

25 September 2013

Joseph C. Conaty
Acting Director
Office of English Language Acquisition
U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202-6132

RE: Technical Assistance-NCELA RFI Docket ID ED-2013-OELA-0107

Dear Mr. Conaty:

On behalf of TESOL International Association (TESOL), a global education association representing over 12,000 English language educators in more than 150 countries, I am writing to provide the association's comments in response to the Request for Information (RFI) regarding technical assistance under Title III of the Elementary and Secondary Education Act (ESEA), and services of the National Clearinghouse for English Language Acquisition (NCELA).

As you are well aware, English learners (ELs) are the fastest growing segment of the school-age population in the United States. With the continued growth of the EL population, the changes to curriculum and instruction with the implementation of college- and career-ready standards, and the development of the next generation of assessments, the need for a strong and active Office of English Language Acquisition (OELA) is now greater than ever.

The visibility of this office – or the lack thereof – is seen as an indication of the priority of ELs within education policy and the Department of Education. Since 2008, when the administration and oversight of the English Language Acquisition State Grants under Title III was moved to the Office of Student Achievement and School Accountability Programs, OELA has often suffered from lower visibility and a perceived diminished capacity. TESOL is hopeful that the appointment of Dr. Libia (Libi) Gil as the next OELA Director and other recent activity from this office signal a departure from this trend, and that the Department of Education will be providing additional resources so that OELA can fulfill its important role.

Technical Assistance for Title III

On the question of technical assistance for Title III, all of the areas outlined in the RFI are important, and are needed at every level. However, given the growth of the EL population, and the subsequent expansion of resources in the private sector, OELA and the Department of

Education may be better suited to focus their attention at the State Education Agency (SEA) and Local Education Agency (LEA) levels.

While all of the topic areas identified in the RFI are important, TESOL recommends the following be made priorities for OELA and Title III staff:

- Proper identification of ELs
- English Language Proficiency (ELP) Standards
- ELP assessments
- Interpretation of Title III statutory requirements
- College- and career-ready standards and ELs
- Accountability
- Language Instruction Educational Programs (LIEPs), including alignment to college- and career-ready standards
- Collection and use of data
- Professional development and education for teachers and leaders
- ESEA flexibility and ELs
- Early childhood programs and ELs
- ELs at the secondary school level

In addition, TESOL recommends OELA and the Department of Education provide guidance and technical assistance in the area of teacher preparation for working with ELs. As developments continue with the next generation of assessments and implementation of college- and career-ready standards, OELA and the Department should continue their policy roles in providing guidance and regulations.

The other topic areas identified in the RFI are important as well, and provide opportunities for OELA and Title III staff to share their expertise and collaborate with other agencies or organizations in the private sector. Some of the best delivery methods for technical assistance (written guides, Webinars, conferences and meetings, and presentations at national events) lend themselves to collaboration with private sector partners, so the Department is encouraged to explore these options further.

National Clearinghouse for English Language Acquisition (NCELA) Web site

NCELA and its web site are important resources for the field of English language teaching, and TESOL is pleased that the Department is continuing its support of it. However, the continued disputes over NCELA and its administration have been quite unfortunate, and it appears as a result that the clearinghouse is no longer the robust resource it once was.

Of the current information available from NCELA site, the most useful information is the data on the EL population, the Title III State Information System, and the NCELA e-list. In addition, the basic information and resources related to federal programs and grants is helpful. NCELA provides a good venue to disseminate information and data collected from federal grants such as the National Professional Development Program, so TESOL urges OELA and the Department to continue exploring ways to use it for that purpose.

Other areas of the NCELA web site are not as useful, however. While NCELA does report out some data on ELs as collected from school districts, the English Learner Data Clearinghouse would be much more useful if it contained detailed data on the EL population, rather than a simple list of links to other resources. In addition, the Promising Practices section has very little information to be useful. Resources such as the Webinars and the *AccELLerate!* newsletter have been useful, but they have not been kept current and are in danger of becoming obsolete.

Given the growth of the EL population in the United States and the increase in online resources from the private sector (e.g. Colorin Colorado, the Migration Policy Institute's ELL Information Center, the TESOL Resource Center), OELA and the Department of Education should give consideration on how best to position NCELA so as not to unnecessarily replicate resources currently available elsewhere. This is particularly important if there is continued disruption to NCELA's programming and services. Partnerships with other agencies and organizations in the private sector may again provide opportunities to leverage expertise and disseminate additional resources. At a minimum, NCELA should provide links to other, more robust, online resources for educators working with ELs.

Thank you for the opportunity to provide these comments and feedback. It is TESOL's hope that OELA is once again able to provide national leadership on EL issues. TESOL looks forward to the opportunity to collaborate with you and the Department, and to continue its support of OELA's work for ELs and English language teachers.

Sincerely,



Rosa Aronson, PhD, CAE
Executive Director

CC: Deena Boraie, President
Yilin Sun, President-elect
Suzanne Panferov, Past President