



Sankofa Freedom Academy ELL Policy and Program for English Language Learners / Limited English Proficiency Scholars

2026-2027

In compliance with Title 22, Chapter 4, Section 4.26 of the Curriculum Regulations of the Commonwealth of Pennsylvania, Sankofa Freedom Academy Charter School will provide a program for every student who is found to be Limited English Proficient or English Language Learners. Sankofa Freedom Academy Charter School is committed to carrying out its responsibility to identify, support, and service each of English Language Learners through the implementation of a program based on sound educational and language learning theory, implemented with sufficient resources, staffed by appropriately qualified personnel, and is periodically evaluated. These mandates and interpretations are based on the Pennsylvania Regulations, Chapters 4 and 11; and on federal law, including Title VI of the Civil Rights Act, the Equal Educational Opportunity Act (EEOA), the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA), and regulations and case law under those statutes. Thus the Sankofa Freedom Academy ELL program includes the following:

1. Identification Process:

- a. In order to identify ELL students, Sankofa Freedom Academy will administer a Home Language Survey (HLS) annually to its student body to ascertain whether there are Sankofa Freedom Academy students from homes where a language other than English is spoken or whether the student speaks a language other than English in order to determine PHLOTES (Primary home language other than English learners)
- b. As a part of the in-take process all admission applications include a questionnaire designed to identify families in which a language other than English is spoken.
- c. The results of this survey will be entered into the permanent student folder and to local and state officials
- d. Sankofa Freedom Academy Charter School will check its list with the data available from the School District of Philadelphia's Database to ensure that all ELL students have been identified as well as the academic records from previous schooling.
- e. A list of PHLOTES students will be established, maintained, and made available to appropriate staff and reported to those state and local agencies that may be appropriate.

2. Proficiency Assessment

- a. If a review of the survey data reveals a student speaks a language in addition to English (i.e. a PHLOTES student), Sankofa Freedom Academy will administer the **K-MODEL or K-SCREENER**, WIDA Screener and Placement (Paper) test.
- b. Upon completion of screening, if the student's scores meet the criteria then students will be provided services based on the PA Language and Proficiency levels of: entering, beginning, developing, expanding, and bridging.



- c. Sankofa Freedom Academy Charter School will begin ELL instruction within 30 days of the beginning of the school year or within 14 days of the admission date of the student. Instruction for the ELL or LEP student will be dependent on the levels as indicated by the assessment in the areas of listening, speaking, reading, and writing.
- d. Using a questionnaire, a determination will be made if the student has limited or interrupted formal education (LIFE) using the following criteria:
 - i. Grade three or higher
 - ii. Has a literacy score of less than 3.5 on the WIDA Screener
 - iii. Has at least two fewer years of age appropriate schooling than peers **or** has unenrolled from U.S. schools to enroll in schools in other countries (including Puerto Rico) more than two times in the past four years
 - iv. Has limited encoding/decoding skills in native language (as indicated by family interview and/or native language measures and/or review of academic records and/or local measures)
- e. A parent notification of the student assessment results and placement in the ESL program will be sent home within 14 days of placement. The letter will contain a detailed program description and explain identification and placement decisions. Parents have the right to refuse placement in a specialized, separate LIEP.
- f. If a student arrives with an IEP or is suspected of having a disability (i.e. parent informs enrollment personnel that the student has a disability), then enrollment personnel must coordinate with Special Education staff to complete this procedure.

3. Program Components:

- a. As a Freedom School, which believes in cultural democracy, Sankofa Freedom Academy is committed to developing a program that encourages the acquisition of language proficiency while celebrating and encouraging the culture and honoring the language of its ELLs. Thus, our program is designed to be EL-Specific Transitional Instruction which encompasses the student's native language as a source of supporting English proficiency acquisition, but proficiency in a student's native language is not a main program goal. Objectives of the program is to develop both basic interpersonal communication skills (BICS) and cognitive language proficiency (CALP), to develop proficiency in the language domains of listening, speaking, reading and writing, to develop and encourage participation in a full range of instruction activities and extracurricular activities in our school. Each objective and program component is geared towards students making progress within the PA academic standards as well as growing to become productive members of our community as aligned with SFA's mission and vision.
 - i. However, in the event that a critical number of students are discovered with common proficiency levels in the same language, Sankofa Freedom Academy Charter School will establish a bilingual program. This is in keeping with the culturally responsive philosophy of the



school, which sees language as the foundation of culture. Sankofa Freedom Academy Charter School is committed to centering education within the cultural context of the student. This approach will empower the student to maintain fluency in the primary language while achieving proficiency in English.



