

Comments to the National Assessment Governing Board

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Los Angeles, California

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My name is Mary Campbell and I am the Administrator of the Language Acquisition Branch of the Los Angeles Unified School District (LAUSD). As the second largest school district in the United States, Los Angeles Unified School District's geographic area is 710 square miles and includes 885 schools and centers. As of September 2009, our Kindergarten -12th Grade student enrollment is 688,132 students. In the Spring 2009, LAUSD reported the following English Learner enrollment information to the California Department of Education:

- English learners constitute 33% of the district's K-12 population
- Ninety-two (92) primary languages were reported for English learners and fluent-English-proficient students. Of these primary languages, eighty-three (83) were reported for English learners
- Spanish-speaking English learners comprised 94% (207,346) of the total English learner enrollment in grades K-12, followed by Korean-speaking English learners at 1.1% (2,384) and Armenian-speaking English learners also at 1.1% (2,382)

Additionally, the NAEP Trial Urban Districts Assessment (TUDA) for 2007 has identified LAUSD as having the highest percentage of English Learners assessed in 4th Grade (47%) and 8th Grade (28%) Reading. This data clearly indicates that LAUSD provides instructional services to a large majority of English Learners in the United States.

On behalf of LAUSD, I acknowledge and appreciate NAEP's commitment to assure that English Language Learner (ELL) samples are fully representative and to maximize

student access and meaningful participation in the assessment. We strongly agree with the need to establish uniformity of NAEP participation rates among states and districts and to make participation rates high and administration procedures uniform.

Thank you for the opportunity to provide comments on the Technical Advisory Panel on Uniform National Rules for NAEP Testing of English Language Learners.

Recommendation 1 (Which ELL Students Are To Be Tested?):

Given that LAUSD has the largest percentage of English Learners assessed in Reading in the TUDA, we strongly agree that “ELLs in all states and districts selected for the NEAP who have been in U.S. schools one year be included in the National Assessment.” We agree “this policy should be implemented with disaggregated reporting of ELL test results by detailed information on students’ English language proficiency and availability of accommodations that maximize meaningful participation.”

Additionally, LAUSD student participation data supports the recommendation that NAEP set a goal of 95 percent participation of the ELL students selected for testing. To illustrate this need, I would like to provide an example of how ELL participation may affect assessment results. The 2007 NEAP Trial Urban Districts Assessment (TUDA) data indicates that 47 percent of ELLs assessed in Reading grade 4 were from LAUSD. Consequentially, the 2007 Average Reading Scale Scores for Grade 4 English learners indicate that LAUSD has the lowest average scale score on the Reading assessment. We find it intriguing that comparable districts, Chicago and New York, have an 18% and 15% ELL participation rate respectively. This data clearly supports the need for uniform participation, which will result in fairer comparisons and information on the progress of English language learners.

As a result of this data analysis, LAUSD applauds the panels incentive for inclusion recommendation that “states and district that do not attain the policy goal of 95 percent participation rate among eligible ELLs selected for the sample should be designated in NAEP reports as jurisdictions failing below the desired participation rates.”

Recommendation 2 (How Are ELL Students To Be Tested?):

LAUSD supports the panel's recommendation that qualified staff at each sampled school select from among ELL-responsive accommodations allowed by NAEP that best meet the linguistic and social-cultural needs of each ELL student taking the assessment. It is imperative that NAEP select appropriate accommodations, which do not alter the construct being measured. We concur that NAEP should provide explicit guidance about the knowledge and skills that local professionals will need to make decisions about including ELLs in NAEP and selecting appropriate accommodations.

Additionally LAUSD agrees with the recommendation that "all NAEP assessments undergo a plain language review and revisions be made to items if needed". We further support the recommendation of convening a group of content specialists, second language acquisition specialists, and language testing experts to complete the aforementioned task.

Recommendation 3 (What Contextual Information Should Be Provided In Reporting ELL Results?):

LAUSD strongly supports the panel's recommendation that results for ELL students should be disaggregated and reported by the best available standardized assessment data on the level of English language proficiency. Additionally, we agree that collecting the student's most recent results on the state's NCLB Title III –required English Language Proficiency Assessment will allow greater consistency in reporting English language proficiency within each jurisdiction.

Recommendation 4 (Interim Guidance To State And Local Officials):

LAUSD fully supports the panel's recommendation that "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." As previously stated, we concur with the panel's incentive for inclusion recommendation.

Recommendation 5 (Recommended Future innovations and Research):

LAUSD supports the panels final recommendation on adopting and 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.

In closing, I appreciate this opportunity to share the LAUSD Language Acquisition Branch perspective on the recommendations made by the Technical Advisory Panel on Uniform National Rules for NAEP Testing of English Language Learners.