

RETHINKING EQUITY AND TEACHING FOR ENGLISH LANGUAGE LEARNERS (RETELL)
SUMMARY OF PUBLIC COMMENTS ON PROPOSED AMENDMENTS TO REGULATIONS: CMR 7.00, CMR 14.00, CMR 44.00
June 15, 2012

Key to Abbreviations:

AFT	American Federation of Teachers
ELL	English language learner
LI SIG	Low Incidence Special Interest Group
MABE	Massachusetts Association of Bilingual Education
MACTE	Massachusetts Association of Colleges for Teacher Education
MATSOL	Massachusetts Association of Teachers of Speakers of Other Languages
MTA	Massachusetts Teachers Association
NA	Comment is not specific to the regulations.

I. CROSS-CUTTING – Comments that impact more than one regulation

CONTRIBUTOR	REPRESENTATIVE COMMENTS	ESE RESPONSE & RECOMMENDATION
Teachers, Administrators, ELL Directors, MTA, AFT-MA	<ul style="list-style-type: none"> Provide funding so individual districts and incumbent teachers do not have to pay for training needed to earn an SEI Endorsement. 	<ul style="list-style-type: none"> NA. As of this writing, the budgets of the House and Senate contain an appropriation that would fund SEI Cohort Training for the 2012/2013 school year.
Teachers, Administrators, ELL Directors, MTA, AFT-MA	<ul style="list-style-type: none"> Concern: The accessibility of the SEI Endorsement for license renewal, particularly for those teachers and administrators who have to renew a license after June 2014 but before the cohort trainings are completed in June 2016 	<ul style="list-style-type: none"> ESE agrees with this concern and proposes revisions to delete the requirement for an SEI endorsement to renew or advance a license or to obtain a new license, which would have taken effect in July 1, 2014. Instead, ESE proposes to require the SEI endorsement only of applicants for initial licenses of core academic teachers, principals, assistant principals, and supervisor and directors, effective July 1, 2014, and for current

		teachers of ELLs (SEI teachers), and building administrators who supervise or evaluate SEI teachers, subject to the timetable established for SEI cohort training under 14.07. Current teachers of ELLs, and building administrators who must participate in SEI cohort training will not be able to renew their license if they do not earn the SEI endorsement by the time designated for their cohort, subject to a hardship exception. [603 CMR 14.07(2); 603 CMR 7.15 (9)(b)3; 603 CMR 44.03(5)]
Teachers, Administrators, ELL Directors	<ul style="list-style-type: none"> Implement based on a reasonable and realistic timeline. See above. 	<ul style="list-style-type: none"> ESE agrees that the timeline must be reasonable and realistic. See above.
Teachers, Administrators, Superintendents, School Committees, Higher Education Group, AFT, MTA, MATSOL	<ul style="list-style-type: none"> Recognize completed category trainings as part of the SEI Endorsement Suggested options: <ul style="list-style-type: none"> Recognize if demonstrate competency acquired from category trainings (MABE) Credit graduate-level course work in SEI (1 Teacher) Develop a verified database of category-trained teachers (1 ELL Specialist; 1 Curriculum Director) 	<ul style="list-style-type: none"> NA. ESE intends to credit individuals for their participation in category training. We will issue guidance on the credit that will be given and any additional training that would be required under the new regulations. No revision to the regulation is required.

II. 603 CMR 7.00 – EDUCATOR LICENSURE AND PREPARATION PROGRAM

CONTRIBUTOR	REPRESENTATIVE COMMENTS	ESE RESPONSE & RECOMMENDATION
	<i>7.02– Definitions of Core Academic Teachers</i>	
2 Principals 3 Curriculum Directors 8 Teachers Professor	<ul style="list-style-type: none"> Include more types of teachers who also teach ELLs such as gym, health, art, music, vocational, foreign language, engineering, computers 	<ul style="list-style-type: none"> ESE has focused on teachers who provide instruction in core academic areas, because, as the terms suggest, they the areas of primary importance as the students move on

MTA		through the elementary/secondary levels, to higher education and careers. We are studying data and talking to professionals in the field to determine whether to apply the SEI endorsement and training requirement to vocational instructors. We encourage all teachers through professional development opportunities to work toward earning the SEI endorsement.
2 Teachers LI Special Interest Group Sociedad Latina	<ul style="list-style-type: none"> • Include all teachers 	<ul style="list-style-type: none"> • See above
META	<ul style="list-style-type: none"> • Include tutors and paraprofessionals 	<ul style="list-style-type: none"> • See above.
LI Special Interest Group	<ul style="list-style-type: none"> • Concern: If all teachers have the SEI Endorsement, districts would eliminate special SEI teachers and teams 	<ul style="list-style-type: none"> • The proposed regulations do not require the SEI endorsement of all teachers. See above.
MTA	<ul style="list-style-type: none"> • Wording: change “core academic teacher” to “teachers of SEI subjects” 	<ul style="list-style-type: none"> • We do not agree that the proposed language is an improvement over the language proposed by ESE. The respective subject matter content areas are not “SEI subjects,” and for this reason, is confusing.
	<i>7.04 (2)(b) & (c) – Requirements for Teacher Licensure</i>	
1 ELL Specialist 1 Teacher	<ul style="list-style-type: none"> • Include an “Endorsement for ESL Teachers” 	<ul style="list-style-type: none"> • ESL teachers are licensed. They must meet the subject matter knowledge requirements and professional standards set forth at 603 CMR 7.06(9) and 7.08.
	<i>7.05 – Routes to Initial Teacher and Specialist Teacher Licenses</i>	
MACTE	<ul style="list-style-type: none"> • Require all preliminary licensed teachers to obtain an SEI Endorsement 	<ul style="list-style-type: none"> • As of July 1, 2014, teachers with a preliminary license will be required to earn an SEI Endorsement in order to obtain an initial license. [603 CMR 7.05(3),(4)]
	<i>7.08 – Professional Standards for Teachers</i>	
1 Teacher	<ul style="list-style-type: none"> • Change §7.08 (2)(a)(9) to “Use appropriate 	<ul style="list-style-type: none"> • ESE believes that the concepts reflected in