- ii. Newcomer Program: In the event there is a large number of newcomer students at higher grades, a specialized newcomer program with self-contained, sheltered content classes and intensive, direct ELD instruction with mechanisms to transition students to other LIEPs when they are ready. If a large number of ELs speak the same language, Sankofa Freedom Academy Charter School will employ bilingual staff to provide support in the students' native language if possible.
- iii. In that the PHLOTES come from a range of cultural and linguistic traditions, pull out and push in ESOL/ESL/ ELL will be provided that are designed to build proficiency in oral and written communication. These services will be rendered so as to celebrate the language of the student while building proficiency in English.
- iv. In keeping with commonwealth recommendations daily instructional time by both ESL and non-ESL teachers are provided. English direct (ELD) instruction provides systematic, explicit, and sustained language instruction designed to prepare students for the general academic program by focusing, in meaningful and contextualized circumstances, on the academic language structures that underpin social and academic constructs. ELD can be taught as a stand-alone class or course but may also be embedded within other courses with the direct support of an ESL program specialist as appropriate based on the program design and needs of the students. It must also be incorporated into all classes taught by non-ESL licensed teachers in which ELs are enrolled. These teachers are responsible for deliberately planning for and incorporating language instruction as well as supports, modifications, and accommodations needed to allow ELs to access the standards to which the course is aligned. The PA ELPS (English Language Proficiency Standards) are an overlay to the academic standards and will be incorporated in planned instruction for ELLs by all teachers. Content area instruction will be aligned with corresponding standards and modified to meet the needs of the students. The accommodations and modifications provided will be developed collaboratively by the ESL teacher and the grade level/content teacher. Appropriate academic support will be provided to ELLs within the content course and may include an ELL teacher or supplemental materials.

4. Student Placement and Supports:

- a. To ensure that ELL and LEP scholars have success across content areas, Sankofa Freedom Academy will monitor the progress of scholars across the content areas and support teachers in making accommodations for the necessary students.
- b. In keeping with its culturally responsive philosophy and in order to establish a culturally and linguistically rich environment, all Sankofa Freedom Academy classes will infuse common terms and terminology in the languages spoken in the school community. Items in classes will be labeled in languages represented in the community so as to enrich the entire community.
- c. To ensure that ELL / LEP students are linked to community based organizations that provide extracurricular activities and offer appropriate support, Sankofa Freedom Academy



Charter school will establish relationships with community and faith based organizations that serve ELL / LEP families.



5. Proficiency Monitoring and Assessment:

- a. In order to determine when a student is ready to move from one proficiency level to another multiple measures will be utilized in order to provide information on the student's capacity in listening, speaking, reading and writing with proficiency.
- b. Annually all students will be given the Annual State English Language Proficiency Assessment (ACCESS 2.0) for all students receiving LEP/ELL/ESOL services.
- c. ELL / LEP students will not be exempt from taking the PSSA/Keystone but will be provided state accommodations as provided in state statute.

6. Reclassification/Exit Criteria: According to the Pennsylvania Department of Education, exiting or reclassifying an English Learner (EL) from an active English Language Development (ELD) program requires an overall composite score of 4.5 or higher on the annual WIDA ACCESS for ELLs assessment, combined with standardized language use inventories. In order to be re-classified from the ESL program, students must meet either of these test criteria:

- a. Using the following system, the ACCESS for ELLs® and the language use inventory together produce a single score. If that score exceeds the state-defined threshold of 4.5, then the student is eligible to be reclassified.
- b. An ESL teacher must complete one of the inventories when possible. The other inventory may be completed by a single content teacher or a team of content teachers.
- c. Language use inventories must be completed prior to the release of ACCESS scores each year for students who, based on teacher input and previous ACCESS scores, are likely to reach the threshold. Once ACCESS scores are released, the points are added to the points from the rubrics to determine if students are eligible to be reclassified.
- d. Post-Exit Monitoring: Exited students must be actively monitored for academic progress for two years following reclassification.
- e. **Removal of Academic Criteria:** State and federal alignment rules prohibit using academic achievement tests (like the PSSA or Keystone) as a direct barrier or criteria in EL reclassification decisions.

