

**COMPLAINT TO THE U.S. DEPARTMENT OF EDUCATION,
OFFICE FOR CIVIL RIGHTS
CONCERNING LIMITED-ENGLISH PROFICIENT LEARNERS IN
THE HARTFORD PUBLIC SCHOOLS**

Center for Children's Advocacy

April 11, 2007

I. OVERVIEW

This Complaint is filed on behalf of limited-English proficient ("LEP") students enrolled in the Hartford Public School District ("the District") in Hartford, CT and their parents. The LEP students and their parents that this complaint refers to are Somali-Bantu, Liberian, and Spanish-speaking and are listed under separate cover.

On behalf of these clients and the parents and children in Hartford from the Somali-Bantu and Liberian communities, we ask the Office of Civil Rights to intervene on the following issues:

- The District has not developed or implemented an adequate system for communicating with non-English speaking parents who are also non-Spanish speaking.
- The District has failed to adequately identify students who have been in this country for less than three years (hereafter "New Arrivals") for special education services.
- The District's New Arrival students who have not previously attended school cannot access the curriculum because they are placed in classes with their same-age peers that do not teach content to them in a manner that they understand. "Scaffolding," the teacher strategy which the District purports to employ, is ineffective given these New Arrival students' lack of previous education. Additionally, teachers lack sufficient training in this methodology and find it difficult to employ.
- Bilingual students use outdated and/or inappropriate textbooks and also do not have the appropriate classes available to them.
- Bilingual students have not been identified to receive Language Transition Support Services (LTSS) even though they have not met English mastery criteria.

As a result, these students and their parents are being denied equal access to, and equal treatment within, the District's educational program, in violation of Title VI of the

Civil Rights Act of 1964 (“Title VI”) and the Equal Educational Opportunities Act of 1974 (“EEOA”). We ask that OCR correct the District’s violations, *inter alia*, by requiring it to create an adequate system for translation and interpretation¹; to ensure that students and parents obtain all school-related information in a language and form they understand; to develop, disseminate and implement procedures on the evaluation of New Arrivals for special education; to implement measures so that students can access the curriculum, including improved teacher training, appropriate materials for both students and teachers, additional tutors, and the creation of a New Arrivals Center where students can receive intensive English as a Second Language (hereafter “ESL”) and math instruction before being placed in classes with their same-age peers; provide textbooks and classes for bilingual students that are comparable to those offered to mainstream students; and develop and implement procedures so that bilingual students are not exited prematurely from LTSS.

We further request that OCR monitor and review the District’s actions to ensure enforcement and implementation.

II. FACTS AND APPLICABLE LAW

A. Background

According to the Immigrant Children and Youth Survey for Fiscal Year 2005-2006, 2,400 of the District’s enrollees are “new immigrants,” meaning that they have lived in the United States for three years or less.² Like the students referenced in this Complaint, some of these LEP students come from countries and refugee camps that do not provide them with schooling. These students and their parents have the same needs and require the same accommodations as the students and parents in this Complaint.

The Somali-Bantu and Liberian youth have been enrolled in the District for at least two years and came to the United States as refugees. Both these groups of students have had limited educational exposure, and many have never attended school before their residence in the United States. The District currently has approximately forty-six Liberian students and fifty-six students from Somalia.³

¹ In this Complaint, we will use “translation” to refer to the transfer of information from one language to another in writing and “interpretation” when the information is transferred orally, regardless of format.

² Appendix A: Immigrant Children and Youth Survey For Fiscal Year 2005-2006.

³ Ibid.

The Liberians' native language is English, spoken with a variety of dialects, including Grebo, Krahn, Kru, and Kpelle. The Somali-Bantu's primary language is Maay Maay. The District does not offer Somali-Bantu students a bilingual education program, presumably because no single school in the District has the twenty requisite students needed to trigger the creation of a bilingual education program, pursuant to Connecticut General Statutes § 10-7f. The District does offer a bilingual education program for Spanish-speaking LEP students. Spanish speaking students in the District come from a variety of countries, including Argentina, Brazil, Chile, Columbia, Costa Rica, Cuba, the Dominican Republic, Ecuador, El Salvador, Grenada, Guatemala, Honduras, Mexico, Nicaragua, Panama, Peru, Spain, Uruguay, and Venezuela,⁴ the territory of Puerto Rico and the United States.

