

The Hon. Roberto Rodriguez
Assistant Secretary, Planning, Evaluation and Policy Development
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202

August 29, 2022

Dear Secretary Rodriguez,

We, the organizations signed on to this letter, respectfully and enthusiastically submit the recommended action items set out below, as a follow-up to the National English Learner Roundtable meeting you attended on May 13, 2022. The Department of Education and the Biden Administration have an unprecedented opportunity to improve the education and lives of the nation's 5 million Multilingual Learners, and set forth a transformative Agenda for Multilingual Learners, highlighting the immense assets that Multilingual Learners¹ bring to their learning environment and the significant, lifelong benefits conferred by bilingualism, biliteracy, and biculturalism. We propose immediate steps that the Department can take below to begin such a transformation.

Strategic Priorities: The Department has the opportunity to transform its role in supporting Multilingual Learners as well as shape the national conversation about this student population. We recommend that the Department focus on three strategic priorities:

1. Realize the legislated role of the Office of English Language Acquisition as the Department's and the nation's main resource for policies and technical assistance for all matters relating to Multilingual Learners;
2. Provide foundational funding for Multilingual Learners under Title III of ESSA;
3. Elevate Multilingual Learners and their families within SEAs, LEAs, and schools

While an ambitious agenda will require dedicated time and effort, the Department can take immediate steps to advance this vision.

Immediate priorities:

¹ Throughout this letter, we use Multilingual Learners (MLs) as the preferred, asset-based term, except where we refer to ESSA, where English Learner is used.

- **Reassign administration of the Title III formula grants program to the Office of English Language Acquisition (OELA)** and strengthen federal monitoring of Title III. Years ago, Title III was moved from OELA to the Office of Elementary and Secondary Education (OESE) to provide greater coordination of assessments and accountability between Title I and Title III; however, it has not resulted in the most effective and robust implementation and monitoring of Title III. Instead, Title III should be housed in OELA. Title III is a matter of basic educational need, and as such, it is a program that requires specific expert knowledge and skills, particularly around improving multilingual teaching and learning. States rely on federal technical assistance in crafting and administering their state and local plans under Title III of the ESEA and need timely, accurate, best-in-practice guidance. OELA already disseminates research and resources for teaching Multilingual Learners effectively and has the expertise to provide critical technical assistance to states. If properly resourced to meet staffing needs, OELA would be well positioned to provide needed guidance and ensure Title III program quality through expanded monitoring of states.
 - **This supports priority 1 and requires minimal resources.**

- **Issue guidance on the foundational nature of Title III funding: The purpose of Title III is to help ensure that English Learners (ELs) attain English language proficiency and meet state academic standards, including support for multilingual programs.** The Department should issue guidance clarifying that Title III funding is uniquely targeted to support Multilingual Learners; as such, it should not be treated simply as an adjunct to Title I funding.
 - **This supports priority 2 and requires minimal resources.**

- **Request robust funding for Title III in the next Presidential Budget Request:**

The Biden Administration’s theory of change for K-12 education focuses on significant, and long-needed, increases in funding for Title I and for Special Education/Rehabilitative Services. However, while these increases are desperately needed to support vulnerable student populations, they are not sufficient to meet the specific needs of the nation’s Multilingual Learners. The ML population in the United States grew 35% between the 2000-01 school year [3,793,764] and the 2018-19 school year [5,115,887], making MLs one of the fastest-growing student populations.² However, while the population has steadily increased, Title III funding has not kept up with the growth of MLs. The Department should include a funding request of \$2 billion for Title III in its FY24

² National Center for Education Statistics, Table 204.20, English learner (EL) students enrolled in public elementary and secondary schools, by state: Selected years, fall 2000 through fall 2019 (Washington, DC: National Center for Education Statistics, 2021).

budget request to make a bold and necessary investment in our multilingual learners, thereby investing the nation's security and well-being. The Department should also work with Congress to ensure that Title III funding reaches a key milestone in enacting the level of funding proposed by the President and the House (\$1 billion) in FY23.

