

EXHIBIT G

**Maria Paxson
Response to Expert Declaration
of Dr. Tamara Sniad**

Introduction

I have been asked to respond to the expert report provided by Dr. Tamara Sniad entitled “Educational Program Designs and Practices for English Learners’ Academic Achievement.” I am currently employed at the Delaware Department of Education as the Education Associate for Title III and English learners. My work over the past 15 years has been focused on supporting English learners. During this time I have worked as a dually-certified elementary teacher and an English learner specialist in Delaware public schools. Following my tenure as a teacher I began working at the Delaware Department of Education as the English Learner Field Agent. In this role I provided direct supports to districts and charters across the state on meeting the needs of English learners. This work was multi-faceted and included designing ongoing professional learning for educators of English learners. In my current role, as Education Associate for English Learners, I oversee all programs, supports and compliance for English learners in Delaware.

My educational background includes a Bachelors of Science in Elementary Teacher Education from University of Delaware and a Masters of Education in ESOL Literacy from Wilmington University. Furthermore, I have worked as an adjunct instructor for Wilmington University in the area of Assessment for English learners. I have presented both locally and nationally on topics including English learner instruction, assessment, accountability and program design.

Overview

As the English learner population continues to grow in Delaware, so too have the programs, supports and guidance provided by the Delaware Department of Education. It is my opinion that the State of Delaware has not only advanced English learner education but is a leader nationally in many aspects of program design. The ACLU’s counsel has made incorrect assumptions in their letter to this expert. While Dr. Tamara Sniad opines that the “programming and resources provided to Delaware public schools serving EL students fail to implement policies, structures and research-based practices necessary to provide them with an adequate education.” This is simply not true. This report will outline the varied

ways that the Delaware Department of Education has implemented guidance, supports and high-yield structures that have resulted in increased educational outcomes for Delaware’s English learners.

Response to List of Assumptions in ACLU’s Letter

1. *In Delaware, language learning is generally separated from content-area instruction for English learners.*
 - This assumption is not accurate. This generalized assumption could not be proven without a full analysis and observation of Delaware public schools and classrooms. While all curricular decisions and approaches that fall within state regulations for EL students are a local decision, the Delaware Department of Education has provided guidance to support districts/charters to implement high-quality instructional programs for English learners.
 - Language learning in Delaware is infused across all content-areas. Delaware was a founding member of the WIDA Consortium and an integral part of the development of the original WIDA English language development (ELD) standards (<https://wida.wisc.edu/teach/standards/eld>). According to the WIDA Consortium website, “The WIDA ELD Standards work along with content standards to ensure students engage in the learning of the content standards as they continue to develop English.” This has been a focus of all professional learning, training and resources at the Delaware Department of Education since I began in 2015.
 - English learner educators should be teaching the language of the content with a strong focus on language functions and structures, while content-area educators should be teaching the content with a focus on the disciplinary language functions needed for mastery. This model of language development has been trained upon and shared through various models within Delaware. The Delaware Design for High-Quality English Learner Education, herein called the “Delaware Design,” highlights the asset-based approach that requires shared ownership for all students in Delaware. Specifically, this guidance document is grounded in Delaware’s Guiding Principles with one overarching principle:

All educators share the responsibility for high-quality grade-level instruction that will prepare English learners to succeed in college, career, and life.

1. **Asset-based and Culturally Relevant:** All educators design culturally and linguistically responsive learning environments that draw on student language and cultural assets.
 2. **Rigorous Grade-Level Opportunities to Learn:** All educators integrate language and literacy development within all disciplines.
 3. **Assessment for Learning:** All educators use a variety of measures to continuously refine and adjust instruction to meet Delaware’s Content and Language Standards.
 4. **Building Learners’ Autonomy:** All educators provide scaffolded learning activities to build student autonomy
- The Delaware Design for High-Quality English Learner Education outlines the use of “integrated” and “targeted” English language development (ELD). As outlined in the plan, “the term Integrated English Language Development (ELD) refers to ELD that occurs throughout the day and across the disciplines. It is the foundation of all learning for English learners and is therefore a shared responsibility and priority for all educators in every district, every school, and every learning environment.” “The term Targeted English Language Development (ELD) refers to ELD that amplifies how language works and builds learners’ ability to use sophisticated written and spoken English to participate fully and independently in academic settings. It builds on Integrated ELD and occurs throughout the day and across the disciplines in every learning environment.”
 - The section of the Delaware Design titled “Standards-Aligned Instruction” explicitly states, “A high-quality education is anchored in the Guiding Principles and standards-aligned instruction. Instruction for ELs is aligned to the teaching and learning expectations reflected in both the Common Core Academic Standards and the ELD Standards (WIDA). ELs must develop conceptual knowledge in a subject area, engage in subject-specific analytical practices, and gain proficiency-related

language uses simultaneously. This means that instruction in English language development is not separate from content learning.”