The Center for Children's Advocacy ("CCA") became aware of the above mentioned problems in the spring of 2005 when District staff approached CCA with concerns about New Arrival students. Shortly thereafter, CCA staff met with District personnel to address these problems. Since that time, CCA was contacted by the Hartford Refugee Resettlement Group, which consists of a group of concerned Hartford service providers who advocate for the needs of the refugee community.

On May 18, 2006, CCA sent a letter to the District outlining its concerns.⁵ A meeting was held on May 22, 2006 with District officials and members of the community. On June 22, 2006, CCA attorneys met with the District's Bilingual Department chair and instructional coach to discuss CCA's concerns regarding summer and academic year programming and measures for tracking student progress.⁶ After this meeting, CCA sent a follow-up letter on June 30, 2006 that confirmed the contents of the meeting.⁷

An ESL 1 class was offered as part of the District's 2006 Summer Academy, as agreed at the June 22nd meeting. However, because of the quality of the outreach and the low numbers attending the class, CCA sent another letter to the Bilingual Department on

⁴ Ibid.

⁵ Appendix B: Letter to Ana Maria Olezza, Director, Bilingual/Bicultural Department, Hartford Public Schools, from CCA Attorney Emily Breon, May 18, 2006.

⁶ Appendix C: Agenda for June 22, 2006 Meeting between Hartford Public Schools and CCA Re: New Arrivals.

⁷ Appendix D: Letter to Ana Maria Olezza, Director, Bilingual/Bicultural Department, Hartford Public Schools, from CCA Attorney Emily Breon, June 30, 2006.

July 10, 2006.⁸ (Only four students were in attendance in early July 2006, even though the District's Bilingual Department Chair indicated that twenty-six students were enrolled in the class.)

On August 31, 2006, CCA sent a letter to the District's Acting Superintendent, which a number of community organizations endorsed.⁹ The letter explained that despite CCA's advocacy efforts on behalf of New Arrival students during the past year and a half, a number of unresolved issues remained. The District responded with a letter on October 31, 2006.¹⁰ However, as this Complaint will illuminate, numerous issues continue to remain unresolved. As a result, we request OCR's intervention.

B. Communication

1. Facts

The District's failure to take basic steps to overcome language barriers (e.g.: using pre-recorded audio or visual information; using translation telephone lines) has prevented, and continues to prevent, non-English and non-Spanish speaking students and their families from having equal access to the District's educational programs and services. For example, the District has explained that its method of communication with Somali-Bantu families is to request that tutors, usually employed by Catholic Charities Migration and Refugee Services (the principal relocation agency for refugees in Hartford), translate for school building principals or teachers on an as-needed basis. This procedure is inadequate in that the District relies on too few tutors to serve this crucial role. Most of the tutors work only part-time, and are unable to make home visits.

The District has also not informed Somali-Bantu parents about this procedure for communication. On December 16, 2006, CCA trained over thirty Somali-Bantu adults on the educational rights of children and their parents. None of the participants were aware of this process for communication with the school. To their knowledge, the District has not sent any materials to them that explain the process of contacting tutors or encouraging them to use tutors for interpretation services.

⁸ Appendix E: Letter to Ana Maria Olezza, Director, Bilingual/Bicultural Department, Hartford Public Schools, from CCA Attorney Emily Breon, July 10, 2006.

⁹ Appendix F: Letter to Dr. Jacqueline Jacoby, Acting Superintendent, Hartford Public Schools and Mayor Eddie A. Perez, Chair, Hartford Board of Education, from CCA Attorney Emily Breon, August 31, 2006.

¹⁰ Appendix G: Letter to CCA Attorney Emily Breon from Dr. Jacqueline Jacoby, Acting Superintendent, Hartford Public Schools, with attachments, October 31, 2006.

The District has not met its responsibility to adequately notify the Somali-Bantu families in their native language of the same activities it calls to the attention of other families within the District. As a result, the Somali-Bantu parents feel cut-off from their children's educational experiences and are frustrated by their limited involvement. For example, some parents have attended parent-teacher conferences only to find that school staff have not arranged for interpretation. Other children have been suspended or received detentions. The parents, wanting to know the reasons for the disciplinary measures, have contacted the school, but they were not provided with an explanation in a language that they could understand. Because of the lack of interpretation services and the fact that written notices are in a language that the Somali-Bantu cannot understand, parents cannot respond to information sent by the District until one of the few members of the community who speaks both English and Maay Maay comes to the house to translate. Jody Putnam, Director of the Refugee Assistance Center at Jubilee House, has visited Somali-Bantu parents who have shown her important and timely notices related to such issues as dental problems and free tutoring that have gone unread, even though deadlines have passed.

