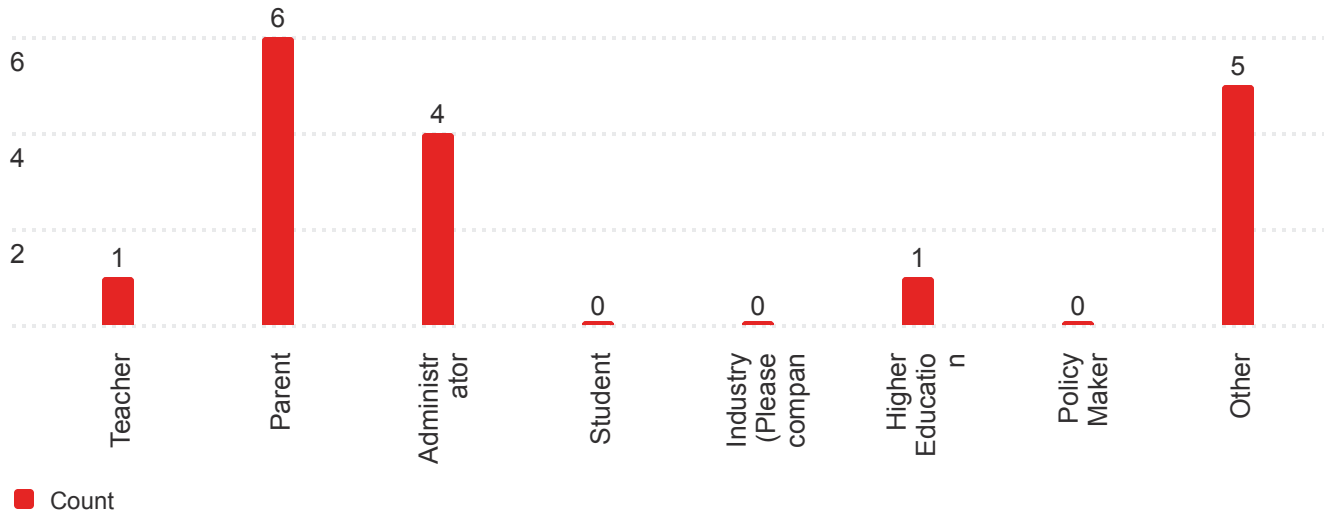


**Q3 - Please provide your primary role associated with providing public comment. You are welcome to select more than one role as necessary. - Selected Choice**



**Q4 - Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 1: English Language Proficiency Long-Term Goal below:**

Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 1: English Language Proficiency Long-Term Goal below:

It does seem like a bit of a stretch goal. I like the idea of half of our MLs exiting each year, but I'm not sure the numbers would even support the likelihood this could happen. Say we have 1000 students all at various amounts of time in the program. In 5 years time, 500 could definitely exit, but some each year. With a moving target, it will actually become more difficult to increase the percent of students exiting especially with less newcomers moving to the US because your students with strong language skills and ability to learn easily will meet proficiency and exit sooner, I don't think 50% is reasonable in 2030. We're more likely to hit 50% in the next 2-3 years than in 5 because our Newcomers quickly acquiring language will exit before then. We will have a higher percentage of LTELs in 2030. A 2-3% increase in exits is more reasonable.

I think the focus on language learners in Section 1 is needed and valuable. There has been a lack of attention to these learners in the past.

I believe the long term goal of 4.2 Composite plus 3.5 speaking should continue to be monitored and revisited. With the reduction in expectation, I continue to be concerned that teachers will reduce classroom expectations to meet the lowered goal, and that over time, the numbers of students reaching fluency will drop to the levels they were when it was reduced from a 5 to the current goal. I would also like to see the goal changed to offer 2 pathways -- keep the 4.2 C+3.5 S and also allow students who reach a composite of 5 or 6 to exit.

