

25 April 2016

Britt Jung
U.S. Department of Education
400 Maryland Avenue SW, Room 3E231
Washington, DC 20202

Re: Comments on Proposed Rule Changes for Equity/Desegregation Assistance
Centers Docket ID: ED-2016-OESE-0006

Dear Ms. Jung:

On behalf of TESOL International Association (TESOL), a professional association for English language educators, I am writing to comment on the U.S. Department of Education's proposed rule changes governing "Equity Assistance Centers (EACs)," formerly known as "Desegregation Assistance Centers," as set out in the Federal Register, Volume 81, page 15665 (March 24, 2016). 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 seeking a better life in the U.S.

The association has deep concerns with the Department's proposed change to reduce the number of EACs from ten to four EACs. We respectfully urge the Department not to make this change, as it will most certainly impact the effectiveness of desegregation and equity services delivered to the schools they serve, as well as the technical field-work that EACs specialize in.

In response to the Department's question of "Do applicants or program beneficiaries support the proposed flexibility allowing the Secretary to choose the number of regional center?" TESOL is inclined to answer "no." It has been TESOL's experience that EACs serve a critical need for our members, their schools, and their communities when it comes to ensuring English learners (ELs) are provided with an equal education as compared to their non-EL peers. Cutting these centers by 60% will hinder, not support, the nation's responsibility to provide an equal education for ELs and other minority students across the country.

EACs have been instrumental in providing high-quality assistance and trainings on important EL issues, such as curriculum design, instruction, assessments, family engagement and program development. Furthermore, EACs provide ground-level support to teachers, EL families and their children. These services, which include community resource mapping and needs assessments, are most effective when

provided directly to families in the field. The proposed decrease in the number EACs would greatly affect the ability of these centers to assist some of our nation's neediest families and schools.

Under the Department's proposal, each center would absorb new states and more families, resulting in a greater demand for services in each region, as well as many communities being further away geographically, making some services inaccessible to many educators and families. Additionally, the Department's suggestion that these services could still be provided remotely does not take into consideration that many of our poorest schools, communities and families lack the basic technological necessities for these services and programs to be delivered and implemented properly.

As the population of ELs in U.S. schools continues to grow, it becomes apparent that the Department's plan to cut six EACs would do more harm than good for the EL population and other minority students. The proposed cuts to current EACs would only strain an already overloaded system, assigning the responsibility to oversee the equitable education of over 50 million students in over 13,500 school districts to just four EACs across all fifty states and U.S. territories. The regions that current EACs serve were created with various intentions in-mind, as they can develop close relationships with nearby schools and communities, monitor issues close to where they occur, and address any civil rights issues in a timely manner. By cutting more than half of all EACs, which help safeguard a child's equal access to education, the proposed reduction of centers has the potential to obstruct the ability of our most disadvantaged and at-risk students to obtain an equal education, undermining the original purpose of EACs.

Thank you for providing us with the opportunity to comment on the Department's proposal, and we hope the Department takes our opinions into consideration when final regulations are determined.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rosa Aronson', written over a horizontal line.

Rosa Aronson, PhD, CAE
Executive Director