- **This supports priority 2 and requires \$2 billion in FY24.**

- **Leverage the National Professional Development (NPD) Grant Program** to address critical needs such as teacher shortages, particularly teachers of Multilingual Learners, asset-based recognition programs such as the Seal of Biliteracy, and culturally and linguistically relevant family outreach, among others. The Department should establish priorities in the NPD program to support:
 - “Grow-your-own” programs, such as those in place in Seattle and Dallas, where LEAs partner with local IHEs to develop innovative curricula and support to expand the teacher training pipeline for teachers of Multilingual Learners;
 - For the next cycle of grants, incentivize districts to develop education programs for teaching preschool - 12th grade with a priority for bilingual teachers.
 - Pilot programs using the Seal of Biliteracy to identify promising bilingual and biliterate students as future teachers, to provide first language proficiency growth support and benchmark assessments toward achieving the seal, and to support them through partnerships between LEAs and IHE Schools of Education;
 - Development of state licensing for teachers of Multilingual Learners, in states without such licenses, through collaboration among LEAs, SEAs, and IHEs;
 - Pilot programs to improve pre-service training for all teachers to teach integrated content and language to support Multilingual Learners in their classrooms.
 - **This supports priority 3, and can be accomplished using current resources.**

- **Advance an accountability system for Multilingual Learners that is effective and coherent.** The system of assessments and accountability must set high expectations, focus on closing gaps, set clear goals for development of English proficiency, identify and focus on subcategories of ELs³ (EL, reclassified fluent

³ We refer here to Title III of ESSA, thus we use ELs.

English proficient - RFEP, long term English Learner - LTEL, newcomers, ELs dually identified for special education) use meaningful and reliable assessments, monitor progress, focus on growth and address the goal of biliteracy. Short term actions the Department can take include :

- In response to the federal flexibility to define ELs by aggregating ELs and RFEPs for accountability, uplift states that disaggregate the data and use the data on current ELs, RFEPs and LTELs to identify current needs and to demonstrate success over time;
 - Highlight state accountability systems that include high expectations and gap closure metrics for subcategories of ELs (EL, RFEP, LTEL, newcomers, dually identified for special education);
 - Publish a review of states' timeline for growth toward English language proficiency as part of their English Language Proficiency indicator in their ESSER State Plan. Include in the review their process for monitoring progress based upon their English language proficiency assessment results, with particular attention to how states are accounting for set-backs in progress due to the pandemic;
 - Support the development of a system, including assessments, for measuring success in biliteracy attainment.
 - **This supports priority 3, and requires minimal resources.**
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- **Early Learning Programs that support Multilingual Learners.** Evidence shows that successful literacy approaches for Multilingual Learners are more effective when based on multilingual literacy approaches rather than on monolingual approaches. Evidence also shows that developing strong oracy and literacy skills in two languages concurrently provides a strong building block for developing literacy skills among multilingual students. The Department can support the dissemination and implementation of evidence-based dual language learning in the following ways:
 - Create a multilingual approach literacy toolkit for multilingual learners in the lower grades.
 - Create professional development opportunities in multilingual literacy approaches for early educators in the early grades funded through a variety of OESE programs.
 - Create a stipend-based training program for families on multilingual approaches for biliteracy development funded through a variety of OESE programs.
 - Develop a social media campaign target parents of young DLLs on the advantages and benefits of bilingualism and biliteracy

- **This supports priority 1 and requires minimal resources**

The undersigned organizations respectfully submit the above recommendations for your consideration, and we hope they are helpful to the Department in identifying actions that can be taken in the short term to strengthen support for Multilingual Learners. We look forward to continuing to work with you also to advance long-term priorities over the course of the Biden administration. Should you have any questions, please contact Amalia Chamorro at achamorro@unidosus.org and Bill Rivers at william.p.rivers@gmail.com.

Sincerely,

American Council on the Teaching of Foreign Languages (ACTFL)
California Association for Bilingual Education (CABE)
Californians Together
Joint National Committee for Languages-National Council for Languages and
International Studies (JNCL-NCLIS)
National Association of English Learner Program Administrators (NAELPA)
National Association for Bilingual Education (NABE)
TESOL International Association
UnidosUS

Cc: Supreet Anand, Deputy Director, Office of English Language Acquisition