For the District to overcome the language barriers of the Somali-Bantu students and their families, it is critical that the District acknowledge that most of the parents have little or no written language skills, even in their own language. The District currently sends all of its notices to the Somali-Bantu in English, in writing, including academic progress reports, disciplinary notices, and invitations to school events, none of which they can understand.

These problems must be addressed not only for the sake of the families whose children are already enrolled in school, but also because there is a number of young Somali-Bantu children who will be enrolling in school during the next several years. There are also new refugee families continually arriving in Hartford. Additionally, although the adults continue their efforts to learn English, it is very likely they will need translation services for some time.

2. Law

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of

race, color, or national origin, in any of their activities. Title VI, 42 U.S.C. §2000(d) provides:

No person in the United States shall, on the ground of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

See also: 34 C.F.R. § 100.3 (a). The term “program of activity” is broadly defined and includes programs and services offered by public schools, including those of the District.

See 42 U.S.C. §2000d-4a.

Implementing regulations under Title VI provide, at 34 C.F.R. § 100.3(b)(1)(i), (b)(1)(ii), and b(1)(iv), that a recipient may not, on the basis of race, color or nationality:

- (i) Deny an individual any service, financial aid, or other benefit provided under the program;
- (ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program; ...
- (iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program.

Further, a recipient may not “utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respect individuals of a particular race, color, or national origin.” § 100.3(b)(2).

These provisions have been interpreted to require, *inter alia*, that school districts ensure persons with limited-English proficiency are not excluded, because of a language barrier, from effective participation in the district’s program and services. *Lau v. Nichols*, 414 U.S. 563 (1974); *Castaneda v. Pickard*, 648 F.2d 989 (5th Cir. 1981). This obligation includes the duty to provide an effective alternative language program to students not yet able to participate effectively in the regular instructional program. *Castaneda*; OCR Memorandum of December 3, 1985 (hereinafter “December 1985 Memorandum”). A school district must also ensure that information provided to students of limited-English proficiency is supplied in a language and mode of communication that they understand. *Ibid.*

Further, school districts have the responsibility to adequately notify national origin minority parents of the same school activities that are called to the attention of other parents, in their native language where necessary. *Ibid.*; *Tucson Unified School District* (OCR Case No. 08011157, June 18, 2002). *See also* U. S. Department of Justice, *Guidance to Federal Financial Assistance Recipients regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons* (67 Fed. Reg. 41455, June 18, 2002) (detailed guidance on “language access” requirements).

These requirements of Title VI and its implementing regulations are reinforced by the EEOA, 20 U.S.C. §1703, which provides in relevant part:

No state shall deny equal educational opportunity to an individual on account of his or her race, color, sex or national origin, by...

(f) the failure by an educational agency to take appropriate action to overcome language barriers that impede equal participation by its students in instructional programs.

Because these requirements are similar to those imposed by Title VI, the two statutes are often read in conjunction. *See, e.g., Castaneda; Gomez v. Illinois State Bd. of Education*, 811 F.2d 1030, 1040 (7th Cir. 1987).

By failing to establish an effective system for communicating with the Somali Bantu students and their parents, the District has violated these legal requirements.

C. Special Education

1. Facts

On at least three different occasions, District staff reported to CCA that it was the District’s policy not to evaluate any student for special education services until s/he resided in the United States for at least two years. In the case of CCA’s client J.E., a sixteen year old boy from the Dominican Republic, this policy may have denied him an appropriate education since his enrollment in the District in September 2005. Soon after J.E. began school at Hartford Public High School, teachers immediately became concerned that this student might have developmental delays. These teachers discussed the need for a special education evaluation but were told that such an evaluation was inappropriate because J.E. was a New Arrival. In January 2006, a teacher completed an achievement analysis that showed that J.E. was far behind in many areas. J.E. failed all of his 2005-2006 classes.

