HEADQUARTERS
Raul Yzaguirre Building
1126 16th Street NW, Suite 600
Washington, DC 20036-4845

📞 202.785.1670
📠 202.776.1792

🌐 unidosus.org

November 30, 2020

Director of the Strategic Collections and Clearance Governance and Strategy Division
U.S. Department of Education
400 Maryland Avenue, SW
LBJ, Room 6W208B
Washington, DC 20202-8240

Re: Comments to the U.S. Department of Education Regarding the New Information Collection for the Implementation Evaluation of the Title III National Professional Development Program, Docket ID number ED-2020-SCC-0158

Submitted electronically via: http://regulations.gov

To Whom It May Concern:

Thank you for the opportunity to comment on the U.S. Department of Education's proposed information collection for the implementation evaluation of the Title III National Professional Development (NPD) Program. UnidosUS, previously known as NCLR (National Council of La Raza), is the nation's largest Hispanic civil rights and advocacy organization. Through its unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges the social, economic, and political barriers at the national and local levels. For more than 50 years, UnidosUS has united communities and different groups seeking common ground through collaboration, and that share a desire to make our country stronger.

As a leading advocate on education policy encompassing the perspectives of Latinos and English learners (ELs), UnidosUS has a long and significant history working toward equity in education including the reauthorization of the Every Student Succeeds Act and the Higher Education Act. UnidosUS respectfully submits these comments in response to the proposed information collection posted in the *Federal Register* on October 1, 2020. We thank the Department of Education (ED) for the effort to evaluate how institutions of higher education, state education agencies, and school districts that receive funding through Title III's NPD program are implementing projects to help educational personnel working with ELs meet high professional standards and improve classroom instruction.

There are approximately 5 million ELs enrolled in public schools throughout the country—a population that is rapidly growing in several states and already makes up more than 10% of the student population in 11 states.[1] Within the population of EL students, 14% (718,400) also qualify for special education services.[2] These students are commonly referred to as "dual-identified," and they are entitled to receive supports for both English language acquisition and

learning with a disability. Demand for teachers with the knowledge and skills to support ELs' English proficiency, mastery of academic content, and social and emotional health is also on the rise—creating teacher shortages nationwide.

It is critical that ELs have access to high-quality teachers who are prepared and certified to teach students learning English and, given the current COVID-19 pandemic, who are prepared to provide virtual instruction. But even before the pandemic, a report by the U.S. Department of Education found that districts were less likely to report providing professional development for digital learning resources for instructing ELs, compared to providing professional development for instructing general education students.[3] The study also showed that teachers who worked with ELs were more apt to use general digital resources rather than tools designed specifically for ELs. Amid school closures, it is vital that educators understand how to adapt online learning resources to make them accessible to ELs. Otherwise, the opportunity gaps existing prior to the pandemic could be exacerbated. At the same time, a Government Accountability Office study found that the research base on which instructional practices work for EL students was cited by institutions of higher education (IHEs) as a challenge to improving their instruction of EL educators.[4]

Further research and development on effective instructional practices and professional development for teachers of EL students is needed, and the federal government should be collecting data to determine what works. While the grantee and participant surveys will help provide information to inform the policies and practices for high-quality EL instruction, we propose the following changes to the survey instruments to help strengthen the data that are collected.

Proposed Changes to Grantee Survey

Section A: Partners and Participants
- Survey question A4 asks, "Which, if any, types of partners have participated in the following types of activities to support the implementation of your NPD grant?" We suggest adding the following option, "Developing content and professional development that is culturally relevant and responsive to students." Research shows that instructional materials and assignments that reflect students' backgrounds and experiences are critical to engagement and meaningful learning. Other promising studies evaluating the effectiveness of culturally responsive teaching interventions link this approach to a wide range of positive outcomes such as academic achievement and persistence.[5]
- Survey question A8 asks, "Which, if any, of the following strategies has your NPD project used to recruit participants?" We suggest adding the following option, "Are there specific strategies being used to recruit individuals underrepresented in the teaching workforce?" Data show that the teaching workforce is overwhelmingly White and

female, and this has fueled efforts across states and districts to diversity the teaching workforce. While the question asks about outreach strategies, it does not ask grantees to comment on specific outreach strategies that they may be deploying in order to diversify the teaching workforce.

