TESOL

Teachers of English to Speakers of Other Languages, Inc.

A Global Education Association

November 10, 2009

Lawrence Feinberg
National Assessment Governing Board
800 North Capitol Street, Suite 825
Washington, DC 20002

Dear Mr. Feinberg:

As Executive Director of Teachers of English to Speakers of Other Languages, Inc. (TESOL), a global education association, I am writing to you to offer TESOL's comments on the recommendations of the Technical Advisory Panel on Uniform National Rules for National Assessment of Educational Progress (NAEP) Testing of English Language Learners. TESOL appreciates the opportunity to offer comments on the panel's recommendations, and commends the efforts by the National Assessment Governing Board (NAGB) on this issue.

Incorporated in 1966, TESOL is a global education association for English language teaching professionals headquartered in Alexandria, Virginia, USA. TESOL encompasses a network of nearly 55,000 educators worldwide, consisting of approximately 12,000 individual members and an additional 43,000 educators within the 100-plus TESOL affiliate associations. Representing a multifaceted academic discipline and profession, TESOL offers members a variety of resources on current issues, ideas, and opportunities in the field of English language teaching, including an annual convention regarded as the foremost professional development opportunity for English language educators worldwide.

TESOL commends the efforts by NAGB to address issues of inclusion of English language learners (ELLs) on the NAEP. There are approximately 5.5 million ELLs in U.S. schools, with estimates for that number to double by 2015. As the largest growing subgroup of students in U.S. schools, it is critical that efforts be made now on how best to address the needs of these students throughout the educational system.

Providing an additional challenge for schools is the fact that ELLs represent a broad diversity of languages, cultures, abilities, and educational backgrounds. While the majority of ELLs in U.S. schools are Spanish-speaking and were born in the United States, there are over 100 languages spoken by ELLs throughout the country. In addition, ELLs represent the full range of educational backgrounds: from those who have received a formal education on par with their peers, to those who have either an interrupted education or limited to no formal education. Moreover, states implement a broad array of policies and practices in serving the needs of these students. By attempting to establish uniform national rules for inclusion, NAGB has the opportunity to demonstrate national leadership in this challenging area.

In general, TESOL supports the panel's recommendations for appropriate inclusion of ELLs on the NAEP. TESOL offers additional comments on the specific recommendations below.

1) *ELLs in all states and districts selected for the NAEP sample who have been in United States schools for one year or more be included in the National Assessment. This policy should be implemented with the disaggregated reporting of ELL test results by detailed information on students' English language proficiency and the availability of accommodations that maximize meaningful participation.*

For ELLs in U.S. schools, academic proficiency in English is the foundation upon which their academic success is built. Until they reach full academic proficiency in English, academic success may remain out

1925 Ballenger Avenue, Suite 550, Alexandria, Virginia 22314-6820 USA
Telephone +1 703-836-0774 • 888-547-3369 • Fax +1 703-836-7864 • E-mail info@tesol.org • Web http://www.tesol.org/

of reach for many ELLs, especially when that success is defined by demonstrating achievement on standardized assessments.

In terms of participation in NAEP, length of education in U.S. schools is not automatically a reliable and trustworthy indicator of English language proficiency and, in fact, is often simply an arbitrary figure. However, the recommendation is consistent with current policy under the Elementary and Secondary Education Act, as amended.

The second part of this recommendation—that of disaggregated reporting of ELL test results by detailed information on students' English language proficiency—is the more important piece, and the portion that TESOL fully supports. As the purpose of NAEP is to provide a nationally representative and continuing assessment of what U.S. students know and can do, the language proficiency level of ELLs must be taken into account here, especially since the NAEP is provided in English. Disaggregating and reporting these data will help researchers and assessment experts in getting a clearer picture of the academic progress of these students.

2) *Students should be offered ELL-responsive accommodations that maintain the constructs in the NAEP framework, including items and directions in plain language, side-by-side bilingual Spanish-English test booklets, word-to-word bilingual glossaries without definitions, as well as other accommodations currently allowed by NAEP. The accommodations for each student should be selected at the local level by school personnel who are qualified to make judgments regarding the inclusion of the ELL in NAEP, including knowledge of his or her level of English language proficiency.*

If the meaningful inclusion of ELLs is desired in NAEP, the use of ELL-responsive accommodations is vital. TESOL is pleased to see this among the recommendations of the technical advisory panel and urges NAGB of its adoption. As accommodation practices vary a great deal from state to state, providing a framework and the resources for the accommodations will go a long way to establish some level of consistency in assessment policies for ELLs.

In terms of the specific recommendations for accommodations, the bilingual version of the NAEP tests in Spanish may be of help for the more than 70% of ELLs in the Unites States who are native Spanish speakers. However, sound pedagogical principles dictate that the language of assessment must mach the language of instruction, so a bilingual Spanish test will be useful only for students who are currently in bilingual programs or who have received academic instruction in Spanish. NAGB should consider this when it develops its accommodation guidelines for states and districts.

