



COLORADO
Department of Education

2025 English Language Learner Count Audit Resource Guide

Submitted to:

Colorado Public School Districts, Charter Schools, Charter School Collaboratives, Charter School Networks, The Charter School Institute (CSI) and Colorado Boards of Cooperative Educational Services (BOCES)

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Effective August 1, 2025



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Disclaimer

When identifying English Learners (ELs) and reporting their English Language Proficiency (ELP) level, districts must follow Colorado’s Standardized Requirements and Procedures for the [Identification](#) and [Redesignation](#) of English learners. For information about Language Instruction Educational Programs (LIEPs) for ELs, please refer to CDE’s [English Language Development \(ELD\) Guidebook](#).

The guidance in this document is not intended to supersede or contradict any program-specific guidance; the intent of this document is to outline documentation requirements that are subject to audit. Further, the documentation provided at the time of audit should be compiled from the district’s already-existing body of evidence (i.e., districts should not be creating new documentation specifically for English Language Learner (ELL) Count audit purposes).

Statutory Authority

[Section 22-54-103, C.R.S.](#), grants the state board authority to “make reasonable rules and regulations necessary for the administration and enforcement” of the Public School Finance Act.

The Rules for the Administration of the Public School Finance Act are published in [1 CCR 301-39](#). These rules further clarify the following:

- (6.03): Pursuant to Section 22-54-103(6.5)(a), C.R.S., funding eligible pupils are considered English Language Learners if they are reported with a Language Proficiency of Non-English Proficient or Limited-English Proficient as of the applicable count date and are within the five-year services window defined in English Language Proficiency Act (ELPA).
- (6.03(1)): Districts must follow the state's standardized identification and redesignation procedures to identify and redesignate English Language Learners and retain documentation showing these procedures have been followed.

Colorado Revised Statutes, www.lexisnexis.com/hottopics/colorado/

Code of Colorado Regulations, www.sos.state.co.us/CCR/Welcome.do

You must open your browser to “[Colorado Legal Resources](#)” before clicking any link to a statutory reference

References

[SB 21-268](#)

[Section 22-54-103, C.R.S.](#)



Data Privacy and Security

As a reminder, local education agencies must use secure means when sending Personally Identifiable Information (PII) to CDE. CDE strongly recommends that districts use a secure method if transferring PII between districts, schools, or with other parties. For example, a secure file sharing tool like Syncplicity, or including the PII in a password protected document.

For more information, please visit the [Data Privacy and Security](http://www.cde.state.co.us/dataprivacyandsecurity) website at <http://www.cde.state.co.us/dataprivacyandsecurity> or contact CDE's [Data Privacy Office](mailto:dataprivacy@cde.state.co.us) at dataprivacy@cde.state.co.us



Introduction and Overview

The purpose of the 2025 edition of the ELL Count Audit Resource Guide (“Guide”) is to provide helpful information to assist districts in preparing for their English Language Learner funding factor count audit. With the emergence of new technological capabilities, it is recommended whenever possible that districts retain their audit documentation in electronic format.

While this Guide has been developed to conform to state statute and the Code of Colorado Regulations (Administrative Rules), this document is not meant to be comprehensive and is not intended to replace state statute or administrative rules.

All references to “district” or “school district” includes the Charter School Institute (CSI), charter schools, charter school collaboratives, charter school networks, and BOCES. Each organization is encouraged to review all relevant sections of the Guide, state statute, and administrative rules.

Throughout this document, the delta Δ symbol has been used to denote sections where language has been altered or clarified.



English Language Learner Funding Factor Count Background

Each year, all public school districts across the state of Colorado and the Charter School Institute participate in the Student October Count data submission to the Colorado Department of Education (CDE). The purpose of this data collection is to obtain required student-level data as provided for by state statute, including information regarding students' funding eligibility as outlined in the Public School Finance Act ([Section 22-54-101 C.R.S.](#)). CDE collects this data through the Data Pipeline, with the Data Services Unit of CDE overseeing the collection.

As part of the School Finance Act, there is an English Language Learner funding factor that is included in the calculated Total Program funding for each district. This funding factor includes additional funding to districts related to the total number of English learners included in the district's funded pupil count for the current year.

