hand experiences with success (and whether that success was interpreted through a fixed or growth mind-set) and seeing someone else succeed (along with the expectation that they too can acquire the skill) (Bandura, 1977). Participation in board projects may have contributed to an increase in teacher efficacy as the projects provided opportunities for teachers to engage in joint problem-solving and opportunities for teachers to vicariously experience the success attained by others. As noted in a 2017-2018 board project report:

"The biggest learning was seeing what other schools are doing and how they have been able to impact the staff, admin and students. I thought it was very beneficial to also get feedback on what we are doing at our own schools."

In secondary schools, the data showed greater resistance on the part of teachers in regard to adhering to the policy mandates. The following quotation from one interviewee captures this theme nicely:

"I think the elementary has a beautiful way of including our kids but the secondary's really struggling. Our mainstream teachers are really pushing back. They want them to go into locally developed, they want specific courses for ELD, all throughout - not just math - they want science, they want geography, all of it."

Although teacher efficacy was not directly measured as part of this study, there was some evidence that demonstrated that a lack of efficacy might be the reason for this resistance. Hoy, Sweetland, and Smith (2002) noted that "strong collective efficacy leads teachers to be more persistent in their teaching efforts, set high and reasonable goals, and overcome temporary setbacks and failures" (p. 90). A weakened sense of efficacy, on the other hand, causes teachers to give up more easily and reduce their goals and efforts. Although it can't be stated conclusively, multiple factors influencing teachers' sense of efficacy may have in turn, influenced the fidelity of implementation. Fullan (2015) also noted that psychological states, personalities, previous experiences, and career stage influence individual and collective teacher factors. Investigating these areas however, was beyond the scope of this study.

The Ministry of Education. Fullan (2015) acknowledged the critical role that the Ministry of Education plays in developing the conditions for effective system-level reform. It was beyond the scope of this study to collective information regarding the MOE's theory of action for supporting the implementation of the *ELL Policies and Procedures* (2007). Therefore, beyond providing funding for Provincial Leads and board projects and the creation and dissemination of resources (e.g., *STEP Steps to English Proficiency: A Guide for Users*), the MOE's contribution for developing the conditions for policy implementation in school districts across Ontario is not included in this study.
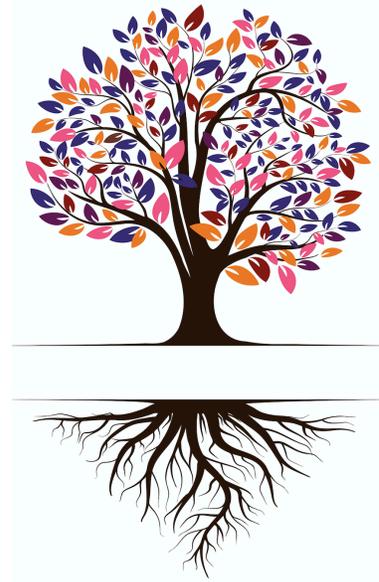
Conclusion

This study suggests a number of important implications for policy, practice, and further research. Most importantly, the findings demonstrated that the *ELL Policies and Procedures (*2007) is not being implemented uniformly in schools. The *ELL Policies and Procedures* (2007) states:

> "The implementation of this policy will result in a consistent approach to the education of English language learners across the province, while also affording the flexibility school boards need to meet their local needs, build capacity, and enhance program viability" (p. 10).

While full implementation fidelity is an expectation of the Ministry of Education and a requirement of all publicly funded English-speaking school boards in Ontario, findings from this study indicate incomplete and inconsistent implementation. Thus, the intent to create a "consistent approach to the education of English language learners across the province" is not being realized.

Massouti (2018) argued that the analysis of the adoption of inclusive education policies in Ontario schools must be viewed as a complex and context-sensitive process. With context-sensitivity in mind, in trying to understand the complexities of what it takes to turn *ELL Policies and Procedures* (2007) into daily practices for classroom educators and school and system leaders, Fullan's (2015) list of nine factors that affect policy implementation provided a useful framework. In the previous section, the different ways in which each of these factors influenced the implementation of the *ELL Policies and Procedures* (2007) was discussed.

The intention of the *ELL Policies and Procedures* (2007) was to "promote good outcomes for English language learners" (p. 7). This report highlights the potential of

professional development (engagement in board projects) in:

- helping boards identify and address their local needs;
- promoting an asset-based view for supporting ELLs amongst classroom educators;
- creating spaces for meaningful collaboration between ESL/ELD teachers and mainstream teachers;
- increasing teachers' efficacy and capacity to meet the needs of ELLs.

