

# CITY HEIGHTS PREP

---

## CHARTER SCHOOL

---

### **Policy for Granting Equivalency in a Language Other Than English (LOTE)**

#### **Section 1. Purpose.**

This Policy provides a framework for issuing non-numerical credit equivalent to up to two years (the second level) of high-school instruction in a Language Other than English (LOTE). This policy includes procedures and guidelines for obtaining such non-numerical credit, herein referred to as equivalency or LOTE equivalency, through the following means:

- Equivalency for formal instruction in a LOTE at a school outside of the United States;
- Equivalency by examination;
- Equivalency for private school foreign language instruction, pursuant to California Education Code § 51243 and California Code of Regulations Title 5 § 1632;
- Equivalency by U.S. regionally accredited college or university courses; and
- Equivalency by Certification of Principal or Director, pursuant to guidance issued by the University of California Department of Admissions and consistent with California Education Code 51225.3(c).

#### **Section 2. Equivalency Earned for Formal Instruction in a LOTE at a School located in a Country Outside of the United States.**

**2.1.** Equivalency may be requested by students who have completed formal instruction in a school located outside of the United States where a Language Other than English was used as the primary language (medium) of instruction at the equivalent of U.S. sixth-grade level or higher. Consecutive enrollment is not required.

**2.2.** In order to request equivalency under this Section, the student, parent, or guardian must submit official school academic records or transcripts which reflect formal instruction and satisfactory marks in a course at the equivalent of U.S. sixth-grade level or higher which was taught in a LOTE.

**2.3.** LOTE courses taken in a school outside of the United States and in a school primarily taught in a LOTE may result in LOTE equivalency. LOTE equivalency is available for LOTE courses taken in countries where the primary or official language is not the LOTE which was the primary language (medium) of instruction in the course (e.g., French courses taken at a school in Mexico).

**2.4.** English as a Second or Foreign Language courses taken at a school located outside of the United States where the primary language (medium) of instruction is a LOTE may also result in LOTE equivalency (e.g., English as a Second/Foreign Language taken in a public school in China).

**2.5.** Pursuant to regulations and guidelines governing minimum admission requirements for University of California and California State University, students who apply for and receive equivalency under this Section and who subsequently seek admission to U.C. or C.S.U. may be required to undertake additional documentation requirements by U.C. or C.S.U., which may include re-submission of the “official school academic records of transcripts” referenced in subsection 3.2 above directly to U.C. or C.S.U.

**2.6.** The determination of whether records submitted under subsection 3.2 meet the definition of “official school academic records or transcripts” shall be made in the discretion of the Director or their designee.

### **Section 3. Equivalency by Examination**

**3.1.** Pursuant to California Education Code § 51225.3(c), “[t]he governing board ... shall adopt alternative means for pupils to complete the prescribed course of study that may include practical demonstration of skills and competencies.” Students who have developed proficiency in a LOTE, even in the absence of documented formal instruction in that LOTE, may earn equivalency based on an approved examination.

**3.2.** Based on the results of the approved examination, a student may meet the University of California A-G minimum admission requirements for category or letter “E”. However, it is strongly recommended that all students attempt to exceed these minimum admission requirements.

**3.3.** The following approved examinations may be used to demonstrate proficiency in a LOTE and serve as the basis of a request for LOTE equivalency:

**3.3.1. College Board Advanced Placement Exams.** A student may demonstrate proficiency in a LOTE by scoring a “3”, “4”, or “5” on an AP exam in a Chinese, French, German, Italian, Japanese, Spanish or Spanish Literature & Cultures, or Latin. Such proficiency establishes competency equivalent to 2 years of high-school level instruction.

**3.3.2. Accredited College or University Examination.** A student may demonstrate proficiency in a LOTE by taking an examination given by an accredited college or university. The college or university must issue a statement of LOTE competency on official letterhead to serve as certification of equivalency. Such statement must verify that the administered examination demonstrates competency equivalency to ‘X’ years of high school level instruction.

**3.3.3. International Baccalaureate examinations.** A student may demonstrate proficiency by earning a passing score on any IB HL Language B exam. Such proficiency establishes competency equivalent to 2 years of high-school level instruction.