- In the Delaware data system districts/charters select one primary “service model” or “instruction type.” This type is only one portion of the language supports provided to English learners. All guidance and training provided by the Delaware Department of Education support that English learners must be provided language development across all content. Delaware districts/charters have the local control to make program design decisions provided that they align with regulation. It is my opinion that this data is not exhaustive of all supports provided to English learners in Delaware schools.
 - Delaware’s Title III Consolidated Grant Application, in accordance with Title III law, requires districts to respond to how they are supporting both access to content instruction and English language development for English learners. In the 2020 application from the Red Clay Consolidated School District, the district with the largest English learner population, it indicates that in the majority of their schools, students are being provided with Sheltered English Instruction and/or push-in support. In the 2020 Christina School District application it states, “Curriculum and instruction for the EL Program is aligned to the WIDA ELD Standards to address social and instructional language as well as the language of math, ELA, science, and social studies. The EL Curriculum is also aligned with the CCSS and the skills and strategies that are being taught in the content areas.”
2. *English learners in Delaware have limited access to disciplinary literacy (shared ways of reading, writing, thinking and reasoning within academic fields).*
- Delaware has made this an explicit area of focus in professional learning across the state. Teachers and leaders, including district/charter English learner coordinators have engaged in professional learning around ways to increase disciplinary literacy across academic fields. The Delaware Design outlines this as a priority. A review of professional learning materials and Power Points from this session will show that the Delaware Department of Education is providing

on-going professional learning in this area. This work has been shared at a national level.

3. *Many English learners in Delaware are removed from lessons led by their general education content teachers for 1-3 hours per week for classes devoted to learning English.*
 - There does not appear to be any information that would support this is an accurate statement. I do not believe this to be factual.
 - While there are students in Delaware receiving “ESL pull-out,” this does not mean that the students are “removed” from lessons led by their general education content teachers. Any removal for a specialized support is done during times where students are not missing any core instruction. Delaware’s English Learner Guidebook (<https://www.doe.k12.de.us/site/handlers/filedownload.ashx?moduleinstanceid=5113&dataid=22703&FileName=2019-2020%20Delaware%20Department%20of%20Education%20EL%20GUIDEBOOK.pdf>) states “Schools should determine the recommended contact hours based on the student’s overall language proficiency level and program model. Suggested time dedicated to English Language Development is listed below, however, this may vary depending on the program model.”
4. *Most English learners in Delaware receive three hours or less each week with a certified Teacher of English learners.*
 - Delaware does not have any data to support that this is an accurate assumption. I believe this to be an inaccurate statement.
 - The Delaware Department of Education does not collect data regarding the instructional time each student spends with a certified Teacher of English Learners. Delaware districts and charters have the local control to implement programs and approaches that meet their local context so long as the program meets all federal and state laws or regulations.

5. *Many Districts provide English learner services through uncertified paraprofessionals, rather than certified teacher of English learners.*

- Delaware does not have any data to support that this is an accurate assumption. I believe this to be an inaccurate statement.
- The Delaware Department of Education has shared with all district/charter English Learner Coordinators the January 7, 2015 “Dear Colleague” letter (<https://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf>). This letter explicitly states that “Paraprofessionals, aides, or tutors may not take the place of qualified teachers and may be used only as an interim measure while the school district hires, trains, or otherwise secures enough qualified teachers to serve its EL students. And if a school district uses paraprofessionals to provide language assistance services to EL students that supplement those provided by qualified teachers, it may do so only if the paraprofessional is trained to provide services to EL students and instructs under the direct supervision of a qualified teacher.” This letter is also directly linked in Delaware’s English Learner Guidebook and in Delaware’s English Learner Coordinator Schoology Group.
- I believe that all paraprofessionals working with Delaware English learners are working under the direct supervision of a certified teacher of English learners and/or providing additional instructional support.

6. *Most general education content teachers in Delaware have no training or certification in teaching English learners.*

- The number of teachers certified as Teachers of English Learners has shown continuous growth. In the 17-18 school year Delaware reported having 191 teachers holding the Teachers of English Learner certificate. In the 18-19 school year Delaware reported having 297 teachers with the same certificate (SD_0149980_DEPUBCTRL00079433). This demonstrates an increase of over 55% in just one year.
- As outlined in the professional learning section of this report, there are many training opportunities offered by the Delaware Department of

Education to support general education content teachers in meeting the needs of English learners.

- Delaware districts and charters also provide additional trainings and workshops on providing supports for English learners in the general education classroom. As part of the Consolidated Monitoring process, districts/charters receiving Title III funds must provide evidence that they are providing training to mainstream educators on supporting English learners.