Section 1 mentions that the new plan for assessing students' progress in English acquisition takes the student's age into account. In fact, the plan does not.

#### Test of Survey

## Q5 - Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 2: Progress in Achieving English Language Proficiency (ELP) Indicator below:

Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 2: Progress in Achieving English Language Proficiency (ELP) Indicator below:

I appreciate the changes, having multiple tables was complex. This will be easier to have the same expectations K-12.

I'm looking forward to greater flexibility in the accountability system requirements to attend to local LEA needs. Additional supports to schools for incentives in building educator pipelines is needed and would be well-used by our smaller LEA.

While I agree that the baseline level when a student is identified and the number of years of instruction should be factored into accountability, I do not believe these should be the sole basis for calculating a student's yearly goal. Instead, yearly goals should also take into account the student's grade level and actual performance each year and include a trajectory that reflects typical or above-typical progress.

Section 2 is a doozy. LEAs provided specific feedback to the USBE about the problems and conflicts that the previous system for determining English growth targets created. The new plan outlined in section 2 here addressed none of these problems and conflicts. This new system solves basically nothing. One complaint from the LEAs was that the previous system was not based on actual empirical data of the progress that real students make. This new system claims to have done so. If that is the case, then it was a step in the right direction. However, NONE of the problems CREATED by the previous system were solved here. It is still critically, fatally flawed. See below

Section 2 claims that this new system “moves away from a one-size-fits-all approach for determining growth targets for adequate progress.” This new system does not. In fact, it moves TOWARDS a one-size-fits-all approach. Though it \*is\* simpler than the previous system, by collapsing it all down into one chart that does not take into account the student's current age/grade nor their score from the prior year this new system is actually MORE of a one-size-fits-all approach than before.

In this new system, the two variables that are used to determine an individual student's growth target are : (1) the ELP (i.e. WIDA score) from the initial year of identification; and (2) how many years the student has been enrolled in the school. These are the WRONG variables. I will address each one separately:

(1) ELP score from initial year: After year two, the student's score from the initial year is no longer relevant; it is obsolete, expired data. All that matters is the student's score from the prior year because \*that\* score represents the student's actual current ability level, their actual current ELP (English Proficiency Level). Determining a student's growth target in 6th grade based on what their ELP level was in Kindergarten is wrong psychometrically, linguistically, and morally.

(2) How many years a student has been enrolled: This seems to have been included in order to approximate the student's age, but it does not do so. A 6 or 7 year old student learns a new language, neurologically, very differently than a 15 year old student. If the goal is to try to take into account the student's age, then base it off the student's current grade level, NOT their number of years enrolled in school. Don't use a variable that is adjacent to the right variable. Just use the right one.

Here are some additional problems that this new system does NOT take into account.

A) A school has to track what year each student was first identified as needing EL services AND know that student's initial WIDA score (i.e. ELP). This has to be tracked across years, across school level changes (elementary to middle, etc.), across districts (i.e. the student moves to a new district), etc. THIS is needlessly burdensome when all a school \*should\* need to know is what grade they are in now (their current age) and what their current ELP is now (their prior year's score).

B) The growth targets jump all around. For example, in the 3.0-4.1 row, the student must progress 0.4 points in year one, 0.1 points in year two, and then 0.3 points in year three. THIS inconsistency is very problematic.

C) The student's current age is not taken into account. I discussed this a little bit above. As all people trained in linguistics and/or language acquisition know, different \*ages\* acquire language differently. Using the number of years enrolled in school is NOT the same as age. This variable (years enrolled) should be replaced with the student's current grade.

D) The student's current ELP is not taken into account. As I described above, after two years, the student's initial ELP is obsolete. The important data point is to know what the student's CURRENT ELP is. As all people trained in linguistics and/or language acquisition know, students of differing language ability levels progress at different rates. Another problem that this incorrect variable creates is that when a student makes MORE progress than required in one year, they are punished the following year by still having the same growth target regardless of the above normal growth. A student may be above where they were target to be in year two, but not get credit for adequate growth if they made too much growth in year one. This is one of the reasons why the chart should only consider the student's incoming/current ELP level, not the obsolete data point from their initial year.