Student October Count data is the primary source used to determine which students are included in the district's English Language Learner Count (ELL Count). Students meeting the following criteria as of the pupil enrollment count date and as reported in the Student October Count data submission will be considered for inclusion in the district's ELL Count:

- Grade level: Kindergarten through 12th grade
- Public School Finance Funding Status (i.e., funding code): 80, 82, 85, 91, 92, 94, 95
- Language Proficiency: 1 NEP (Non-English Proficient); 2 LEP (Limited-English Proficient)

Additionally, the EL students meeting the criteria listed above must also be within the five-year funding window defined in the English Language Proficiency Act (ELPA) in order to be included in the ELL Count.

Please note that the English Language Learner Count/funding factor is separate from the categorical per-pupil funding districts received under the English Language Proficiency Act (ELPA). For more information about [ELPA](#), please visit: http://www.cde.state.co.us/cde_english/elpa.



Pupil Enrollment Count Date

The pupil enrollment count date is October 1 of each year, unless that date falls on a Saturday, Sunday, or major religious holiday. If the pupil enrollment count date falls on a Saturday, Sunday, or major religious holiday, the pupil enrollment count date will be the following school day.

The determination of the pupil enrollment count date shall not be affected by a district's decision to not have school on the pupil enrollment count date.

2025 Pupil Enrollment Count Date: Wednesday, October 1, 2025

When reporting English language proficiency within the 2025 Student October Count data submission, the district should report the student's level as of the pupil enrollment count date.

Throughout this Guide, in the event a district or school has been granted an alternative count date, said date should be used wherever "pupil enrollment count date" is referenced.

Annual Audit Review 2025-2026

The audit process for funding eligibility data submitted during 2025 Student October Count data collection, including ELL Count data, has changed. The new process is described in the [Annual Audit Review Guidance document](#) that is available on the School Auditing Office's [English Language Learner Count](#) website. As part of the Annual Audit Review, all districts must complete the [ELL Count Questionnaire](#) (Form AUD-110) and submit it to the School Auditing Office via Synccplicity no later than September 15, 2025.

Districts must retain all required documentation until audited by CDE or until five years from the certification due date (November 10), whichever comes first.

Districts should be prepared to provide all source audit documentation in electronic format at the time of the audit. In most cases, districts should be able to generate and save required reports electronically from their student information system or, if needed, scan hard copy documents and save them in an electronic format.

Never email any documentation containing Personally Identifiable Information (PII) to CDE.

Expanded Audit

In the event a district is selected for an expanded English Language Learner Count audit as described in the Annual Audit Review process, the district will be required to provide student-level documentation (as described in this Guide) to evidence the student's language proficiency of non-English speaking (NEP) or limited-English speaking (LEP) as of the pupil enrollment count date for the reported year. The required audit documentation will vary based on the year in program.

For purposes of the ELL funding factor count, year in program is determined by the student's reported language proficiency within the Student October Count data collection, specifically NEP or LEP. The student's "Year in Program" will increase by one year in each subsequent year in which they are reported as NEP or LEP in Student October.

Audit Documentation Requirements

As part of the Annual Audit Review process, and during any subsequent expanded audit, districts must be prepared to provide district-level (as well as student-level) documentation evidencing language proficiency for a sample of funded students reported as NEP or LEP as of the pupil enrollment count date. The documentation provided at the time of an expanded audit should be compiled from the district's already-existing body of evidence (i.e., districts should not be creating new documentation specifically for ELL Count audit purposes).

Organization-Level Audit Documentation

As part of the Annual Audit Review process, all districts will be required to upload the district's identification and redesignation process documentation (which must align with the Colorado Standardized [Identification](#) and [Redesignation](#) processes), regardless of whether or not they report any students in Student October as NEP or LEP, along with their completed ELL audit questionnaire.

- **District's Identification Process**
 - Documentation describing the district's process for identifying students with an English language proficiency level of NEP or LEP
 - Sample scoring rubric with cut scores or other objective criteria (e.g., ratings, levels, or other measurables) that clearly indicates what conditions must be met for a student's language proficiency level to be designated NEP or LEP
- **District's Redesignation Process**
 - Documentation describing the district's process for redesignating students (with a previously-reported English language proficiency level of NEP or LEP) out of Language Instruction Educational Programs (LIEP).
 - Sample scoring rubric with cut scores or other objective criteria (e.g., ratings, levels, or other measurables) that clearly indicates what conditions must be met for a student to be redesignated out of LIEP.

