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Teachers of English to Speakers of Other Languages, Inc. (TESOL), a global education association representing approximately 12,000 English language educators in 150 countries, appreciates the opportunity to provide its comments on the draft Common Core Standards. With its mission to develop and maintain professional expertise in English language teaching and learning for speakers of other languages worldwide, TESOL and its network of 100 affiliates represent over 45,000 English language educators working at every level worldwide.

As statistics and census figures have shown, English language learners are the fastest growing segment of the school-age population in the United States. There are over 5 million English language learners in U.S. public schools, and according to the last U.S. Census, nearly one in five school-age students in the United States comes from a home where a language other than English is spoken. This heterogeneous population – representing a broad and rich cultural and linguistic diversity – is expected to continue to grow dramatically in the future.

The draft Common Core Standards represent a set of expectations for student knowledge and skills that will result in high school graduates who are prepared for success in college and careers. In order for the Common Core Standards to be successful in preparing all students for college- and career-readiness, the needs of English language learners in the U.S. population must be specifically addressed, especially in regards to successful implementation of the standards, and assessments based on the standards. As the population of English language learners continues to grow in U.S. public schools, education leaders, administrators, and policy makers must understand that successful implementation of the standards for English language learners is the job of all teachers and school personnel. In other words, all teachers must work together in meeting the needs of English language learners – not simply the English as a second language (ESL) and bilingual specialists who often work most closely with these students.

In review of the draft document, TESOL appreciates the special attention provided in the introduction for applying and implementing the Common Core Standards with English language learners. Too often, the needs of English language learners are overlooked, or given consideration after-the-fact. However, it is clear that strong consideration of these issues, as well as research in second language acquisition and best practices, was given in the development of the draft. In particular, TESOL appreciates and supports some of the key points addressed in the introduction, such as discussion on the heterogeneity of the population of English language learners, the strong case that is made for using prior student's knowledge, the points on the need for professional development for teachers and personnel on working with English language learners, and the discussion on language in mathematics for English language learners.

Implementation of Common Core Standards with English Language Learners

Although the introduction provides important information up front on applying the Common Core Standards with English language learners, it alone is insufficient to assure their successful application. Information and explanation on implementing the Common Core Standards with English language learners should be incorporated and interwoven throughout the standards so that all teachers understand their implications for this population. This would include discussion on issues such as background knowledge and native-language literacy, time necessary for development and mastery of skills, and under-schooling in native language, and how these would impact English language learners in their progress towards attaining specific standards.

Additionally, the introduction to the *Common Core Standards for English Language Arts and Literacy in History/Social Studies & Science* states that the standards specifically do not include curricula, materials, or intervention methods to support students. It is further stated that the standards “provide clear signposts along the way to the goal of college and career readiness for all students.” This may be true of native English speakers, as it is clear that this is the main population for whom the standards were developed. However, this critical information is lacking in the standards for the population of English language learners in U.S. public schools.

In order to assure the successful implementation of the Common Core Standards with English language learners, information on methods and pathways to reaching the standards is needed by all educators. While some of this information might be developed separately, the Common Core Standards can and should include: (a) the linguistic demands for each of the content areas to aid all educators working with English language learners, and (b) information on how English language learners at different proficiency levels might equitably attain specific standards. This information is the kind of “clear signposts” needed by all educators working with English language learners on how these students can move along the way to the goal of college and career readiness. English language learners continue to acquire English after leaving specialized ESL or bilingual classes, and thus all teachers must understand that there is shared responsibility for English language learners’ learning, and must understand how to meet these students’ unique needs. Without these components, content-area and general educators will lack the critical information needed to assist the diverse learners in their classrooms, and therefore be at a disadvantage in helping all their students attain the standards.

Assessments of Common Core Standards with English Language Learners

Equally as important to implementation of the Common Core Standard with English language learners is the development of valid and reliable assessments of the standards for English language learners. Under the No Child Left Behind Act of 2001 (NCLB), assessments form the foundation of the accountability system for student performance. Unfortunately, developing and implementing fair and reliable assessments for English language learners aligned to state content standards has been one of the most difficult challenges in recent years.

Any effective accountability system for English language learners must be built on a framework of appropriate, valid, and reliable measures in order to accurately assess student performance. In addition, effective accountability systems must take into consideration the unique needs and characteristics of English language learners, and be focused on measuring individual student performance. Systems built on inappropriate assessment tools or built around the use of singular

tests for high-stakes decisions will undermine, rather than promote, the academic success of English language learners.

In the *Standards for Educational and Psychological Testing* (1999), the Joint Committee of the American Educational Research Association, the American Psychological Association, and the National Council on Measurement in Education outline research-based accepted practices in educational testing. The Joint Committee's Standard 9 (Testing Individuals of Diverse Linguistic Backgrounds) states: "Any test that employs language is, in part, a measure of [test takers'] language skills. This is of particular concern for test takers whose first language is not the language of the test" (p. 91). In short, when English language learners take a mathematics or science test, it is not clear the degree to which the results reflect their knowledge of English rather than their content-area knowledge. The Joint Committee's statement of acceptable practice advocates that when test results are used to make significant decisions, as is the case with NCLB, it is important "to consider the possible use of alternative information-gathering tools (e.g., additional tests, sources of observational information, modified forms of the chosen test) to ensure that the information obtained is adequate to the intended purpose" (p. 94).

With the implementation of the Common Core Standards, new assessments will need to be developed by states to measure achievement. It is critical that these assessments be valid and reliable for use with all students, including English language learners, and this be taken into account during the development of these assessments. In addition, information on valid and reliable assessment procedures for English language learners, including appropriate accommodations be developed and provided to all educators. Moreover, the accountability system for the standards must include multiple forms of measurement for English language learners, including alternative forms of assessment that see improvement over time.

English Language Proficiency Standards

Under NCLB, states are required to develop English Language Proficiency (ELP) standards that are linked and aligned with their Reading/English Language Arts standards for use with their English language learner student population. Adoption by states of the Common Core Standards will therefore necessitate changes and revisions to ELP standards.

To promote effective instruction, ELP standards must be built on this unique construct and focused on supporting the development of academic language. All the skill domains (listening, speaking, reading, and writing) must be included within the standards. In addition, the standards should include clear definitions of the levels of language proficiency that are understood by both teachers and administrators, and a sufficient number of proficiency levels so that progress in language development can be demonstrated. Additionally, ELP standards should be developed and articulated at the same time as other content standards to ensure a strong linkage, and to ensure strong alignment with curriculum development, assessments, and accountability measures.

As English language learners will need to be able to understand the language of discourse in each academic content area, there should be a demonstrable relationship between ELP standards and the academic achievement standards for the core content areas. Specifically, ELP standards should encompass the vocabulary and academic language of all core curriculum content areas and should clearly delineate language development across all proficiency levels in each academic content area. By noting the linguistic demands of each academic content area in the ELP

standards, language development can be assessed in all areas while providing English language learners the academic language needed to access the content of each core subject area.

The development of national ELP standards that are built on the unique construct of English language development, such as TESOL's *PreK-12 English Language Proficiency Standards*, can be used by states as a resource in order to more readily adopt and implement aligned curricula and assessments. Moreover, national ELP standards will help in developing national native language standards, and native language assessments for content standards.

In addressing these important issues, National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO) should pursue partnerships with national organizations such as TESOL with expertise in second language acquisition and English language development.

TESOL appreciates the opportunity to offer its comments on these draft Common Core Standards, and welcomes further opportunities to be a resource to NGA and CCSO.