Section B: Project Goals and Content
- Survey question B1 asks, "Which of the following have been primary goals for your NPD project?" We recommend adding the following option, "Increasing the pool of teachers dually certified to teach English learners and students with disabilities." As stated previously, there is wide overlap between students who qualify for special education services as well as English language services—dual-identified students should have access to teachers who have a solid understanding of how culture, language, and disability intersect. Pre-service preparation should provide teachers with an opportunity to be dually certified, and in-service professional development should provide ongoing training.
- We also suggest adding as an option, "Preparing in-service teachers to improve parent and family engagement," as we know that this is a critical piece for student success. A parent's involvement in their child's education is key to the child's success in school, as an engaged parent has valuable knowledge that's useful when making important decisions about their child's school life.
- Survey question B2 asks, "Have your NPD project's professional learning activities included a focus on the following topics?" We suggest adding, "Strategies for integrating technology into the instruction of ELs," particularly as the COVID-19 pandemic has forced schools to shut down and turn to virtual learning. Pre-service teachers should receive instruction on how best to use virtual platforms for instruction, and how to embed high-quality online curricular resources into instruction for ELs.

Section C: Teacher Preparation Activities
- Survey question C2 asks, "Through what type of program(s) has your NPD project coursework been provided? For each type of program involved in your NPD project, please indicate whether the program has been provided in-person, online, or in a hybrid format (i.e., a mix of in-person and online coursework)." We suggest adding an option that would be inclusive of Grow Your Own programs and/or alternative baccalaureate models to the list. There has been a rise in Grow Your Own programs that can help diversify the teacher workforce and fill teacher shortages in bilingual education.[6] These programs focus on recruiting and preparing teachers from the local community, and often provide a pathway for para-educators and other individuals who work in the school but do not have a bachelor's degree or teacher certificate.[7]

- Survey question C5 asks, "Who has delivered the coursework provided through your NPD grant?" We recommend that option "e" be changed to, "consultants, trainers, or instructional coaches who are not affiliated with an SEA or school district," adding a separate option that asks about consultants or other entities not affiliated with an SEA or school district and whether they are nonprofit or for-profit. According to the Bill & Melinda Gates Foundation report *Teachers Know Best: Teachers' Views on Professional Development*, there is a fragmented market of providers, where independent consultants are the most common external providers of professional development.[8] And external providers who are not working as an ongoing consultant to the school or district will likely not technically be able to provide professional development that meets the characteristics of high-quality professional development.[9]

Section D: Professional Development Activities
- Survey question D4 asks, "Who has delivered the professional development provided through your NPD grant?" We recommend that option "e" be changed to, "consultants, trainers, or instructional coaches who are not affiliated with an SEA or school district," adding a separate option that asks about consultants or other entities not affiliated with an SEA or school district and whether they are nonprofit or for-profit.

Section G: Project Evaluation
- Survey question G1 asks, "Which of the types of data about project outcomes has your NPD project collected or does it plan to collect?" We suggest adding as an option, "Participants' employer perceptions of the participant (e.g., based on survey, interview, or focus group data)," as a way to evaluate program outcomes.

Proposed Changes to Participant Survey

Section B: Pre-Service Teacher Experiences
- Survey question B4 asks, "As part of your preparation program for initial certification, how often did you…?" We suggest adding as an option, "Use translanguaging practices that leverage EL students' full linguistic repertoire while addressing core content and language development standards," as a teaching strategy. Pre-service teachers should receive instruction on how to create classroom environments for EL students' multilingual identities and knowledge to be leveraged.
- We also suggest adding as an option, "Support EL students' social and emotional development and overall well-being (e.g., student-centered instruction)," as we know that these are critical teaching strategies for student success.
- Survey question B5 asks, "How useful have your preparation experiences for these teaching strategies been for your classroom instruction?" We suggest adding as an

option, "Use translanguaging practices that leverage EL students' full linguistic repertoire while addressing core content and language development standards."
- We also suggest adding as an option, "Support EL students' social and emotional development and overall well-being (e.g., student-centered instruction)," as we know that this is a critical teaching strategy for student success.

Section C: In-Service Educator Experiences
- Survey question C4 asks, "As part of your NPD-supported professional learning activities, how often did you...?" We suggest adding as an option, "Use translanguaging practices that leverage EL students' full linguistic repertoire while addressing core content and language development standards."
- We also suggest adding as an option, "Support EL students' social and emotional development and overall well-being (e.g., student-centered instruction)," as we know that this is a critical teaching strategy for student success.
- Survey question C5 asks, "How useful have your experiences with these teaching strategies during your NPD-supported professional learning activities been for your classroom instruction?" We suggest adding as an option, "Use translanguaging practices that leverage EL students' full linguistic repertoire while addressing core content and language development standards."
- We also suggest adding as an option, "Support EL students' social and emotional development and overall well-being (e.g., student-centered instruction)," as we know that this is a critical teaching strategy for student success.