7. *Professional development offered by Delaware regarding the teaching of English learners is generally in the form of isolated workshops.*

- This assumption is not accurate.
- The State of Delaware adopted professional learning standards in 2012. This formal adoption has been done in Delaware Regulation 1598(<https://regulations.delaware.gov/AdminCode/title14/1500/1598.shtml>). Among other things, Regulation 1598 states that “The primary goals for professional learning are changes in educator practice and increases in student learning. The process occurs over time and requires support for implementation to embed the new learning into practices.”
- Since I began working for the Delaware Department of Education in 2015, there have been varied professional learning opportunities that are on-going and job-embedded. Below is a sampling of some of the professional learning experiences provided by the Delaware Department of Education.
 - *2015-2016*: On-site supports for districts identified as needing improvement under Title III. Ongoing training and support plans developed in coordination with district leadership. Additionally, all districts under improvement received a three-part series of professional learning series.
 - *2016-2017*: On-site supports for districts identified as needing improvement under Title III continued. Ongoing training and support plans were implemented with district leadership. Improvement districts participated in professional learning and opportunities were expanded to allow for additional participation.

Two six week online moderated courses were provided. The course topics were “RTI for English Learners” and “Math for English Learners.”

- *2017-2018:* The Department of Education began the English Learner Lead Team. This was a unique professional learning opportunity for individuals that showed leadership and a strong commitment to improving educational outcomes for English learners in Delaware. Participants engaged in a four day train-the-trainer series exploring best practices for supporting equitable access to rigorous content for English learners and increasing their skill set for working with colleagues to provide turn-around professional learning.
- *2018-2019:* The English Learner Lead Team was expanded to include a northern and southern cohort. Additional online opportunities for professional learning were launched including a hybrid book-study.
- *2019-2020:* Large scale professional learning series “Improving Instructional Practices to Support Delaware’s English Learners: A Professional Learning Community Series” was launched. This series engaged teams from across the state in the high-yield practices that support and enhance English learner achievement based in the Delaware Design. The series included professional learning for instructional staff, mainstream educators and English learner specialists as well as administrators. Each group completed focused application tasks in between learning sessions. Additional online modules were created to support continued learning and application.

The Delaware Department of Education hosted a five-day Sheltered Instruction Observation Protocol (SIOP) training of trainers. This series was attended by district leaders and teacher leaders. Additionally, Department staff content leads attended the training to allow for continuity of application across content areas. A model SIOP school program was launched. The Department of Education team provided monthly training sessions in the model schools.

Administrative teams conducted walkthroughs with Department staff and were provided coaching on key look-fors and best-practices.

- In the 2015-2016 school year, the Delaware Department of Education held a Common Ground for the Common Core 3.0. This series was designed to support the implementation of the Common Core State Standards by building capacity through a network of carefully selected Guiding Teams from Delaware’s schools. Two particular strands of this initiative were “Targeted Approaches for Closing the Achievement Gap” and “Deepening Literacy Practices Across the Disciplines.” Additional information for this series is available at <https://www.doe.k12.de.us/cms/lib/DE01922744/Centricity/Domain/374/Common%20Ground%203.0%20Flyer-MOU.pdf>
- From 2016 through 2020 the Delaware Department of Education has provided opportunities for districts/charters to apply for additional funds to support professional learning through the Reimagining Professional Learning Grants. The Reimagining Professional Learning Grants support the work of schools committed to improving the quality and efficacy of professional learning for teachers in Delaware in order to increase opportunities and outcomes for our students. In the 2019-2020 school year the Reimagining Professional Learning Grant program was expanded by approximately \$2 million using School Improvement funds with an explicit focus to improve outcomes for those schools identified as TSI-1 and TSI-2 for specific subgroups. Additional information surrounding these grants can be found at <https://www.doe.k12.de.us/Page/2974>.
- The Delaware Department of Education provides an annual English Learner Summer Institute in coordination with the University of Delaware. This is a five-day course that can be taken either for credit or free of charge as a part of the certification pathway for Teachers of English Learners.
- The Delaware Department of Education provides various asynchronous and synchronous online learning opportunities for all educators. Using Schoology as a platform, the Department offers the following courses:
 - Best Practices for Administrators in Supporting English Learners.

- Best Practices for Counselors in Supporting English Learners
 - Special Education Considerations for English Learners
 - Supporting English Learners and Literacy Development in Elementary Classrooms
 - Supporting English Learners and Literacy Development in Secondary Classrooms
 - Supporting English Learners with Significant Interrupted Education
 - Delaware school districts and charters have also made significant investments in on-going professional learning around English learners.
8. *Delaware does not require integrated professional development on working with English learners as part of all on-going professional development programs.*
- Delaware does not require content area specific professional development in general.
 - Delaware requires all educators complete 90 clock-hours of professional development every 5 years for re-licensure.
9. *In Delaware, general education content area teachers are not required to have taken any teacher preparation programs that include specific training for working with English learners.*
- General education teachers hold a content certification in Delaware. Content certificates do not have specific course requirements. Content certificates require that educators obtain the appropriate degree from an accredited institution.
 - The University of Delaware, a major education program feeding into Delaware schools requires a 3-credit hour course on teaching English learners for all candidates in their Elementary Teacher Education program.
10. *Most school leaders in Delaware, including school district English learner coordinators and school principals, are not required to have training or a background in working with English learners.*
- Delaware school leaders are offered various professional learning experiences to further understand best practices for working with English learners.
 - The Delaware Department of Education provides monthly half-day English Learner Coordinator meetings during the school year. These sessions focus

on program implementation, leadership of English learner programs and instructional shifts necessary to improve educational outcomes for English learners.