Note: Districts must ensure their EL identification and redesignation procedures and associated criteria for EL identification and redesignation are documented and that the criteria contain data that clearly demonstrates the rationale for identification or non-redesignation. **At the time of audit, failure to provide documentation which sufficiently demonstrates a student's eligibility for ELL Count funding may result in an audit adjustment.**

Student-Level Audit Documentation

In the event a district is flagged for an expanded audit, it will be required to provide student-level documentation evidencing a language proficiency of NEP or LEP for a sample of students reported in the Student October Count data collection. Applicable student-level documentation will be determined based upon the district's documented Identification and Redesignation processes which must align with Colorado's standardized processes.



Districts should refer to guidance published by the CDE Culturally and Linguistically Diverse Education (CLDE) Office for more details, including but not limited to:

- [Identification & Placement](#) website
 - [Standardized Identification of Multilingual Learners](#) Guidance
- [Redesignation and Exiting Students](#) website
 - [Standardized Redesignation of Multilingual Learners](#) Guidance

Required Documentation

For all sampled students included in an expanded ELL count audit review, the district must provide the following documentation:

- **Detailed district enrollment history**
 - Generated out of the student information system which lists the start and end dates for each enrollment record
- **English Language Proficiency ELP assessment score sheet (PDF only)**
 - WIDA Screener
 - As described in the Standard Identification Process, an **initial placement** test given to potential EL students (i.e., new to K-12 education or transferring into the district) to determine if they qualify for enrollment into an LIEP.
 - Must be dated within 365 days preceding the pupil enrollment count date (i.e., between 10/2/2024 and 10/1/2025)
 - [WIDA Screener for Kindergarten \(Quick Guide\)](#)
 - For students in kindergarten through first-semester 1st grade
 - [WIDA Screener Grades 1-12 \(Quick Guide\)](#)
 - For students in second-semester 1st grade through 12th grade
 - Includes both Paper and Online formats
 - WIDA ACCESS
 - As described in the Standard Redesignation process, a **summative assessment** used to measure a student's progress towards learning academic English.
 - Must be from the most recent test administration year (i.e., the 2025 WIDA ACCESS testing window occurred from January through February 2025*).
 - WIDA ACCESS for Kindergarten
 - WIDA ACCESS for grades 1-12
 - WIDA Alternate ACCESS

***Written Explanation:** For students who are continuously enrolled in a district, continuing in program (i.e., Years 2-5 in Program) and who do not have ELP assessment scores (i.e., WIDA ACCESS) from the most recent test administration year, a written explanation as to why the student did not participate/complete the ELP assessment will be required.



Districts may submit ELP assessment scores (WIDA ACCESS/WIDA Screener) as an official score report issued by WIDA and/or as data submitted in the student cumulative file or score reports from another WIDA state. However, enrolling districts and schools must verify that score reports and records are within the timeframes listed above.

Additional Documentation

- **Identification- Body of Evidence:** For newly identified EL students whose screener scores exceed the state's cut scores for a language proficiency of Non-English (NEP) or Limited-English (LEP), and the district makes the determination to place the student in an LIEP, the district must provide the body of evidence (as described in the district's Identification Process) that supports the student being identified as NEP or LEP and placed in program despite having exceeded the state's cut scores for NEP and LEP.
- **Redesignation- Body of Evidence:** For students whose most recent test administration ELP Assessment scores meet or exceed the state's minimum cut scores for redesignation, the district must provide the body of evidence (as described in the district's Redesignation Process) that supports the student remaining in program despite having met these minimum cut scores.
 - **Reminder:** For enrolling NEP/LEP students who meet the state criteria for redesignation based on an evaluation of the most recent test administration year's ACCESS scores, districts **must** follow the Standardized Redesignation procedures and gather a local BOE (even for newly enrolled students) to confirm the student is no longer NEP/LEP and is eligible for redesignation.