To: Montserrat Garibay, Assistant Deputy Secretary and Director for the Office of English Language

Acquisition, Department of Education

From: TESOL International Association

Re: Proposed Priorities, Requirements, and Definitions-National Professional Development Program

Agency/Docket Number: Docket ID ED-2023-OELA-0132

Document Citation:88 FR 63543Document Number:2023-20011Date:16 October 2023

Dear Assistant Deputy Secretary and Director Garibay:

Thank you for the opportunity to provide public comment as part of the Department of Education's Office of English Language Acquisition's review of the proposed priorities, requirements, and definition of the National Professional Development Program. TESOL International Association (TESOL) applauds Office of English Language Acquisition (OELA) in the refreshed National Professional Development (NPD) Program priorities. Like the Department's call to action, "Raise the Bar: Lead the World", TESOL takes pride in advancing English language teaching (ELT) expertise in multilingual contexts worldwide.

We offer these comments with the background and support of a global network of approximately 60,000 educators and 100-plus affiliate associations. We are dedicated to advancing expertise in English language teaching (ELT) professionals who support the millions of English learners (EL) in our public schools, and as such, our comments reflect our 60-year history, advocacy, and vision, all of which align with the Department's goals of Raise the Bar (RTB).

Proposed Priority 1. Increase the Number of Bilingual or Multilingual Teachers Through Pre-Service Programs.

TESOL applauds OELA's emphasis on the recruitment and development of multilingual educators and recognizes the value of ensuring ELs receive instruction from qualified ELT educators and that those educators reflect the diversity of the EL population¹. We further recognize that multilingual educators are a tremendous asset for all students and faculty. For this reason, we recommend that Grow Your Own programs include efforts to recruit bilingual educators in all content areas, not only English language development programs. Moreover, TESOL recognizes that ELs receive support and education from the whole education system, inclusive of the numerous paraprofessionals that provide access to services that extend from the classroom to the families and communities. We recommend that OELA extend priority one to include pathways for educators and paraprofessionals who have accessed training through nontraditional means other than through higher education, such as through community, adult-education, or distance learning, in line with relevant state standards for licensing and certification.

Additionally, we recommend that OELA enhance this priority through the engagement of recipients of the Seal of Biliteracy. Emphasizing the resource that the Seal brings to the RTB, OELA has opportunity to support the Grow Your Own programs that partner professional development, credentialing, and licensure programs with Local Education Agencies in creating a diverse pipeline of educators.

¹ See https://ncela.ed.gov/sites/default/files/2023-06/ELsTeachers-Infographic-20230616-508.pdf

Proposed Priority 2. Service to Low-Income Students.

TESOL has supported underserved communities for many years through our diverse membership, professional offerings and advocacy, including the provision of resources that support the Dream Act (S 365), the American Dream and Promise Act (HR 16), the Dignity Act (HE 3599), Uplifting Immigrant Students Act (HR 3138), as well as legislation that directly aligns to this NPD priority: Reaching English Learners Act (HR 3605) and the SYLLABLE Act (HR 3607).

We recommend that OELA leverage its data sources on the location and socio-economic status of learners throughout the United States, along with the professional development and licensure of educators, not only the EL instructors but also content instructors serving the EL population. Attention should be given through the grant process to enhance the language access and rights of these students and their families, especially in communities with limited resources or experience with ELs, including rural communities.

Proposed Priority 3. Improve In-Service Professional Development Programs Targeting Bilingual or Multilingual Educational Personnel Who Serve English Learners.

An expansive and comprehensive professional development program should uplift all educators within the school system, not solely bilingual or multilingual educational personnel serving ELs.

In addition to extending this priority to educational paraprofessionals and personnel who are not certified or licensed, we recommend that OELA, through proposed priority 3, emphasize the educational context and ecosystem surrounding ELs, which will include content instructors and administrators serving the ELs within their classrooms, schools, and communities. Having an educational environment with a systematic focus on ELs through an asset base lens enhances not only the outcomes of ELs but also uplifts their peers. Professional development programs in this priority should not only target EL educators but all educators, personnel, and paraprofessionals of the school and school systems.

We provide these comments and recommendations in full support of the Department's call to action in Raising the Bar in addressing instructor shortages, training, and development in uplifting English learners. Should you have any questions, wish to discuss, or need additional information regarding these comments, please contact Heidi Faust, Grants, Projects, Partnerships Officer, TESOL International Association, hfaust@tesol.org.

Sincerely,
TESOL International Association