



Tom Torlakson
State Superintendent of Public Instruction and Director of Education
California Department of Education
1430 N Street, Suite 5602
Sacramento, CA 95814-5901

May 10, 2018

Dear State Superintendent Torlakson:

We appreciate the opportunity to provide public written comments about California's waiver request "to maintain the current calculation that includes reclassified students as long-term ELs."

We believe this will negatively impact English learners (ELs). Grouping reclassified students as long-term ELs, rather than reporting them as separate categories, will lead to an inaccurate understanding of the academic performances and needs of ELs. This inaccurate understanding will lead to policies that do not address the specific challenges ELs face. It is important to include both reclassified ELs and long-term ELs in your accountability system to capture a better understanding of both sub-groups of students and they should be reported as two separate EL student subgroups, not as the same one.

This is critically important for ELs generally and our Southeast Asian American EL students. Over 1 in 5 students (22.4% in FY2014-15) in the state of California are English language learners (ELLs). 3% of ELLs in California identify as speaking a Southeast Asian language (Hmong and Vietnamese), second only to students who identify as speaking Spanish. Two of the top 10 languages spoken by English language learners in California are Southeast Asian languages, Vietnamese and Hmong.

SEARAC recommends:

1. The creation of two additional public reporting categories of ELs to provide better insight into whether schools adequately support English language learners. These two categories include:
 - a. *Former English Language learners* who have been reclassified within the last two academic school years and
 - b. *Long-term English language learners* who have not exited English learner status within the state's five-year goal for English language learner reclassification.
2. Decrease the five-year goal for English language learner reclassification to three years.



These recommendations are supported by CA's EL reclassification rate of 32.8% for SY2013-14 from the Consolidated State Performance Report for 2013-14, which reflects an approximate average of three years across all schools for the reclassification of ELs. Setting the state goal at five years is a significant shift towards decreasing the standards below what CA schools are already achieving in EL reclassification. Additionally, the ability to observe the academic outcomes of former English learners is an informal accountability check to ensure that students are not prematurely exiting English language learner status.

We believe implementing these recommendations will help ELs achieve English language proficiency rather than grouping together reclassified ELs with long-term ELs.

We hope you and the US Department of Education consider these recommendations as your waiver request is reviewed. We hope to work with you on this issue moving forward. Please contact us with questions and concerns.

Sincerely,

Quyen Dinh
Executive Director
Southeast Asia Resource Action Center (SEARAC)