A Student Support Team (SST) meeting was held in the fall of 2006 to discuss his teachers' concerns. At this meeting, J.E.'s father and step-mother shared information that concurred with teachers' observations and raised further concerns. For example, his parents explained that J.E. did not know his colors, sat and giggled to himself for long periods of time, and that they had concerns about his ability to recall. At the meeting, his teachers reported that they were also concerned with his recall, his behavior and his ability to answer simple questions.

Steps were put into place to help J.E., but a special education evaluation was not requested, even though J.E.'s parents and teachers reported concerns and behaviors that were indicative of an Intellectual Disability. Instead, J.E. was given a placement with the Work Readiness program, where he was the only regular education student. Teachers asked again for a special education evaluation, but the school psychologist told them that she could not test J.E. because he was a New Arrival student and also because, although there were Spanish tests available, none of them were normed for the Dominican population.

Similarly, CCA requested a special education evaluation for B.D., a Liberian tenth grader, based upon a teacher's report that he was making poor progress. At an October 16, 2006 PPT, the school psychologist reported that it was not good "policy" to test students before they had been in the United States for two years and, even if the PPT recommended testing, she did not know what tests would be appropriate to administer to him.

CCA requested a Student Assistance Team (SAT) meeting for R.K., a Liberian second grader who had been receiving repeated out of school suspensions and disciplinary referrals. At the meeting, held on February 9, 2007, school staff reported to CCA that they had not held an SAT meeting on R.K. prior to that date because they had been encouraged to give New Arrival students time to adjust to their new surroundings before starting the pre-referral process. By that point, R.K. had been enrolled in the District for approximately two and a half years.

On two different occasions, CCA requested that the District clarify its policy regarding special education evaluations for New Arrival students in a memo to its staff so that its practice would be in compliance with the law. On November 14, 2006, CCA

brought this issue to the attention of Dr. Romain Dallemand, Assistant Superintendent for Special Education Services, and on November 29, 2006 to Dr. Ana Maria Olezza, Bilingual Department Chair. CCA requested Dr. Dallemand to circulate a memo and cc: CCA on it. Dr. Olezza said that she would bring this issue to the attention of Miguel Pabon, Coordinator of Psychological Services. To CCA's knowledge, no such memos have been circulated, and the practice of refusing special education evaluations to New Arrival students continues.

2. Law

The regulation implementing Title VI proscribes the denial of services and benefits based on national origin. Accordingly, the September 1991 Memorandum requires districts to provide both alternative language services and special education services to students who need both. OCR Memorandum of September 27, 1991 (hereinafter "September 1991 Memorandum"). Clearly, being a New Arrival should not disqualify a student for eligibility for special education services for a certain period of time. The District must institute systems and procedures so that District staff can immediately identify and evaluate for special education services those New Arrival students who are suspected of having a disability.

D. Students Unable to Access Curriculum

1. Facts

Many New Arrivals, particularly refugees such as the Somali, Somali-Bantu and Liberians, enroll in the District without previous education. These students are placed in classes with their peers even though the material is far above their level. For example, CCA's client N.H. is currently enrolled in a math class that uses a textbook entitled, "Middle School Math," even though at a meeting on December 12, 2006, N.H.'s math teacher said that N.H. was able to identify numbers but had not mastered basic addition and subtraction.

The District has explained that it expects its teachers to "scaffold" their curriculum so that its content is understandable to the individual student who may or may not be at the level of his or her classmates. As utilized in the District, this strategy does not afford New Arrivals without previous education meaningful access to the curriculum,

particularly when there is a huge disparity between one student's baseline and that of the rest of the class.

Teachers also lack the materials and training to teach students like N.H., who never attended school before their arrival in the United States. For example, at the December 12th meeting for N.H., her math teacher explained that she lacked the materials to teach N.H., such as pre-kindergarten curriculum materials. At the meeting, comments such as the following were exclaimed: "The school system is not set up for this." "Teachers need more support." At N.H.'s November 8th PPT, her reading teacher from 2005-2006 explained that he needed access to books on tape and/or books at a level that N.H. could understand.

In addition, the current classes in which students like N.H. are enrolled are too large to give New Arrival students like her the attention that they require. Tutors in the classroom, small group instruction or separate classes must be provided. At N.H.'s December 12th meeting, her math teacher explained the difficulty of giving N.H. the requisite attention and also educating the twenty-four other children in the room. At N.H.'s November 8th PPT, a school staff member described how the school periodically asked a special education teacher to provide services to N.H. in order to give her the extra help that she needed, even though special education services were not mandated.

