

City Council Bill 24-0584 **Baltimore City Government Entities – Language Access**

October 23, 2024

Baltimore City Public Schools (City Schools) has reviewed City Council Bill 24-0584, which seeks to provide the Mayor’s Office of Immigrant Affairs (MIMA) with discretion to designate covered entities to appoint a language access liaison, adopt a Language Access Plan, provide language access services to specified individuals, and establish ongoing reporting requirements.

City Schools appreciates the spirit of the proposed legislation and agrees with the importance of providing language access services to residents. It is our understanding that MIMA will focus on designating city and quasi-city agencies for the purposes of this legislation, and will not target entities such as City Schools that fall under the purview of the State of Maryland. As such, City Schools has no objection to Council Bill 24-0584.

It is important to understand that as one of the nation’s public school systems, City Schools’ language access obligations are already set forth in extensive regulation under state and federal law. Per Title VI of the Civil Rights Act, the district is required to take steps to ensure parents and students with limited English proficiency (LEP) can meaningfully participate in school activities and receive information in a language they can understand.

Additional court rulings and various regulations further define City Schools’ existing responsibilities related to ensuring meaningful access to education by providing language access services to LEP individuals. These include the federal Equal Educational Opportunities Act (EEOA), which prohibits discrimination against students, staff, and faculty based on factors including national origin. The EEOA requires school districts to take appropriate steps to overcome language barriers for English Learner students, including providing language assistance programs. Specific examples of City Schools’ existing requirements include:

- **Identifying LEP students:** Schools must identify students with limited English proficiency.
- **Providing language assistance:** This includes the hiring of bilingual staff, translation services for important documents, interpretation for parent-teacher conferences, and dedicated English language learning programs.
- **Communicating with parents:** Schools must provide information to parents in a language they understand, including important school announcements, student progress reports, and school policies.

In order to comply with federal requirements, the Multilingual Learners/Title III Office of the Maryland State Department of Education works with local education agencies – including City

Schools – to ensure that quality, research-based English language development programs are offered to multilingual learners.

At the federal level, the U.S. Department of Education's Office of English Language Acquisition (OELA) provides national leadership to help ensure that English learners and immigrant students attain English proficiency and achieve academic success. The legislation that guides OELA's programs includes Title III of the Elementary and Secondary Education Act, which focuses on language instruction for Limited English Proficient and immigrant students.

With respect to City Schools specifically, our Multilingual Enrollment and Support Center (MESC) assists multilingual families with the processes of enrollment, transfer, and school choice. When families visit MESC, they are greeted by staff who determine their home language and whether they would like interpretation services. If the family's home language is English or Spanish, they are served face-to-face by a staff member in that language. If their home language is not English or Spanish, MESC staff use ACSI interpretation and translation services. ACSI provides over the phone (OPI) or video remote (VR) interpretation. All of our schools also have access to ACSI and can use this service to better communicate with families.

Additionally, there are resources and supports for multilingual families that are managed by City Schools' Office of Communications, Engagement, and Enrollment (OCEE) including two Multilingual Family Engagement Specialists whose positions are in alignment with requirements from MSDE. We also provide schools with interpreters for group family meetings upon request.

Finally, given the ever-changing needs of City Schools' students and families, we are currently in the process of developing a landscape analysis to examine how we conduct business with multilingual families. This assessment will take into account our current practices at schools and the district office, and ultimately culminate with an implementation plan based on the report findings of what we are doing well and where we could be doing more to serve those with limited English proficiency.

In closing, City Schools is deeply committed providing services for multilingual students and families across our schools and at the district office. Given the extent of existing state and federal laws with which we must already comply, City Schools appreciates that we will not be designated as a covered entity under Council Bill 24-0584. We are grateful for our existing relationship with MIMA and look forward to further collaboration moving forward.