- Wilmington University educates a great majority of school leaders in Delaware. One of the required courses in their programs is titled, “Education, Ethics and the Law.” According to their website this course includes topics of bilingual education and working with diverse populations. (<https://www.wilmu.edu/courses/courseDescriptions.aspx?subCode=MED&courseNum=6490>)
- Delaware State University has launched a program entitled “Dual-Title MA TESOL/ Bilingual Education and M.Ed. in Educational Leadership. (<https://chess.desu.edu/departments/education/dual-title-ma-tesolbilingual-education-med-educational-leadership>)

11. *Delaware does not provide guidelines or policies for school districts for serving culturally and linguistically diverse students.*

- This assumption is not accurate.
- The Delaware Department of Education has provided the Delaware English Learner Guidebook. The Delaware Department of Education has provided the Delaware Design. The Delaware Design contains a specific section entitled “Culturally and Linguistically Responsive-Sustaining Education.” As stated in this section, “Culturally and linguistically responsive-sustaining education is an active evolving journey that Delaware schools undertake to cross philosophical barriers towards thoughtful and reflective school change.”

12. *Delaware does not provide guidelines or policies for school districts for collaboration between content teachers and English language teachers.*

- Delaware provides guidelines for collaboration between content teachers and English language teachers as well as other specialists.
- The Delaware English Learner Guidebook, Appendix E contains an “English Language Acquisition Plan.” As stated in the Guidebook, “The purpose of this plan is to create a document that will help ensure collaboration among

EL teachers/coordinators and mainstream teachers with a goal of English language proficiency and academic success for each individual English Learner.”

- The Delaware English Learner Guidebook also contains a “English Language Service Discussion for English Learners with Disabilities Form” in Appendix G. The Guidebook states, “Delaware’s *English Learner Service Discussion for English Learners with Disabilities* form should be completed annually for all dually-identified students. This form should be completed by an EL teacher or designee that has knowledge of a student’s language needs. The form should be a collaborative planning between special educators, EL specialists, and additional team members in order to best meet the linguistic needs of the student.”

13. *Families enrolling children in Delaware schools are provided a home language survey to complete. If a language other than English is used in the home, Delaware schools initiate a screening protocol, which may lead to an English placement test.*

- All Delaware districts and charters must include the state standardized Home Language Survey in their enrollment packets.
- A standardized records review process takes place for any student who indicates a language other than English on the Home Language Survey.
- Districts and charters administer the standardized screening tools (WIDA MODEL, WIDA Screener or Alternate Identification Protocol).

14. *Even with the home language survey, many English learners are not appropriately identified as needing English learner services.*

- This statement is inaccurate. Delaware does not have any data to support that students are not being appropriately identified as needing English learner services. Conversely, the Department of Education has data to support that this process has yielded the incorrect identification or over-identification of English learners. Parents/guardians of English learners are notified annually of their student’s English learners status, program placement and other required indicators. As a result of these notifications parents reach out to districts and/or the state requesting removal from

program. These parents often feel that their student has been misidentified. It was realized that in some cases, parents did not realize the purpose of the Home Language Survey. This resulted in the parent completed the survey with a second language when the student was attempting to learn a language other than English or had minimal exposure to another language. A process by which students who do not have another language in the home are removed from English learner status was developed and the Delaware Department of Education maintain parent letters indicating that their student was misidentified.

- The Home Language Survey does not identify students as an English learner.
- The Home Language Survey is intended to provide a way to “flag” students for further review.

15. *Delaware generally uses the WIDA screening test to determine English learners placement in an English learner program.*

- Delaware districts and charters follow the state standardized entrance criteria that has been approved in Delaware’s State ESSA plan. This includes the administration of either the WIDA MODEL, WIDA Screener or Delaware Alternate Identification Protocol. (*Delaware consolidated state plan under the Every Student Succeeds Act. (SD_0152609-SD_0152767).*)

16. *The language proficiency of English learners is assessed annually using a single standardized test.*

- All English learners are required to participate in an annual standardized assessment of English language proficiency, ACCESS for ELLs 2.0.
- Educators across Delaware use various methods of formal and informal assessments to assess the language proficiency of their students throughout the school year.

17. *English learners participate in the ACCESS exam annually until they achieve a score that results in their exiting the English learning program.*

- This assumption is accurate.