**3.3.4. School Approved Third-Party Examination.** A student may demonstrate proficiency by earning a sufficient score (as determined in the discretion of the Director or their designee) on an exam pre-approved by the Director or their designee. Such proficiency establishes competency equivalent to 2 years of high-school level instruction.

**3.3.4.1.** For the purpose of establishing equivalency under Section 3.3.4, the Director has approved the [ACTFL Assessment of Performance Toward Proficiency in Languages \(AAPPL\)](#). In order to demonstrate proficiency, students must score at or above each of the following proficiency profiles and target levels for the LOTE in which equivalency is sought:

LOTE Modality	Minimum Proficiency Profile	Minimum Proficiency Level Target
Reading	Intermediate-level tasks, Intermediate-level content	Intermediate High
Writing	Advanced-level tasks,	Intermediate High

	Intermediate-level content and text types, Novice-level accuracy	
Speaking	Advanced-level tasks, Intermediate-level content and text types	Intermediate High
Listening	Advanced-level tasks, Intermediate-level content	Intermediate High

The above-referenced minimum proficiency level targets are described in more detail in ACTFL’s Proficiency Guidelines for Heritage Speakers.

**3.3.4.2.** For the purpose of establishing equivalency under Section 3.3.4 in twenty-five (25) less commonly taught LOTE which are not available for testing under the AAPPL, the Director has approved the [ACTFL Oral Proficiency Interview \(OPI\) and ACTFL Writing Proficiency Test \(WPT\) for the Seal of Biliteracy](#). In order to demonstrate proficiency on these exams, students must score at or above each of the the following proficiency profiles and target levels for the LOTE in which equivalency is sought:

<b>LOTE Modality</b>	<b>Minimum Proficiency Profile</b>	<b>Minimum Proficiency Level Target</b>
Writing (WPT)	Advanced-level tasks, Intermediate-level content and text types, Novice-level accuracy	Intermediate High
Speaking (OPI)	Advanced-level tasks, Intermediate-level content and text types	Intermediate High

**3.3.4.3.** Subsequent to the adoption of this policy, the Director or their designee may approve additional examinations (and related sufficient scores) for the purpose of demonstrating proficiency under 3.3.4 above or may revise existing minimum score requirements for approved exams.

**3.3.4.4.** Students may qualify for testing accommodations, provided by

ACTFL, on exams administered under Section 3.3.4. Students may be evaluated for such testing accommodations by the Education Specialist.

#### **Section 4. Equivalency for Private School Foreign Language Instruction**

**4.1.** Pursuant to California Education Code § 51243 and California Code of Regulations Title 5, § 1632, equivalency may be earned for foreign language instruction received at a private school if each of the following requirements are met:

**4.1.1.** The student seeking equivalency is regularly enrolled and in attendance in grade 9-12 or is applying for admission thereto;

**4.1.2.** The student, or their parent or guardian, on behalf of the student, makes written application for the equivalency, specifying the private school attended and the amount and level of credit requested; and submits a transcript or other documents from the private school evidencing the student's successful completion of the course. The amount of credit sought shall not be less than one semester's work or the equivalent; and

**4.1.3.** The student demonstrates to the satisfaction of the director (or their designee) that his achievement in the foreign language is equivalent to that expected of a student of comparable ability taking the same or similar instruction at the specified level at City Heights Preparatory Charter School. The director's (or their designee's) determination shall be based upon the private school's report of the results of a test given the student by the private school. If the institution was a school located outside of San Diego county, the determination may be based upon a test given the student by City Heights Preparatory Charter School or such other evidence as the principal deems appropriate.

**4.2.** If all above requirements (and the requirements set forth in California Education Code § 51243 and California Code of Regulations Title 5 § 1632 are met), equivalency may be requested if the foreign language instruction was received in a context other than regular day school or boarding school (e.g., concurrent enrollment).

#### **Section 5. Equivalency by Regionally Accredited College or University Courses**

**5.1.** Pursuant to guidance issued by the University of California Department of Admissions and consistent with California Education Code § 51225.3(c), referenced in Section 3.1 above, equivalency may be requested after the completion of certain approved regionally accredited college or university courses in a LOTE.