As the remaining 25–30% of English language learners in the United States speak more than 100 different languages, providing bilingual exams or bilingual glossaries in each of these languages may not be practical. However, TESOL urges NAGB to develop bilingual word-to-word glossaries in languages other than Spanish to assist states and districts with large numbers of other minority-language groups. As U.S. Census data report that Chinese, Korean, and Vietnamese are the most common native languages spoken by ELLs after Spanish, NAGB should consider developing word-to-word bilingual glossaries in these languages as well. If uniformity is the desired aim, than the bilingual glossaries should come from a single source, rather than leaving individual states to develop these on their own.

Lastly, TESOL supports the recommendation that accommodations for each student should be selected at the local level by school personnel who are qualified to make judgments regarding the inclusion of the ELLs in NAEP, including knowledge of his or her level of English language proficiency. TESOL recommends that NAGB provide in its guidelines more specific details to schools and districts as to identifying who these personnel might be, outlining the qualifications. These should include, at a

minimum, ESL and bilingual education instructors, assessment experts, and other school personnel with training and knowledge of second-language acquisition pedagogy and theory.

3) *NAEP results for ELL students should be disaggregated and reported by the best available standardized assessment data on the level of English language proficiency.*

Consistent with the response for the first recommendation above, TESOL supports this recommendation. As stated earlier, academic proficiency in English is the foundation upon which the academic success of ELLs in U.S. schools is built. Therefore, the language proficiency level of an ELL must be taken into account when assessing that student's academic knowledge.

Under the Elementary and Secondary Education Act, as currently amended, the language proficiency level of ELLs is not taken into account in any meaningful way in assessing the academic knowledge of these students. Moreover, the varied data from states makes comparisons very difficult, if not impossible. Providing this information on a national level would provide a clearer and more accurate snapshot of the academic knowledge of ELLs.

In its recommendations, the Technical Advisory Panel also recommended that the National Center for Education Statistics (NCES) collect, disaggregate, and report results for former ELLs who have been reclassified as fluent and English proficient and exited from the ELL category. This would be extremely informative data for policy makers and assessment experts; therefore TESOL supports this recommendation.

4) *To attain comparable participation rates across states and districts, special efforts should be made to inform and solicit the cooperation of state and local officials who decide upon the participation of individual students, including joint planning sessions and targeted information sharing. A high common goal for 95 percent or more of ELL students sampled to participate should be established.*

This particular recommendation from the Technical Advisory Panel is critical for effective implementation of the other recommendations outlined above. One of the major difficulties with the Elementary and Secondary Education Act, as currently amended, is the varied approach to its implementation by states and districts, especially in regard to the assessment of, and accountability for, ELLs. This situation was only exacerbated by the lack of meaningful—and sometimes inconsistent—guidance from the U.S. Department of Education during the first years of that law's implementation.

Adding to this particular situation is the fact that ELLs are unevenly distributed across the country, and reside in many states. While some states have had large populations of ELLs for many years, and thus have years of experience on serving the needs of these students, many other states have relatively new and expanding populations, and have much less institutional knowledge on working with ELLs. By soliciting the cooperation of state and local education leaders, and making special efforts to inform and include them in planning and policy development, NAGB can provide strong leadership in helping to ensure the effective implementation of these guidelines for ELL inclusion.

5) NAEP should adopt an aggressive timeline for innovation and research, including (a) the development of test items written in plain language; (b) a short test of English language proficiency; (c) targeted testing with blocks of items at low and high levels of difficulty; and (d) computerized administration of the assessment when feasible.

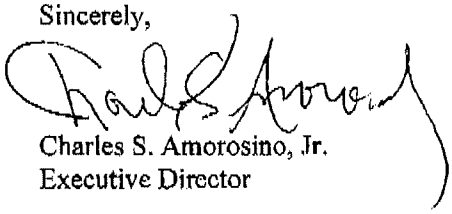
TESOL supports the recommendations by the Technical Advisory Panel for the aggressive timeline for innovation and research on the NAEP. Given the broad variety in both the forms of assessment and the

assessment data coming from states, some of these developments will greatly aid in helping to form a clearer national picture on the academic achievement of English language learners.

Specifically, TESOL urges NAGB to consider two short-term recommendations as high-priority: the development of word-to-word bilingual glossaries, and the immediate study of existing NAEP student background questionnaire data on how teachers rate ELL's speaking, listening, reading, and writing in English as advanced, intermediate, or beginner/low, and the relationship of these ratings to the student's achievement. TESOL also supports the recommendation by the panel to develop a Spanish language literacy test, as this would support bilingual programs and bilingual literacy.

TESOL welcomes the opportunity to be of further assistance to NAGB. If you have any questions regarding TESOL's comments, or need any additional information, please contact John Segota, Director of Advocacy and Professional Relations, at 703-518-2513 or by e-mail at jsegota@tesol.org.

Sincerely,



Charles S. Amorosino, Jr.
Executive Director

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