<u>Other Feedback on Evaluation</u>

The grantee and participant surveys will surely provide meaningful information about the implementation of NPD grants, but it would also be useful to collect feedback from participants' employers/supervisors (e.g., principals) and from parents of ELs being served by the participants. While participant surveys will provide meaningful information, there could be reluctance and/or inability by participants to rate their own knowledge/skills accurately. Therefore, we think that more valid survey results would be collected from participants' supervisors (principals), as they would be able to provide a different or more objective perspective on participants' knowledge and skills.

We also recommend that the participant survey instrument offer a space for participants to provide additional feedback that is not reflected in any of the survey questions. The grantee survey includes "Section H. Share Your Thoughts," which includes three open-ended questions. A similar section should be included in the participant survey.

UnidosUS is available to discuss these comments in greater detail if you have questions or concerns. We look forward to continuing to engage with the Department of Education on ways to strengthen the quality of instruction that English learners are receiving in classrooms (virtual or in-person) throughout the country. Should you have any questions regarding these comments, please contact Roxanne Garza at rgarza@unidosus.org.

Sincerely,
Roxanne Garza, Education Policy Advisor
UnidosUS

[1] U.S. Department of Education, National Center for Education Statistics, "The Condition of Education: English Language Learners in Public Schools," https://nces.ed.gov/programs/coe/indicator_cgf.asp (accessed November 24, 2020), Figure 1.

[2] Ibid., Table 204.27.

[3] Annette M. Zehler et al., *Supporting English Learners through Technology: What Districts and Teachers Say about Digital Learning Resources for English Learners*, Volume 1: Final Report. U.S. Department of Education, Office of Planning, Evaluation and Policy Development, Policy and Program Studies Service. Washington, DC, 2019, https://www2.ed.gov/rschstat/eval/title-iii/180414.pdf (accessed November 24, 2020).

[4] U.S. Government Accountability Office, *Teacher Preparation: Multiple Federal Education Offices Support Teacher Preparation for Instructing Students with Disabilities and English Language Learners, but Systematic Departmentwide Coordination Could Enhance This Assistance*. GAO report to the Chairman, Subcommittee on Higher Education, Lifelong Learning, and Competitiveness, Committee on Education and Labor, House of Representatives. Washington, DC, 2009, https://www.gao.gov/assets/300/294197.pdf (accessed November 24, 2020).

[5] Jenny Muñiz, *Culturally Responsive Teaching: A 50-State Survey of Teaching Standards* (Washington, DC: New America, 2019), https://d1y8sb8igg2f8e.cloudfront.net/documents/Culturally_Responsive_Teaching_2019-03-28_130012.pdf (accessed November 25, 2020).

[6] Amaya Garcia and Roxanne Garza, *Profile: Chicago's Bilingual Teacher Residency Program*
 (Washington, DC: New America, 2019), https://www.newamerica.org/education-policy/reports/paving-way-latinx-teachers/profile-chicagos-bilingual-teacher-residency-program/ (accessed November 25, 2020).

[7] Amaya Garcia, *Grow Your Own Teachers: A 50-State Scan of Policies and Programs* (Washington, DC: New America, 2020), https://www.newamerica.org/education-policy/reports/grow-your-own-teachers/findings (accessed November 24, 2020).

[8] Bill & Melinda Gates Foundation, *Teachers Know Best: Making Data Work for Teachers and Students*, (Washington, DC: Bill & Melinda Gates Foundation, 2015), http://k12education.gatesfoundation.org/resource/teachers-know-best-making-data-work-for-teachers-and-students-2/ (accessed November 24, 2020).

[9] Professional development should be focused on a skill or competency shown by high-quality research to improve (or be likely to improve) student engagement and/or outcomes, the duration of learning opportunity is sufficiently sustained over time (research shows minimum of 14–50 hours), opportunities for "active learning" including a cycle of inquiry (plan-implement-study-revise), opportunities for collaboration with colleagues, and opportunities for feedback on practice from an expert/coach. Melissa Tooley and Kaylan Connally, *No Panacea: Diagnosing What Ails Teacher Professional Development Before Reaching for Remedie*s (Washington, DC: New America, 2020), https://d1y8sb8igg2f8e.cloudfront.net/documents/NA_NoPanaceaPaper7.7.pdf (accessed November 24, 2020).