C & D) So the two data points used for determining the student's progress targets SHOULD be (1) the student's CURRENT grade and (2) the student's CURRENT ELP.

E) The chart for determining the adequate growth targets creates some irreconcilable conflicts. Students of the same age/grade and the same ELP level will be given dramatically different targets. For example Maria starts in kindergarten with a 2.0. If Maria hits all of her targets exactly, then she will be entering 3rd grade with a current ELP level of 3.4 and she will be expected to grow 0.5 during 3rd grade. Lupe, on the other hand, starts in 1st grade with a 3.0. If Lupe hits all of her growth targets, then she will also be entering 3rd grade with a current ELP level of 3.4. But Lupe is expected to only grow by 0.1 in 3rd grade. In other words, both students are the EXACT SAME age and have the EXACT SAME current ELP level (English ability level), yet one is expected to improve 0.5 and the other only 0.1. This is a fatal flaw. It literally breaks the whole system.

These are the major, critical, fatal flaws of this new proposed system for determining adequate EL progress. Changing the variables to (1) the student's current grade, and (2) the student's current ELP level (i.e. prior year's score) would solve all of this.

One growth table reduces confusion, especially since statewide data indicated that growth trends showed very little variation between grade level bands. I appreciate this change.

I do wish that we could change the n size from 10 ELs to 20 ELs. Often, schools with very small EL populations are designated as TSI and it stems from 1 or 2 families who often struggle with attendance. Moving to a higher n size works to negate this issue that would otherwise occur too often.

## Q6 - Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 3: Statewide Accountability System and School Support and Improvement Activities below:

Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 3: Statewide Accountability System and School Support and Improvement Activities below:

Still complex and challenging to explain to teachers why the school is on TSI, CSI, etc. and how to get out. I do not think it is appropriate to weight RISE testing proficiency so heavily for students still acquiring English. I think a higher percentage should be on language acquisition and growth. Less on proficiency. Expecting students to be proficient after 3 years in the country on RISE but not on WIDA seems misguided. And why can't we have separate SGPs for the EL subgroups? We're comparing ELs to students who are native English speakers. This is why so many schools are on TSI for EL. Students need more time to acquire the language and gain proficiency. Yes, accountability for moving the needle, but make the targets reasonable and compare apples to apples.

Students should never be separated by race. Disparity exists across all races and communities. Those who need help should receive equal opportunity. Equity implies control of outcome which is not plausible as everyone learns differently and has different circumstances. Equality is to be had by providing equal opportunity, regardless of race, sex, or ethnicity.

I appreciate the variety of options added to metrics for success. I also support easier, more transparent reporting mechanisms.

3 years is not enough time to exit TSI, especially when the first year has delayed designations like for the 2024-25 school year (with RISE ELA creating the delays and designations not being released until January 2026). It gives very little time for schools to do a comprehensive needs analysis, create a plan (and get it aspects of it approved in time for Landtrust deadlines), allocate the resources (which are often spent or spoken for by January) which are often dependent on funding sources like Landtrust, and begin to implement the plan. I believe we should return to the 4 year cycle.

## Q7 - Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 4: Title III Entrance and Exit Procedures below:

Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 4: Title III Entrance and Exit Procedures below:

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I appreciate the new criteria for exiting our Alternative students. This has been much needed!

## Q8 - Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 5: Appendix A below:

Please share your public comment related to the Utah State Board of Education Draft ESSA State Plan Revision 2025, Section 5: Appendix A below:

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The table presented seems like an over simplification of how proficiency is reached. it's unlikely that the growth will occur on this trajectory based on language acquisition research showing it takes multiple years for students to reach proficiency.

Test of Survey