

May 25, 2016

Secretary John B. King  
U.S. Department of Education  
400 Maryland Avenue SW, Room 3E231  
Washington, DC 20202  
Re: Comments on non-regulatory guidance for the implementation of ESSA

Dear Dr. King:

On behalf of TESOL International Association (TESOL), a professional association for English language educators, I would like to thank you for the opportunity to provide recommendations to the Department of Education (ED) on areas in which non-regulatory guidance would be most helpful to assist States, districts and other grantees in understanding and implementing the *Every Student Succeeds Act* (ESSA). TESOL represents over 11,000 English language education professionals from the United States and around the world. Thousands of our members in the U.S. teach English Learners (ELs) who are recently arrived immigrants, migrants and refugees.

TESOL International Association is optimistic that ESSA will provide our nation's growing English learner (EL) population with the necessary support and resources required to become proficient English-speakers and high-achieving students. While the new law continues to emphasize the education of ELs, there are still a number of unanswered questions surrounding the law, as well as steps state educational agencies (SEA) and local educational agencies (LEA) can take to ensure that ESSA meets the needs of our nation's underprivileged and often-overlooked students.

### **Expanding Enrollment & Outreach for Early Childhood Education**

As the EL population in the United States continues to grow, so does the number of refugee and immigrant children in need of high-quality early childhood education programs such as Head Start and Early Head Start. SEAs, LEAs, and Head Start grantees should be strongly encouraged to partner with refugee assistance agencies and non-profit organizations at the federal, state and local levels.

A recent report from the Migration Policy Institute (MPI) found that 62% of adult-refugees in the United States spoke little or no English, and were more likely to live in low-income households compared to other immigrant groups. By sharing information and resources between grantees and refugee agencies, the information gap that exists within many refugee communities could be greatly reduced, allowing more families to receive the educational and social services provided

through early childhood education programs. The same report found that when partnerships were made between Head Start grantees and refugee organizations, enrollment of refugee children increased to nearly 9% in the case of programs located in Syracuse, New York, compared to the national average of only 3%.

### **Title III & Title I Funding Interactions**

With the addition of English language development to the Title I accountability system, clarity is needed about the interaction of Title III and Title I funding streams. How can Title III funding be used to help supplement English language instruction efforts under Title I? ED should give clear guidelines and instructions to SEAs and LEAs on how the new funding structures affect English language instruction and accountability for English language development.

Additionally, ED should clarify the consequences of using funding to supplant, not supplement the education of students under Titles I and III. In general, there seems to be a lack of clarity when it comes to the consequences of states who do not follow the regulations set forth in ESSA. Since states have far greater flexibility to set goals and measure accountability, ED needs to issue clear guidance to all stakeholders to ensure that high-levels of achievement are being sought by states.

### **Recruiting and Training New Teachers**

While residency programs funded through Title II of ESSA will increase the number of teachers in our most disadvantaged districts, ED should provide the state and LEAs with best practices for teacher preparation. With the flexibility of LEAs and SEAs to define effective teachers and effective teaching skills, it is important to offer these residency programs guidance on how to best prepare future teachers for careers in underserved schools. These best practices should include a greater emphasis on working directly with ELs and children with special needs to broaden the knowledge and understanding of students with different backgrounds and educational challenges.

Thank you for the opportunity to provide input as the Department begins to draft guidance. TESOL looks forward to working with you and your staff in moving forward with the implementation of ESSA.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rosa Aronson', written in a cursive style.

Rosa Aronson, PhD, CAE  
Executive Director