The following tables display the points possible from the language use inventories:



Language Use Inventories		Initial	Transitional	Independent
ESL Teacher	Listening	0	0.5	1
	Reading	0	0.5	1
	Speaking	0	0.5	1
	Writing	0	0.5	1

Language Use Inventories		Initial	Transitional	Independent
Content Teacher	Listening	0	0.5	1
	Reading	0	0.5	1
	Speaking	0	0.5	1
	Writing	0	0.5	1

Total possible points from both inventories 8

Threshold for reclassification

Students with lower qualifying ACCESS scores (4.5–4.8) must demonstrate stronger and more consistent Independent language use in the classroom to support reclassification. As ACCESS scores increase, fewer rubric-based confirmations are required. This approach ensures that reclassification decisions reflect both standardized assessment data and observable language performance, with additional scrutiny applied to students whose ACCESS scores are closer to the eligibility threshold.

ACCESS Proficiency Level Score	Minimum combined language use inventory score	NOTE: Students who do not achieve an overall composite proficiency level of 4.5 or higher are NOT eligible for reclassification. There are no exceptions.
4.5 – 4.8	At least 7.0 points	
4.9 – 5.2	At least 6.0 points	
>5.2	At least 5.0 points	

When a student achieves the minimum reclassification scores, they should be reclassified. However, if there is compelling, documented evidence indicating that a student should remain identified as an English Learner despite exceeding the cutoff, and this evidence is maintained alongside the ACCESS score report and language use inventory, the student's EL status may be retained.



Reclassification of ELs with Disabilities

An EL with a disability may be considered for reclassification if:

1. The student has an IEP, **AND**
2. The student has been continuously enrolled in an ESL/bilingual education program for at least four years, **AND**
3. The student's overall composite proficiency level score on the ACCESS for ELLs® has not increased by more than 10% at any point or total over the three most recent testing cycles, **AND**
4. The school has documented evidence** that the student has been provided with the appropriate level of language support, including ELD instruction, throughout his/her enrollment in the LIEP, **AND**
5. A school-based team recommends reclassification. *See below for team composition and recommendation protocol.*

* For students who cannot complete all four domains of the test as a direct documented result of their disability, the state has adopted a method for calculating an overall composite score with fewer than all four domains. LEAs may use the overall composite score calculation tool (for ELs with disabilities) linked below. This tool has been updated using the concordance tables from WIDA to allow the use of 2026 scale scores. For students who take the Alternate ACCESS, use the sheet linked below. DO NOT USE PREVIOUS VERSIONS OF THIS TOOL.

[Less than four domains overall composite score calculation tool \(for ELs with disabilities\)](#)

Please review the instructions for using this tool on the first tab before proceeding.

This tool may **only** be used for students who have IEPs and documented disabilities that prevent them from participating in up to two domains of the ACCESS or Alternate ACCESS.

** Documented evidence can include schedules indicating ELD instructional times, specific language supports used, ELD curriculum indicating areas of language instruction covered, language use evaluations based on WIDA rubrics or PA reclassification rubrics, modifications made to assessments, IEP addressing ELD instruction or language needs, etc.



7. ELLs with Disabilities

ELLs may be eligible for Special Education. The IEP team must consider the need for ESL instruction as they address all students' needs related to the provision of Free Appropriate Public Education (FAPE). In determining the student's needs, IEP teams must consider both special education services and ESL instruction simultaneously, as appropriate. All procedures for the screening, evaluation, IEP, and the provision of services and/or instruction must be in compliance with the Individuals with Disabilities Education Act (IDEA) and PA Chapter 14 Regulations.

a. *The academic program*

ESL /Bilingual programs are identified in The Pennsylvania School Code of 1949, Chapter 4, Section 4.26, as general curriculum. The academic program for an ELL with a disability must consider ESL just as it must consider any other general curriculum services available to non-disabled students. Programmatic decisions regarding ELLs with disabilities should be made by the IEP team with appropriate representation. Special education services do not replace an English language instructional program.