**5.2.** In order to earn equivalency under Section 5, a student must earn a letter grade of C or better in any UC-transferable course(s) (including conversation) which course is equivalent to two years (second level) of high school language other than English. Acceptable community college courses are listed on the U.C. Transferable Courses list in ASSIST (the U.C. and C.S.U. course transfer and articulation system) with the following footnote: "Corresponds to two years of high-school study."

## **Section 6. Equivalency by Certification of High-School Principal (Director)**

**6.1.** Pursuant to guidance issued by the University of California Department of Admissions and consistent with California Education Code § 51225.3(c), referenced in Section 3.1 above, the Director (high-school principal) may issue a certification as to a student's proficiency in a LOTE which certification may be used to establish LOTE equivalency.

**6.2.** Certification under Section 6 should be based on the judgment and evaluation of language teachers, advice of professional or cultural organizations with an interest in maintaining language proficiency, or other appropriate sources of expertise.

**6.3.** A certification issued under this Section 6 should explicitly state the basis for the certification and the level of proficiency, expressed as "equivalent to 'X' years of high-school level instruction", "equivalent to at least the second level of high school instruction", or other appropriate language indicating a connection between the student's proficiency level and the approximate corresponding level of high-school instruction.

**6.4.** A certification may only be issued under this Section 6 in cases where the LOTE equivalency options set forth in Section 2 through Section 5 above have not been met by or are not available to the student for the LOTE in which equivalency is sought. For example, consider students who speak relatively rare languages (e.g., the Karen Language) for which other equivalency options are not available.

## **Section 7. Requests for Equivalency**

**7.1.** A student or student's parent or guardian may initiate an application or request for equivalency by scheduling a meeting or phone conference with the Director or their designee.

**7.2.** All requests must be supported by official documentation relevant to the equivalency option (Section 2, 3, 4, 5, or 6 above) under which the student is applying.

**7.3.** Evaluation of a request for equivalency and the decision regarding whether to approve or deny a request for equivalency are within the discretion of the Director or their designee.

## **Section 8. Implementation**

**8.1.** The Director or their designee may establish and implement additional guidelines (consistent with this Policy and all applicable laws and regulations) which govern:

**8.1.1.** Applying for (requesting) LOTE equivalency by a student or a students' parent or guardian and associated documentation requirements;

**8.1.2.** Evaluating (approving or denying) LOTE equivalency requests; and

**8.1.3.** Recording or listing LOTE equivalency information on official student transcripts, which guidelines may include adding a notation to the high-school transcript that includes the LOTE and level of proficiency, expressed as "equivalent to 'X' years of high-school level instruction", as recommended by the University of California.

**8.2.** Equivalency applied for and approved under this Policy may be used to meet graduation requirements. However, numerical grade credit shall not be granted for equivalency requested and approved under Sections 2, 3, 4, or 6 of this Policy. Numerical grade credit may be granted for equivalency requested and approved under Section 5 of this policy.

**8.3.** Equivalency applied for and approved under this Policy may also meet minimum admission requirements for University of California or California State University.

However, students, parents, and guardians should be aware that additional documentation may be required by U.C. or C.S.U. during the application process.