18. *The English learner population is anticipated to continue growing in Delaware.*

- Data supports that this assumption is accurate.

19. *Many first-year content teachers have English learners in their classrooms.*

- While 71% of all first year teachers have at least one English learner in their classrooms (compared to 68% of non-first year teachers), only 4.0% of all students in first year teachers' classes (unduplicated count) are EL students, compared to 3.9% for non-first year teachers.
- While many first year teachers have English learners in their classrooms, that percentage is not much different from non-first year teachers (71% vs. 68%). Similarly, when one looks at the number of students in their classes, one can conclude that the difference is very minimal (4% vs. 3.9%).

Rebuttal of Expert Report

Dr. Sniad focuses her report on four main areas; program design, teacher training and qualifications, school culture and assessment and monitoring. While much of Dr. Sniad's report is directly in-line with the most current research on English learners, it is based on many incorrect assumptions about the State of Delaware. It is my opinion that Delaware is already implementing many of the research-based practices that Dr. Sniad outlines in her report.

Program Design

Dr. Sniad opines that "Delaware could improve EL outcomes, Delaware programs by adding more on-going, consistent and deliberate integration of language and content instruction." The report outlines the importance of grounding program design in a "language-as-right" and "language-as-resource" perspectives. Delaware has clear examples of guidance that has been outlined and provided to all districts and charters that demonstrate that Delaware programs are structured in this asset-based framework designed to increase consistent and deliberate integration of language and content instruction. A few examples include:

- Guiding Principles outlined in the Delaware Design
- SIOP Model School Program
- Delaware's English Learner Strategic Plan
- EL Coordinator Meeting Presentations

Dr. Sniad offers three suggestions for improvements in this area within her report.

- (1) “Expanding the offering of two-way dual language immersion programs in areas that have large populations of speaking of Spanish, Arabic, or another language group, as has been done in Texas.”
- (2) “Expanding the offering of Sheltered English Instruction.”
- (3) “Enabling schools, with necessary resources and guidelines, to arrange ELs’ schedules so that they spend the majority of their instructional time with teachers who have specialized training to teach English and content together...”

Dr. Sniad’s suggestions for improvement fail to recognize the current state of English learner education in Delaware.

Since the inception of Delaware’s World Language Immersion program in 2011, the program has continued to be pushed with Delaware districts and charters as the most effective program model for English learners. As a result, each year these programs have been expanded and many programs have moved from a one-way immersion model to a two-way immersion model. The table below shows the growth of the immersion programs across Delaware.

	Total Schools	Total Chinese	Total Spanish	One-Way Enrollment	Two-Way Enrollment	Two-Way Staffing
2012-13	3	1	2	0	2	N/A
2013-14	10	4	6	2	4	N/A
2014-15	10	4	7	3	4	N/A
2015-16	15	5	11	6	5	4
2016-17	22	5	18	10	8	7
2017-18	31	7	25	12	13	14
2018-19	40	10	31	17	15	17
2019-20	43	11	33	17	16	17

In this chart, “Two-Way Enrollment” identifies schools where student enrollment in the immersion program is made up of 30%+ ELs. “Two-Way Staffing” identifies schools where

the English partner is expected to hold or be actively pursuing certification as a Teacher of English Learners.

While only Spanish and Chinese Dual Language Immersion programs currently exist in Delaware, Delaware regulation does not preclude the implementation of an immersion program in any language. The Delaware Department of Education would support the implementation of additional language programs should the population exist. In the guidance document created by the Delaware Department of Education entitled, "Two-Way Spanish Immersion Programs: Delaware Program Expectations," program identification is outlined as "Student enrollment / population as close to a 50/50 balance as possible between Spanish- dominant and English-dominant students to serve as language models for each other (at least one third, but no more than two thirds, of the students in the immersion classroom are Spanish speakers)."

Under the current definition of a two-way immersion program, the only language group that may have sufficient numbers of native speakers would be Haitian-Creole, a language not commonly used for instruction. The closest instructional language that could be provided would be French. In fall 2015, the Delaware Department of Education Immersion team was asked explore the possibility of offering immersion in other languages and make a recommendation on which language to offer if expansion occurred. French was identified as the most appropriate language to add. The findings of this exploration are included in the report "Why French in Delaware." Additionally, beginning with the application for Cohort 6 of the World Language Expansion Initiative (application released fall of 2016), districts were given the opportunity to choose French as an immersion language. The Delaware Department of Education provided this same opportunity for Cohort 7 and Cohort 8 as well. To date, no districts/charters have chosen to implement a French immersion program.

Even where the EL population does not reach the formal definition for a Two-Way Immersion program, districts and schools are encouraged to actively promote the immersion program to families of Spanish-speaking ELs and enroll them in the program. This provides these students with the opportunity to maintain and strengthen their home language and receive other benefits that immersion instruction offers to students.