2. Law

A school district must identify which of its national-origin minority students have limited English proficiency, and provide them with an effective program that affords them meaningful access to the District's educational program. December 1985 Memorandum; September 1991 Memorandum. Scaffolding does not afford New Arrival students without previous education meaningful access to the curriculum. The difference between their knowledge base and the knowledge base of their peers is too great for scaffolding to be effective.

Castaneda requires that "the programs and practices actually used by a school system [be] reasonably calculated to implement effectively the educational theory adopted by the school." 648 F. 2d at 1010. Under Title VI, school districts must provide adequately trained staff to implement the educational theory they have adopted. September 1991 Memorandum. Specifically, teachers must receive enough training in

the instructional methods chosen by the school district to give students adequate instruction. *Id.* Even if “scaffolding” were an appropriate teaching methodology for this population, District staff lack the necessary materials, resources and training to implement it effectively. As detailed above, District teachers have felt unprepared to teach New Arrival students and feel overwhelmed by their presence in already large and challenging instructional settings.

E. Unequal Educational Opportunities and Resources

1. Facts

Bilingual students at Hartford Public High School (hereafter “HPHS”) do not have access to the same math curriculum as their mainstream counterparts. For example, HPHS placed students W.S. and T.B. in an algebra class that reviewed the curriculum that they mastered last year because the school did not offer a bilingual geometry class. In addition, no “Ramp Up” math class is offered to ninth grade bilingual students although it is offered to mainstream students. “Ramp Up” is an intensive, two period math class for ninth graders who are more than three years behind grade level in math. While mainstream students benefit from a “Ramp Up” math class that addresses their learning gaps, bilingual ninth grade students lack a comparable opportunity.

Second, the bilingual students at HPHS have outdated textbooks, compared to mainstream students, and, unlike the mainstream students, the bilingual students must use the same textbook for three different classes. For example, bilingual students must use *Una Nación Muchos Pueblos*, published in 1995, for “Civics,” “Foundations of United States History,” and “United States History,” three different classes which HPHS requires. In contrast, English speaking students use *The American Nation* (2005) for “United States History,” *United States History* (2004) for “Foundations of United States History” and *United States Government* (2001) for “Civics.” The mainstream classes stopped using the English version of *Una Nación* several years ago. Despite an email¹¹ and phone calls by the social studies teacher and principal, the bilingual students continue to use *Una Nación*. It was reported to CCA that Bulkeley High School, another school in the District, has a similar problem with its social studies textbooks for bilingual classes.

¹¹ Appendix H: E-mail to Ana Maria Olezza, Director, Bilingual/Bicultural Department, Hartford Public Schools, from XXXX, November 30, 2006.

In addition, the current geography textbook, *Geografía*, that bilingual students use does not offer the same amount or type of information as the mainstream textbook *Geography Alive*. The geography teacher also has only fifty-seven textbooks for her eighty-five students. Since the social studies teacher is mandated to give the bilingual students the same exams that the mainstream students receive, which are based on *Geography Alive*, she spends much of her time translating the information in *Geography Alive* into Spanish for her students.

The textbook *Biología*, used by HPHS's bilingual science class, is also outdated when compared to its mainstream counterpart, *Biology*. *Biología* was published in 1992 while *Biology* was published in 2002. Because of the outdated nature of the information in *Biología*, the science teacher must sacrifice instructional time to translate *Biology* into Spanish for her students. Updates in cell structure, DNA, and genetics are not included in the Spanish textbook. The books are also in poor condition. The science teacher has asked for more updated textbooks for her bilingual students, but, at present, has not received them.¹²

Finally, in the sheltered class "Foundations of United States History," the teacher has one textbook for twenty students. She must spend a great deal of time photocopying information from the book for her students so that they have access to the material.

2. Law

By failing to provide bilingual students with the same courses and quality of textbooks that are available to mainstream students, the school violates the prohibition against giving a "benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program." 34 C.F.R. § 100.3(b)(1). The school must commit sufficient resources to its English Language Learner (ELL) program in order for those students to receive the same educational opportunities as mainstream students. Resources specifically enumerated include providing adequate materials. *See* 1991 OCR Policy Update; 1985 OCR Policy Update. Insufficient course options also constitute a failure to provide equal educational opportunities.