<b>Research &amp; Related Resources</b> <i>· remove in final draft ·</i>			
Type	Title	Link	Notes
Model Policy	LA USD BUL-2533.2	<a href="https://achieve.lausd.net/cms/lib/CA01000043/Centricity/doctype/main/22/policies/BUL-2533-2%20Granting%20Equivalency%202017.pdf">https://achieve.lausd.net/cms/lib/CA01000043/Centricity/doctype/main/22/policies/BUL-2533-2%20Granting%20Equivalency%202017.pdf</a>	General policy re options for obtaining LOTE proficiency  Current version in effect since 2017.
Model Policy	LA USD BUL-4723.4	<a href="https://achieve.lausd.net/cms/lib/CA01000043/Centricity/doctype/main/22/policies/BUL%204723%204%20Final%20Feb%202017.pdf">https://achieve.lausd.net/cms/lib/CA01000043/Centricity/doctype/main/22/policies/BUL%204723%204%20Final%20Feb%202017.pdf</a>	Elaborates on testing options for obtaining LOTE proficiency  Current version in effect since 2017
Link	ACTFL Assessment of Performance Toward Proficiency in Languages	AAPPL Test <a href="https://www.actfl.org/assessment-research-and-development/actfl-assessments/actfl-k-12-assessments/actfl-assessment-performance-toward-proficiency-languages">https://www.actfl.org/assessment-research-and-development/actfl-assessments/actfl-k-12-assessments/actfl-assessment-performance-toward-proficiency-languages</a>  OPT & WPT Test (for less common languages) <a href="https://www.actfl.org/assessment-research-and-development/actfl-assessments/actfl-k-12-assessments/opi-wpt-the-sobl">https://www.actfl.org/assessment-research-and-development/actfl-assessments/actfl-k-12-assessments/opi-wpt-the-sobl</a>	Proposed exams for establishing LOTE proficiency
Guidance Document	ACTFL Guidance Document	<a href="#">Google Doc Link</a>	See page 47 re performance standards for “Heritage Speakers”
UC A-G Guidelines	UC Counselor Quick-Reference:	<a href="https://admission.universityofcalifornia.edu/counselors/files/documents/quick-reference.pdf">https://admission.universityofcalifornia.edu/counselors/files/documents/quick-reference.pdf</a>  See also: <a href="http://www.ucop.edu/agguide/a-g-requirements/e-">http://www.ucop.edu/agguide/a-g-requirements/e-</a>	In addition to courses, UC A-G guidelines provide that certain SAT Subject Examination, AP or IB Examination, or College Courses may satisfy the LOTE requirement for admission to UC A-G schools. However, it appears that the College Board discontinued the SAT Subject Tests.

**Research & Related Resources**  
*· remove in final draft ·*

Type	Title	Link	Notes
		<a href="https://www.cde.ca.gov/ls/eng/index.html">language/index.html</a>  <a href="https://hs-articulation.ucop.edu/guide/adding-subject-requirements/adding-language-other-than-english/">https://hs-articulation.ucop.edu/guide/adding-subject-requirements/adding-language-other-than-english/</a>	<p>Page 12 (top): LOTE Requirements.</p> <p>Page 13-14: LOTE equivalency for students with international academic records AND “Additional methods for demonstrating proficiency in a language other than English.” Bottom of page 14 also contains info re director certification option.</p>
Statute	California Education Code 51225.3	<a href="https://codes.findlaw.com/ca/education-code/edc-sect-51225-3.html">https://codes.findlaw.com/ca/education-code/edc-sect-51225-3.html</a>	<p>Referenced as enabling legislation in applicable LA USD policies, linked above.</p> <p>See section (c), which provides that “The governing board, with the active involvement of parents, administrators, teachers, and pupils, shall adopt alternative means for pupils to complete the prescribed course of study that may include <b>practical demonstration of skills and competencies...</b>”</p> <p>This section may provide some support for the adoption of alternative LOTE equivalency options, such as the one provided in section III of this draft policy.</p>
Regulation	California Code of Regulations § 1632	<a href="https://govt.westlaw.com/calregs/Document/1B7328520FA2C11DE8C6E96BC63A3F6F5?viewType=FullText&amp;originationContext=documenttoc&amp;transitionType=CategoryPageItem&amp;contextData=(sc.Default)">https://govt.westlaw.com/calregs/Document/1B7328520FA2C11DE8C6E96BC63A3F6F5?viewType=FullText&amp;originationContext=documenttoc&amp;transitionType=CategoryPageItem&amp;contextData=(sc.Default)</a>	Policy must include LOTE equivalency option for private school foreign language instruction.
Link	LA USD Policy Index	<a href="https://achieve.lausd.net/Page/181">https://achieve.lausd.net/Page/181</a>	LA USD Policy Index.
Link	California Education Code Index	<a href="https://codes.findlaw.com/ca/education-code/">https://codes.findlaw.com/ca/education-code/</a>	Link to California Education Statutes
Link	California Education Regulations	<a href="https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I836118C0D47E11DEBC02831C6D6C108E&amp;originationContext=documenttoc&amp;transitionType=Default&amp;contextData=(sc.Default)&amp;bhcp=1">https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I836118C0D47E11DEBC02831C6D6C108E&amp;originationContext=documenttoc&amp;transitionType=Default&amp;contextData=(sc.Default)&amp;bhcp=1</a>	Link to index of regulations promulgated by California CDE and other government agencies

