

NAEP Writing Framework Recommendations

Email: nagb@ed.gov

Subject: Public Comment: FR Doc. 2022–26353, Writing Assessment Framework for the 2030 National Assessment of Educational Progress (NAEP)

Dear Lesley Muldoon, Executive Director, National Assessment Governing Board (NAGB), U.S. Department of Education:

Thank you for the opportunity to provide public comment as part of the National Assessment Governing Board’s review of the 2030 National Assessment of Education Progress (NAEP) Writing Assessment Framework. Our three organizations represent thousands of professionals serving multilingual learners of English (MLEs) and we offer these comments and recommendations for the NAGB’s consideration in support of the 5.1+ million MLEs within the U.S. public education system¹.

Representing Associations

TESOL International Association (www.tesol.org) is the trusted global community for knowledge and expertise in English language teaching with a membership community of over 13,000 English language teachers and other professionals from more than 170 countries. Over 5,000 of these members are U.S.-based, serving the millions of MLEs and their families throughout the education system.

WIDA (www.wida.wisc.edu) WIDA advances academic language development and academic achievement for children and youth who are culturally and linguistically diverse through high quality standards, assessments, research, and professional learning for educators. WIDA, located at the University of Wisconsin—Madison, was created in 2003, when a USED Enhanced Assessment Grant was awarded to the Wisconsin Department of Public Instruction, WIDA’s first home. WIDA’s language proficiency test impacts over 2 million multilingual learners in 41 states and territories.

The Center for Applied Linguistics (CAL) (www.cal.org) is to promote and support language learning and cultural understanding by serving as a trusted source for research, resources, and policy analysis. CAL communicates monthly to a network of over 50,000 educators interested in language and culture policy, research, and practice. Through its professional development, assessment, technical assistance, world language, and research activities annually, CAL has a national impact on students, families, educators, policy makers and researchers addressing language and culture activities and initiatives.

¹ Data compiled by the National Center for Education Statistics reports that in 2019 10.4% of public school students (PK-12), or 5.1 million, were identified as English learners. Source: <https://nces.ed.gov/fastfacts/display.asp?id=96>

Rationale for the Recommendations and Comments

With over 100 years of combined service to the MLE community, our organizations and our members have dedicated their professional and personal service to ensuring that the diversity of MLEs and their families have the resources for success and are elevated for their assets and contributions. Our missions are guided by research and practice across the educational spectrum and demonstrate continuous commitment to the profession, working with families, communities, municipalities, and state and federal agencies, all to advance MLEs.

Our recommendations and comments stem from our histories, advocacy, and vision for the future - all of which are in line with the federal government's commitment² to effectively engage MLEs by strengthening access to and participation in government services, especially the public education system.

Recommendations and Comments

1. **Anchor the assessment writing framework in [universal design for learning \(UDL\)](#) and its three key principles.** Every student should have multiple means of access for 1. engagement, 2. representation, and 3. action and expression (CAST, Inc., 2023). These principles are explained in detail in the [UDL Guidelines](#), which recommend that students have “options to use multiple media for communication”, “use multiple tools for construction and composition”, and “options to promote understanding across multiple languages” (CAST, Inc., 2019).
2. **Secure resources to review assessments written in multiple languages.** According to the U.S. Census Bureau, (2021), over 67 million people living in the U.S. over the age of 5 (approximately 22% of the population) speak a language other than English at home. The number of school-aged children (5-17) in the U.S. who come from multilingual homes is almost 12 million, according to the U.S. Census Bureau (2021) . In addition to students' multiple home languages, students in the U.S. also receive instruction in dual language programs in over 27 languages in the U.S. ([American Councils, 2021](#)) and a variety of bilingual education and English language development programs. According to the [U.S. Department of Education](#) (2019), “Thirty-five states and the District of Columbia reported having a dual language program in the 2016–17 school year (SY).” As multilingual learners are learning in multiple languages and bring diverse linguistic resources to their writing, the NAEP writing framework should match the students' mode of instruction and enable multiple means of expression that include students' rich linguistic resources and language variations. The NAEP framework should:
 - a. approach writing assessment from a multilingual perspective
 - b. have comparable forms in multiple languages

² US Department of Justice memo issued Monday 21st November 2022:
<https://www.justice.gov/file/1553196/download>

3. **Treat multilingual learners and students with disabilities independently as they represent distinctly different groups of students.** Multilingual learners, multilingual learners with disabilities, and students with disabilities are three distinct student populations, each with unique resources (see framework pg. 10) Assessing Students With Special Needs). Embarking on the redesign of the Framework should center on prioritizing characteristics of these groups that can potentially positively impact the results rather than retrofit the existing Framework through accommodations. While accessibility through UDL is to be afforded to all students, the use of accommodations is only a legitimate and valid route for students with Individualized Education Programs (IEPs).