While educational policy may not explicitly explain how to enact particular mandates, it can help to focus school improvement efforts and influence how goals and educational outcomes are set, measured, and monitored. This report also highlights the need to create a sense of urgency to focus board and school improvement efforts on addressing the needs of English language learners in many districts across Ontario. This report highlights the need for:

- further professional development for classroom educators and school and system leaders;
- greater clarity regarding certain policy components;
- additional resources to support policy implementation;
- continued support for ESL/ELD Coordinators who advocate for ELLs in their boards.

Understanding the perspectives of those who are responsible for policy implementation is essential to ensuring that the next phase in supporting uptake can serve to strengthen how the *ELL Policies*

and Procedures (2007) is interpreted and enacted in schools across Ontario. The serious consideration of the evidence presented in this qualitative study could result in a stronger theory of action for supporting *ELL Policies and Procedures* (2007) implementation.

Finally, directions for future research could focus on the role of school leaders in enacting policy development. Evans (2009) noted that "leaders act as policy mediators who convey the significance of accountability and achievement of all students and groups of students" (p. 85). Fullan (2015) also noted how "principals' actions serve to legitimize whether a change is taken seriously (and not all changes are) and to support teachers both psychologically and with resources" (p. 99). For these reasons it would be important to understand school leaders' perspectives regarding *ELL Policies and Procedures* (2007) implementation.
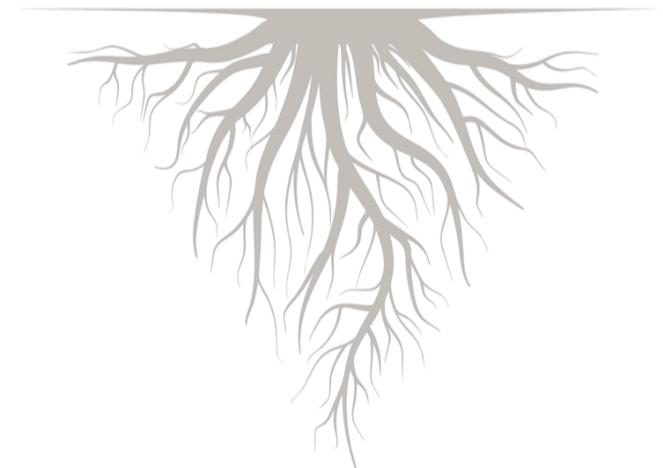
Limitations

There are a few limitations to this study. The data obtained from the website scans was limited. Although most boards have not adhered to the requirement to include a section on their board improvement plans to specifically address the needs of ELLs, that doesn't mean that there aren't strategies in place. The evidence gathered from websites did not provide insight regarding supports for ELLs that boards chose to not make available to the public through their websites. Another limitation involves the sampling procedure. The potential of biases is a disadvantage of convenience sampling and the sample used in this study was not representative of the entire population. Finally, artifacts from the most recent board projects (2019-2020) were limited due to the reasons outlined earlier in this report.
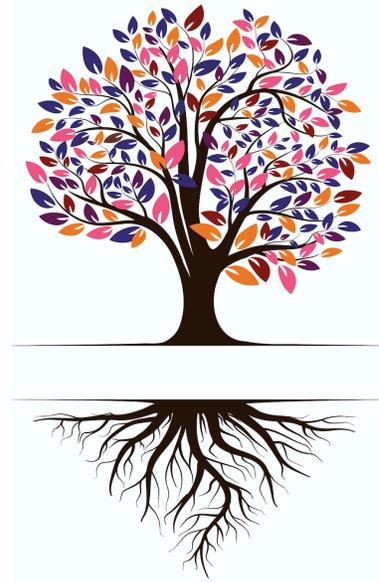
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ENDNOTES:

[1] For the definition of English Language Learners please refer to 1.2 Ontario Ministry of Education. (2007). *English Language Learners ESL and ELD Programs and Services, Policies and Procedures for Ontario Elementary and Secondary Schools, Kindergarten to Grade 12.* Toronto, ON: Queen's Printer for Ontario.

[2] ERGO is the ESL/ELD Resource Group of Ontario ESL/ELD Subject Association K-12.