b. *Participation in assessments*

ELLs with disabilities participate in all assessments, including the annual state assessment, Keystone and PSSA (or PASA , if appropriate) in accordance with 34 CFR § 300.160. Participation in state and local assessments is documented in Part III of the IEP. An ELL student with a disability may participate in assessments through the use of one or more state-approved accommodations appropriate for his/her disability.

c. *Program exit for LEP students*

In accordance with federal guidance outlined in the document, *Questions and Answers Regarding Inclusion of Limited English Proficient Students with Disabilities in English Language Proficiency Assessments and Title III Annual Measurable Achievement Objectives* , U.S. Department of Education, March 2006, **the LEP designation cannot be removed from a student unless that student has met all of the required state exit criteria** . Refer to the current Pennsylvania state required Exit Criteria document.

8. Monitoring of ELLS after language instructional program exit

Students are monitored for two years after exiting ESL using a review of grades, benchmark tests, standardized test, portfolio assessment, and teacher feedback.

9. Communication with Parents

Sankofa Freedom Academy Charter School acknowledges its responsibility to provide parents with information about assessment, academic achievement, school codes and policies in the native language of the parent or in



their preferred mode of communication. To do this, Sankofa Freedom Academy will establish a list of bilingual advocates in multiple languages in order to insure that its families are served appropriately.



Parents of currently enrolled ELs must be provided with the following information within 30 days of the start of each school year:

- a. A notification of their child's continued participation in the LIEP
- b. A description of the LIEP including its intended benefits for their children and an explanation of its effectiveness
- c. A notification of their right to refuse services as outlined in this document

At Sankofa parents of newly enrolled ELLs will be provided the following within 30 days of the beginning of the school year or 14 days of admission of student to the LEA.

1. a description of the EL identification process and the reason that their child was identified as an EL
2. their child's current English proficiency level and a description of what that means
3. a description of the ELL program as outlined in this document
4. information explaining their right to refuse enrollment of their child in receiving services in the program
5. a description of the criteria for reclassification and an expected timeline for achieving proficiency
6. grievance procedures and notices of non-discrimination
7. report cards distribution dates
8. results of the annual English proficiency assessment, ACCESS for ELLs®

10. Grading

The report card/progress report is used to communicate English language development information to parents of ELs as well as needed parent communication throughout the semester. On report cards, Sankofa Freedom Academy Charter School will utilize the same grading system as content courses for all students. On High School Transcripts- the ELL program will show as a full credit course.

11. Retention of ELs

At SFA Charter School, An ELL may not be retained in a grade based solely on his/her lack of English proficiency. Evidence must be provided that all appropriate modifications and accommodations to instruction and assessment aligned to the student's English language proficiency to allow the EL meaningful access to the general curriculum as well as to promote second language learning were implemented and documented over time prior to considering grade retention.

12. Staffing

To address the needs of our ELL scholars for whom Spanish is the primary language, a bilingual staff member will be available to provide translation services for Spanish speaking families. Similar staffing will be sought to support ELL scholars whose language is based on languages other than Spanish. Sankofa Freedom Academy will also provide ELL services by a PA certified teacher. No ELL teacher will have a caseload that exceeds 25 scholars without additional supports. Our ELL teacher will collaborate with the classroom teachers and when appropriate, co-teach with regular education teachers who serve ELL children.

13. Professional Development

In alignment with the SFA Professional Development Plan, the Sankofa Freedom Academy Charter School staff



will engage in professional development annually in order to build capacity among staff in creating ELL friendly environments, infusing culture and language into the culturally responsive classroom, and in strategies that will empower faculty in providing support for the academic and socialization achievement of ELL / LEP students.



Training will also be given for faculty to incorporate the PA ELSP PreK-12, which is an overlay to the academic standards and is used in planned instruction.

14. Qualified ELL Educators

At Sankofa Freedom Academy Charter School, a facilitator who provides specialized English language development instruction (ELL/ESL/ELD) and who provides a grade for the ELD instruction either in a content class setting or a separate setting must hold a PA Instructional I or II certificate AND the ESL Program Specialist Certificate.

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