Delaware has expanded the use of Sheltered English Instruction across the state. While districts and charters in Delaware were previously accustomed to providing ESL pull-out services as the primary instruction type for English learners, schools across the state have been provided training, technical assistance and support to increase the amount of time students are receiving high-quality supports in the classroom. A review of Delaware's instruction types indicates that from 2017 to 2019 the percent of English learners enrolled in an ESL pull-out model decreased from 53% to 33%. In June, 2019, the Delaware Department of Education contracted with Pearson to provide a 5-day training-of-trainers in the Sheltered Instruction Observation Protocol (SIOP). This training has allowed for district and charter leads to become trainers in their own schools. Additionally, the Delaware Department of Education worked intensively with five schools across the state to provide on-going, job-embedded professional learning to all staff on the SIOP model.

Dr. Sniad recommends that Delaware should enable schools to create schedules supporting the placement of English learners in classrooms where the teacher has received "specialized training to teach English and content together." As has been outlined in this report, Delaware continues to provide a wide range of professional learning, across content areas to ensure that all educators are equipped to support English learners in their classrooms. Districts and charters are encouraged to appropriately place students in classrooms where the most appropriate supports are provided to meet individual student needs. The Delaware Department of Education has supported schools with this specific task in the form of on-site visits.

Sufficiently Trained Teachers

As has been outlined in previous sections of this report, the Delaware Department of Education has provided extensive professional learning opportunities to districts and charters on best practices for supporting English learners in the classroom. Additionally, the number of teachers certified as Teachers of English learners demonstrated an increase of 55% in the last year alone.

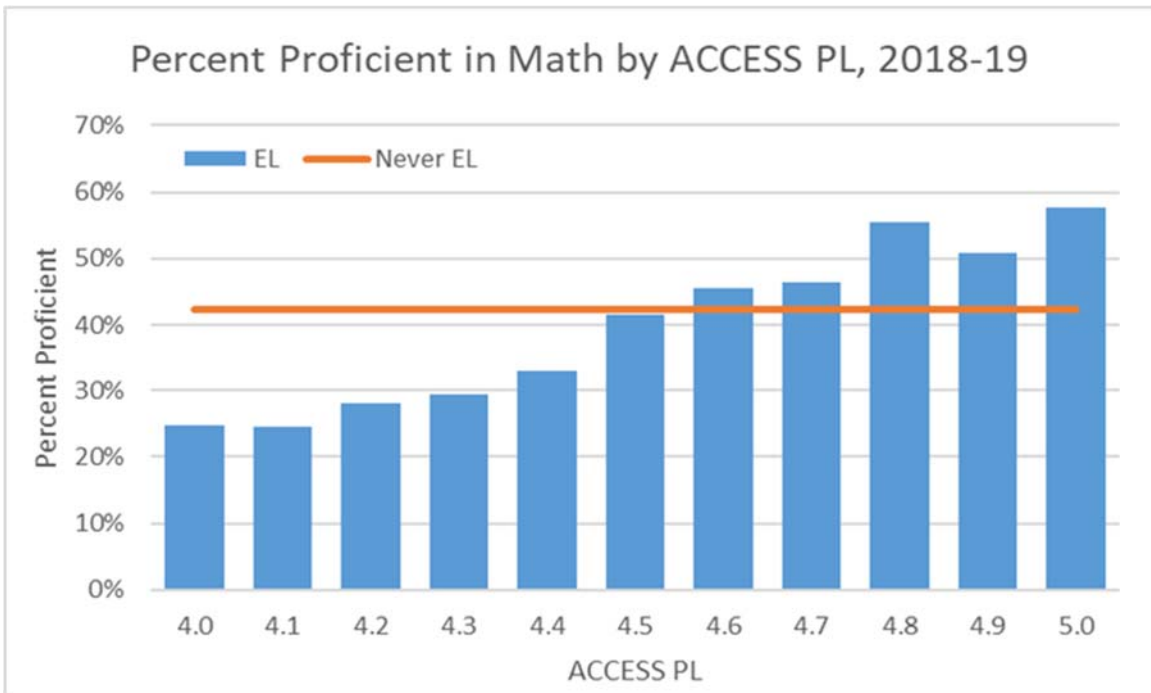
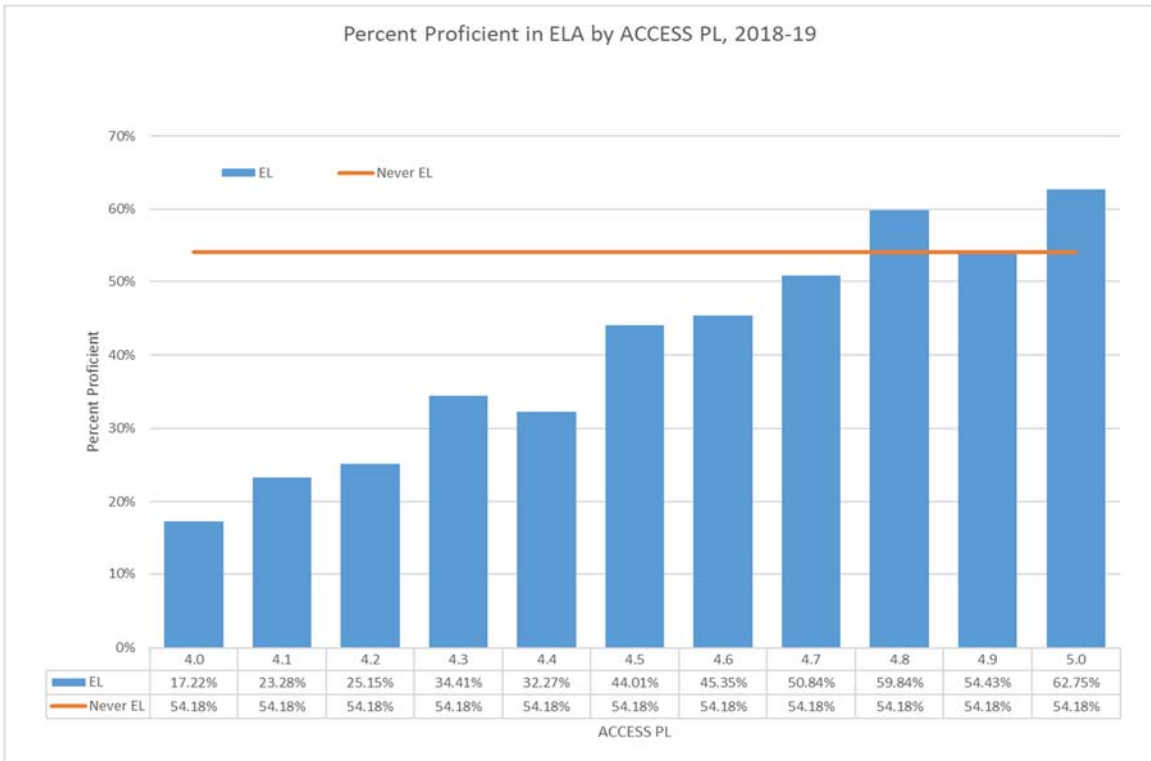
Dr. Sniad attempts to make a connection between English learner student performance on the Delaware System of Student Assessment (DeSSA) and the lack of access to sufficiently trained educators for the same population. This argument is flawed. The Every Student Succeeds Act (ESSA) of 2015, Title VII, Section 8101 defines the term "English Learner" (EL)

