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To: The Pennsylvania State Board of Education

Fr: Deborah Wei, Acting Deputy – Office of Multilingual Curriculum and Programs, School District of Philadelphia

Re: Approved draft proposed changes to Chapter 4 - public comment

The proposed changes to Chapter 4 offer increased levels of academic rigor, which we welcome for our students. We recognize the time, energy and thoughtfulness that have gone in to this proposal.

I am writing today to express concern, however, with the requirement of successful completion of the Keystone Exam in three content areas in order for students to obtain a high school diploma, in particular for English language learners (ELLs).

English language learners may acquire English language skills needed in social situations (known as BICS – Basic Intercommunicative Basic Interpersonal Communication Skills) in a relatively short period of time. These language skills can usually develop within six months to two years after arrival in the U.S. However, this form of language is neither cognitively demanding nor specialized.

Cognitive Academic Language Proficiency (CALP) refers to language skills required for formal academic learning. This includes listening, speaking, reading, and writing about subject area content material. This level of language learning is essential for students to succeed in school and in reviewing the drafts, to successfully access the Keystone exam. Students need time and support to become proficient in the linguistic demands in academic areas. Research has shown that this usually takes from five to seven years and if a child has no prior schooling or has no support in native language development, it may take seven to ten years for ELLs to catch up to their peers.

Academic language acquisition isn't just the understanding of content area vocabulary. It includes skills such as comparing, classifying, synthesizing, evaluating, and inferring. Academic language tasks are context reduced. Information is read from a textbook or presented by the teacher. As a student gets older the context of academic tasks becomes more and more reduced. The language also becomes more cognitively demanding. New ideas, concepts and language are presented to the students at the same time. An ELL student who has entered the

United States as a young adolescent cannot be expected to be able to handle the academic linguistic load embedded in the Keystone exams.

The State of Pennsylvania is a WIDA state. The World-Class Instructional Design and Assessment WIDA Consortium (WIDA) is an educational consortium of state departments of education. Currently, 31 US states participate in the WIDA consortium. WIDA designs and implements proficiency standards and assessment for grade K-12 students who are English language learners, as well as a set of proficiency standards and assessments for Spanish language learners.

As a WIDA state, Pennsylvania has adopted English Language Proficiency Standards (ELPS), which outline English language proficiency level descriptors and student expectations for ELLs. The Pennsylvania Department of Education has been very pro-active in adopting ELP Standards that outline what students should know and be able to do in terms of English within core academic areas. The PA ELPS also utilizes the Can-Do descriptors from WIDA which articulate very clearly what students are able to do according to their English Language Development level.

Chapter 4 currently addresses Special Education students' unique needs by allowing students to receive diplomas if they meet the their IEP goals. English language learners require the same support in Chapter 4 in order to ensure that they are not penalized for their English Language Development level.

We are urging the Board of Education to amend Chapter 4 in order to allow English language learners to receive a high school diploma if they show adequate progress according to the ACCESS test that all ELLs in the state are given each spring, and if they successfully complete an academic program aligned to the PA ELPS. Our ELLs work hard to acquire English and many go on to higher education and contribute greatly to the state. Their opportunities for success will be severely hindered if they are unable to obtain a high school diploma.

Please do not fail to contact me should you have any questions.