¹² Appendix I: E-mail to Eileen Katz, Chair, Science Department, Hartford Public High School from XXXX, October 27, 2006.

F. Identification of LEP Students

1. Facts

Three of CCA's clients stopped receiving Language Transition Support Services (LTSS) before the students met the District's English mastery standard. For example, CCA client S.N. was not receiving LTSS at the beginning of the 2006-2007 school year. A review of her cumulative file indicates that she stopped receiving LTSS at the end of her sixth grade year, despite the fact that District staff recommended a continuation of services.¹³ After S.N. became CCA's client, a CCA attorney contacted the Bilingual Department on September 26, 2006 via email and received a response on September 27, 2006 that explained that S.N. "was not scheduled properly at the middle school level."¹⁴ To rectify the problem, the Bilingual Department directed HPHS guidance staff to add the appropriate services to S.N.'s schedule, including sheltered classes and a Teaching English to Speakers of Other Languages (TESOL) IV class.

Similarly, when N.B. became a CCA client in the fall of 2006, she was not receiving LTSS. After CCA relayed this information to the Bilingual Department, it determined that N.B. had received LTSS in earlier years but was no longer in receipt of them, although she continued to qualify. However, unlike S.N., N.B. was not amenable to a schedule change, and therefore HPHS did not place her in sheltered classes.

2. Law

School districts must identify all of their LEP students. 1991 Policy Update; *see also* OCR, "The Provision of an Equal Education Opportunity to Limited-English Proficient Students," Aug. 2000 (hereinafter "2000 Memorandum"). Large school districts and those with substantial non-English speaking populations must establish a "formal system for objectively identifying those students whose limited proficiency in speaking, reading, writing, or understanding English denies them the opportunity to meaningfully participate in the regular education environment." 2000 Memorandum; 1991 Policy Update. Furthermore, once students enter LEP programs, they should not be removed from the program "unless they can read, write, and comprehend English well enough to participate meaningfully" in general education programs. 1991 Policy Update.

¹³ Appendix J: S. N., Bilingual Department Records, no date.

¹⁴ Appendix K: E-mail correspondence between CCA Attorney Emily Breon and Ana Maria Olezza, Director, Bilingual/Bicultural Department, Hartford Public Schools, September 26 & 27, 2006.

III. REMEDY

We request that OCR order the District to develop a plan for the education of LEP students that addresses the above issues. Such a plan should include, among other things, the following:

(1) Recruiting, hiring, and training an appropriate number of qualified interpreters and translators;

(2) Providing information to families about enrollment, orientation, student academic progress, special education, health, safety, school discipline and other school-related information in a form and language they understand;

(3) Using translation lines, pre-recorded information, audio and visual formats and other means of communicating with families who do not have a written language;

(4) Developing, disseminating and implementing procedures on the evaluation of New Arrivals for special education;

(5) Providing New Arrival students with materials, like dictionaries, manipulatives, visuals, audio equipment, and math and literacy materials on the appropriate grade level, so that students can access the curriculum;

(6) Hiring additional tutors to assist with clarification of instruction;

(7) Providing increased teacher training so that teachers can scaffold curriculum to the appropriate level of students, when employing that technique is appropriate;

(8) Creating a New Arrivals Center where New Arrival students with no previous formal education can receive intensive ESL and math instruction before being placed in classes with their same-age peers;

(9) Developing an after school support program for New Arrival middle and high school students;

(10) Providing textbooks and classes for bilingual students that are comparable to those offered to mainstream students;

(11) Developing and implementing procedures so that bilingual students are not prematurely exited from LTSS;

(12) Providing compensatory education for N.H., J.E and S.N. because of the above-outlined violations;

(13) Providing any other relief deemed necessary and appropriate; and

(14) Implementing a monitoring system for a period of time until compliance is assured.

We will be happy to provide additional information about the matters raised in this Complaint.

Date:

Respectfully submitted,

Emily Breon
Attorney
Center for Children's Advocacy

cc: Dr. Steven Adamowski, Superintendent, Hartford Public Schools
Mayor Eddie A. Perez, Chair, Hartford Board of Education