as an individual whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual the ability to meet the challenging State academic standards, the ability to successfully achieve in classrooms where the language of instruction is English; or the opportunity to participate fully in society. (ESSA Title VII, Part A, Section 8101 (20)(D).) As a result, several assumptions can be made:

(1) A meaningful relationship exists between English language proficiency and academic content assessments,

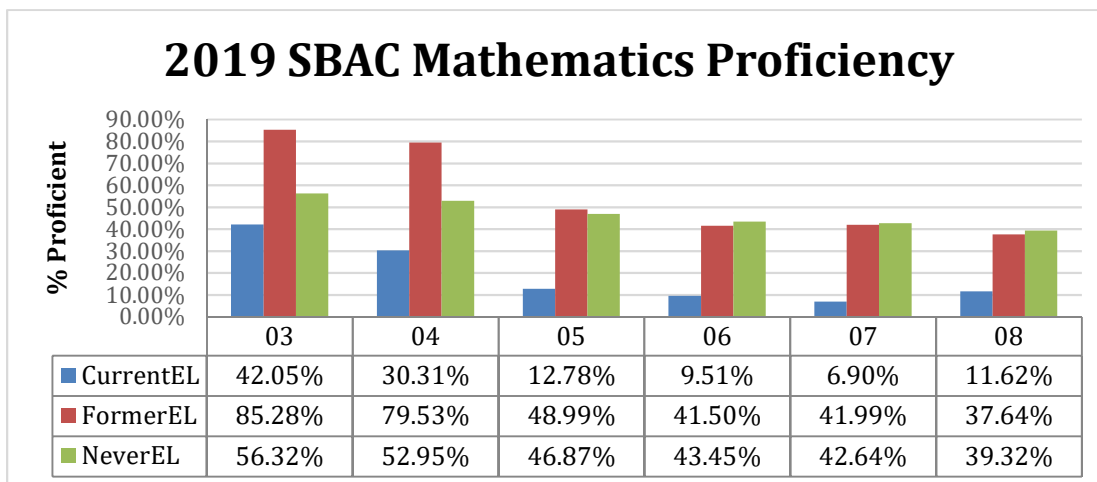
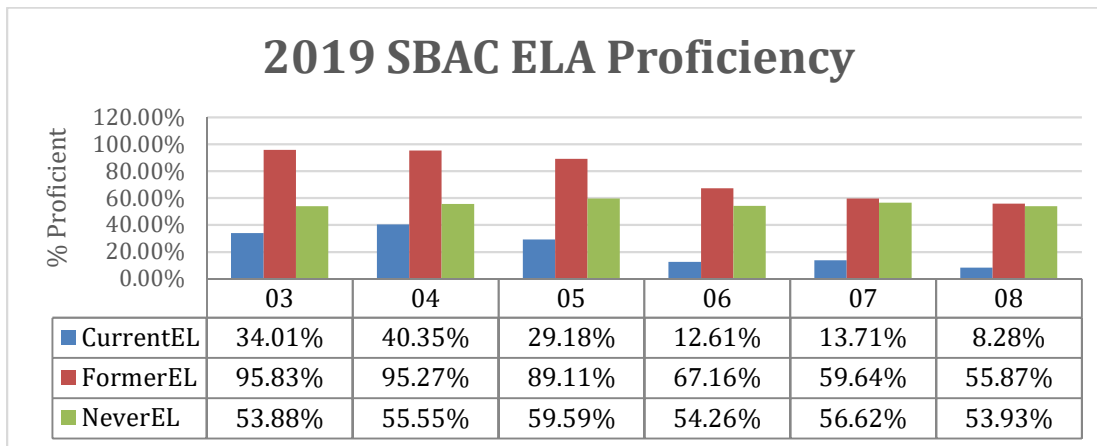
(2) The signal of English proficiency is at the point in which a majority of English learners perform on the state academic content assessment similar to their non-EL peers.

