



December 17, 2008

Ms. Suzanne Matula  
Office of English Language Programs, SA-44  
301 4<sup>th</sup> St., SW, Room 304  
Washington, D.C. 20547

**Re:** 73 FR 67920, November 7, 2008: Establishment of an Online English Language Program

Dear Ms. Matula:

As Executive Director of Teachers of English to Speakers of Other Languages, Inc. (TESOL), a global association for English language teaching professionals, I am writing to provide TESOL's comments on the Department of State's Request for Information concerning establishment of an online English language program.

Incorporated in 1966, Teachers of English to Speakers of Other Languages, Inc. (TESOL), is a global association for English language teaching professionals headquartered in Alexandria, Virginia, USA. TESOL encompasses a network of approximately 60,000 educators worldwide, consisting of more than 14,000 individual members and an additional 45,000 educators within the 100 plus TESOL affiliate associations. Representing a multifaceted academic discipline and profession, TESOL offers members serial publications, books, and electronic resources on current issues, ideas, and opportunities in the field of English language teaching. TESOL also conducts a variety of workshops and symposia, including an annual convention, regarded as the foremost professional development opportunity for English language educators worldwide. TESOL's mission is to develop and maintain professional expertise in English language teaching for speakers of other languages worldwide.

While TESOL is not prepared to comment on the specific questions posed in the Federal Register notice, the following concerns are raised for your consideration in regards to this proposed initiative from the Bureau of Educational and Cultural Affairs (ECA):

- *Impact on U.S. intensive English programs* – TESOL includes among its members those who teach and manage intensive English programs (IEPs) across the United States. This sector of the field, which works with post-secondary international students, has experienced significant challenges due to the downturn in international student enrollment in the U.S. in the years since September 11, 2001. While recent reports have indicated international student enrollment is rising, TESOL is concerned that a free, internet-based English language program sponsored by the U.S. government will have a considerable negative impact upon IEPs.

Although the intent of the initiative is to reach economically disadvantaged youth who cannot afford to pay for English language instruction, an internet-based program will be available to all learners who have internet access, including those who have the means to pay

for in-country instruction or to come to the U.S. for language training. The international education community is already anticipating the impact of the global financial crisis in the upcoming academic semesters, and the launch of such an online program will undoubtedly increase that negative impact.

- *Academic content and pedagogy* – While the Federal Register notice states that it is ECA’s intent to partner with the best NGO and academic communities to develop this initiative, it appears from the content of the notice that a great deal of work has been done on this initiative without any consultation with the key organizations and stakeholders in the English language education community. For example, it is stated in the notice that the language learning framework for the initiative will be based on the norms and guidelines of the National Council of State Supervisors for Languages. TESOL, the global association for English language teaching professionals, is well known in the field for developing standards for many areas of English language instruction, including an upcoming set of technology standards. It is unclear why the developers of this initiative have chosen to ignore the expertise of the leading global association for English language education.
- *Existing online learning frameworks* – The timing of this initiative is particularly curious, as the Office of Vocational and Adult Education (OVAE) at the U.S. Department of Education just launched in November an online language learning platform for adult English language learners in the U.S., *USA Learns*. From conversations with the developers of the platform, it is already being accessed by learners from over 100 countries. It appears that the development of a second online language learning platform by ECA would thus be a duplicative effort and a waste of government resources.

Because of these concerns, TESOL advises that ECA *not* move forward until these issues can be fully addressed in consultation with the stakeholder community.

Thank you for your attention to these views. If TESOL can provide you with any additional information, please contact John Segota, Advocacy and Professional Relations Manager, at 703-518-2513 or by e-mail at [jsegota@tesol.org](mailto:jsegota@tesol.org).

Sincerely,



Charles S. Amorosino, Jr.  
Executive Director

CC: Shelley Wong, President  
Mark Algren, President Elect  
Sandy Briggs, Past President