Strong writers use their resources well. All students will benefit from the option to access the assessment with scaffolding, using tools and supports such as:

- a. accessing a reference- a dictionary/thesaurus (English or Multi-lingual)
 - b. using multi-modal means of expression, including images and digital representations
4. **Incorporate opportunities for multilingual learners to access and utilize their rich linguistic and cultural resources during assessment.** For example, cross-linguistic transfer (use of two languages) should be acknowledged in writing for specific purposes, i.e. for fluency and depth of expression, and acknowledgment of how this should be treated in the framework is needed. Linguistic varieties should be included in both prompts and scoring.
 5. **Encourage/Provide inclusive opportunities for multilingual learners and other minoritized students to present perspectives that are representative of their multicultural orientations.** This can be achieved in multiple ways:
 - a. Topics, for example, should draw from universal themes that have wide range applicability across cultures and student experiences.
 - b. Provide choices in prompts to address multiple cultural orientations.
 - c. Have multiple rounds of bias and sensitivity reviews with multiple stakeholders from diverse communities.
 6. **Include diverse stakeholders who bring expert cultural and linguistic representation to the framework design committees.** This should occur throughout the tiered committees to provide diverse and inclusive perspectives representative of the students being assessed.
 7. **Reconsider or redefine the construct of writing from 'quill and ink model' to a 21st century model that includes digital citizenship and multi-modal forms of expression.** Modern communication is increasingly supported by visual and digital content, lower density of text, and non-linear formats, with attention to digital citizenship and multimodal literacy. Consider revisions to the formats and tools utilized in the

framework and writing assessment to match the demands of modern communication in a digital and globally interconnected context.

Additionally, we recommend the following:

- Disaggregate and report data using ESSA reporting categories and show growth of MLEs over time in cohorts.
- Expand professional learning opportunities on the writing framework to include ELD/ESOL/Bilingual/Language teachers.
- Include an assessment for writing in the arts (literary, folk, songs, etc.).
- Specifically assess writing ability using narration, description, classification, and evaluation skills as related to the purposes for written communication: persuasive, experiential, expository, and writing in the arts.

Should you have any questions or need additional information on these recommendations and comments please contact:

For TESOL International Association:

Heidi Faust at hfaust@tesol.org

For WIDA:

Margo Gottlieb at margo.gottlieb@wisc.edu

For The Center for Applied Linguistics:

Joel Gomez at jgomez@cal.org

Thank you for the opportunity to provide input on for the NAEP Writing Framework.

Sincerely,

TESOL International Association

WIDA

The Center for Applied Linguistics

Reference List

- American Councils for International Education, (2021). *ARC Completes National Canvass of Dual Language Immersion Programs in U.S. Public Schools*. Retrieved from: <https://www.americancouncils.org/news/announcements-featured-content/arc-completes-national-canvass-dual-language-immersion-programs>
- CAST, Inc. (2023). *About Universal Design for Learning*. Retrieved from: <https://www.cast.org/impact/universal-design-for-learning-udl>
- CAST, Inc (2019). *The UDL Guidelines*. Retrieved from: https://udlguidelines.cast.org/?lutm_medium=web
- Jamie L. Schissel, Constant Leung & Micheline Chalhoub-Deville (2019) The Construct of Multilingualism in Language Testing, *Language Assessment Quarterly*, 16:4-5, 373-378, DOI: 10.1080/15434303.2019.1680679
<https://www.tandfonline.com/doi/abs/10.1080/15434303.2019.1680679>
- Gottlieb, Margo (2022). How Can Multilingual Learners and Their Teachers Make a Difference in Classroom Assessment? Center for Applied Linguistics. https://www.cal.org/wp-content/uploads/2022/06/CAL-WP-Classroom_Assessment_Gottlieb_2022.pdf
- Gottlieb, Margo (2022). *Assessment in Multiple Languages: A Handbook for School and District Leaders*. Thousand Oaks, CA: Corwin.
- Kinneavy, J. L., *A Theory of Discourse*, Reprinted, Norton, 1980.
- NCTE, Standards for the Assessment of Reading and Writing, Revised Edition, (2009)
<https://ncte.org/resources/standards/standards-for-the-assessment-of-reading-and-writing-revised-edition-2009/>
- Pew Research Center, (2023). *Languages spoken among U.S. immigrants, 2017*. Retrieved from: <https://www.pewresearch.org/hispanic/chart/immigrant-statistical-portrait-languages-spoken-among-u-s-immigrants/>
- U.S. Census Bureau, (2021). *American Community Survey: S1601 Language Spoken At Home*. Retrieved from: <https://data.census.gov/table?q=language&tid=ACSST1Y2021.S1601>
- U.S. Department of Education, (2019). *Dual Language Learning Programs and English Learners*. Retrieved from: https://ncela.ed.gov/files/fast_facts/19-0389_Del4.4_DualLanguagePrograms_122319_508.pdf