The Delaware Department of Education has used these assumptions to help set our own measure of “proficient” on the ACCESS for ELs assessment. The ACCESS assessment measures English learner progress toward English proficiency. Currently, Delaware defines readiness to exit an EL program as scoring a 5.0 on a 6 point scale. This is nationally one of the higher scores for readiness, with scores ranging from 4.0-5.0. A review of Delaware English learner performance on statewide content assessments demonstrated that there is a clear correlation between language proficiency level (ACCESS) and content area performance on statewide standardized assessments. The graph labeled “Percent Proficient in ELA by ACCESS PL, 2018-2019,” shows that 54.18% of never-English learners in 2018 and 2019 combined demonstrated proficiency on the statewide content assessment. While 50.84% of English learners with a composite proficiency level of 4.7 on the ACCESS assessment were proficient on the statewide content assessment, this number increases at a 4.8 composite to 59.84%. English learners in Delaware with higher levels of English proficiency are scoring as well as or better than their never English learner peers. This same trend can be seen in the graph demonstrating proficiency on the mathematics statewide content assessment.



Current research calls out the flawed approach to using “achievement gaps” to measure English learner success. This unique subgroup is a revolving population that by the nature

of its definition will not remain identified in the subgroup once they have acquired a sufficient level of English. The same research suggests that educators making decisions perform a review of former English learners' success. The two graphs below demonstrate Delaware's former English learners and their success. On the English Language Arts assessment in 2019, former English learners outperformed their non-English learner peers. In 2019 on the Mathematics assessment, former English learners either outperformed or performed similar to their non-English learner peers. These metrics demonstrate the success of English learner programs.



Dr. Sniad also attempts to assert that English learner students in secondary schools have less access to qualified teachers. This assertion is based on full counts of staff and students. These numbers do not account for the fact that there are fewer English learner students in the secondary school settings. According to Delaware ACCESS test data from the 2018-2019 school year, 9,784 of the 13,652 active English learners tested were in grades Kindergarten through five. This distribution of English learners suggests that many English learners are

successfully transitioning out of English learner status prior to middle and high school. Many of the students who are active English learners in secondary school are recent arrivals and/or newcomers. These numbers provide further explanation as to the distribution of certified educators.

The Delaware Department of Education continues to support increasing the numbers of educators with either a certificate as Teacher of English Learners or Bilingual Teacher. Both of these certificate programs are part of “Delaware’s Critical Need Reimbursement Program” (<https://www.doe.k12.de.us/Page/1060>). These two certificates are also part of the “High Needs Educator Student Loan Payment Program” (<https://www.doe.k12.de.us/Page/3846>).

While not every educator is going to pursue a full certification in teaching English learners, Delaware recognizes the importance of providing all educators with professional training on meeting the needs of ELs. It is my belief that there are ample professional learning opportunities for all educator groups to receive support, professional learning and training on research-based practices for ELs. These opportunities are provided in a variety of formats to allow each educator to access the information in a manner that best fits their professional situation.

Conclusion

The Delaware Department of Education provides guidance, technical assistance and professional learning to districts and charters across the state on meeting the needs of English learners. English learner education continues to advance across the state through an asset-based mindset grounded in Delaware’s Guiding Principles. As a result of the ongoing guidance Delaware’s English learners have continued to demonstrate increased educational outcomes.

Signed,



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