	and effective (research-based) strategies to make comprehensible lessons for ELLs in each content area, grade, and proficiency level.”	this language are covered in 603 CMR 7.08(2).
1 Teacher	<ul style="list-style-type: none"> Change §7.08 (2)(b)(2)(g) to “Understands the acquisition process of first and second/additional languages, the development of literacy, and the role of academic language in planning and delivering effective instruction.” 	<ul style="list-style-type: none"> ESE has revised language in 603 CMR 7.08(2)(b)(2)(h), which reflects the concepts in this comment. [603 CMR 7.08(2)(b)(2)(g)]
1 Teacher MABE	<ul style="list-style-type: none"> Include the following standards: <ul style="list-style-type: none"> Legal and moral responsibilities (under professional responsibility) (1 teacher) Knowledge of culturally responsible social and emotional development (MABE) 	<ul style="list-style-type: none"> ESE believes the language in the proposed regulations adequately addresses professional standards and required knowledge, including socio-cultural and affective factors in second language acquisition, and legal requirements. [603 CMR 7.08(2) and 7.14 (1)(b)]
Sociedad Latina	<ul style="list-style-type: none"> Supports the regulation’s inclusion of collaboration with families and recognizing culture 	<ul style="list-style-type: none"> No response required.
	<i>7.09 – Licenses and Routes for Administrators</i>	
1 Curriculum Director Sociedad Latina	<ul style="list-style-type: none"> Supports the regulation’s inclusion of an SEI Endorsement requirement for administrators 	<ul style="list-style-type: none"> ESE has retained this requirement for administrators of teachers with ELLs and for administrators seeking an initial license. [603 CMR 14.07(1); 603 CMR 7.09, respectively]
	<i>7.14 (1)(a) – SEI Teacher Endorsement [ESE Course, Assessment, Bachelor’s/Graduate Degree]</i>	
Teachers 1 Professor MTA	<ul style="list-style-type: none"> Clarify the different options available for satisfying the SEI Teacher Endorsement 	<ul style="list-style-type: none"> The regulations state the ways in which one may qualify for an SEI Teacher Endorsement. [603 CMR 7.14(1)(h)] The Department will issue guidelines on approved courses and on assessments. ESE recommends revising 603 CMR 7.14 (1)(h) so that possession of the following licenses also will qualify an individual for the SEI teacher endorsement:

		Possession of an English as a Second Language license or an English Language Learners license[603 CMR 7.14(1)(h)]
<p>META MATSOL</p> <p>2 Curriculum Directors, 1 Consultant, MATSOL</p> <p>Teachers, Administrators LI Special Interest Group</p> <p>1 Professor</p> <p>1 Teacher, Collaborative for Educational Services</p> <p>LI SIG, Ayer-Shirley RSD</p> <p>1 Curriculum Director</p>	<p>ESE Course:</p> <ul style="list-style-type: none"> • Need to have more specific information about the RETELL Course <ul style="list-style-type: none"> ○ Including: Who will teach the course, how will teachers be observed in the classroom, what is the content of the course ○ Concern: RETELL Course length and hours required are too small ○ Concern: The RETELL course only being offered at UMass-Boston ○ Concern: Effectiveness of online courses • Creation of additional types of trainings <ul style="list-style-type: none"> ○ Create separate training for each type of endorsement ○ Modify trainings to school district needs ○ Allow trainers to implement courses; allow school districts to identify trainers ○ Distinguish between elementary and secondary teachers by using separate trainings 	<ul style="list-style-type: none"> • These comments concerns details of the SEI or RETELL course and training, which are not addressed in the regulations. ESE will be issuing information about the SEI Cohort training in the coming weeks. The course will be piloted this summer and ESE will use data from the pilot to revise and improve the course as necessary.
<p>AFT, MTA</p> <p>MTA</p>	<p>Assessment:</p> <ul style="list-style-type: none"> • Need to develop an assessment as soon as possible <ul style="list-style-type: none"> ○ Suggested ESE deadline to create a test – 90 days (MTA) • Develop test based on similar tests used in other states – the California test for English 	<ul style="list-style-type: none"> • These comments concern the timing and type of assessment to be developed, which is outside of the regulatory language. ESE will consider these comments going forward.

1 ELL Specialist, 1 Curriculum Director	<p>Learners</p> <ul style="list-style-type: none"> • Test alone is not enough 	
<p>Higher Education Group, MACTE, 2 Teachers</p> <p>Professors, MACTE</p> <p>Professors</p>	<p>Bachelor's and Graduate-Level Training:</p> <ul style="list-style-type: none"> • Favor colleges developing their own RETELL-like courses and allowing those courses to be sufficient for an SEI Endorsement • Need additional information for colleges about the expectations for college and graduate-level work that will qualify for the SEI Endorsement • Potential Issues for colleges implementing this coursework <ul style="list-style-type: none"> ○ Students with limited availability in their schedules for additional required courses ○ Cost of implementing new courses ○ Does the ESE need to approve professors? ○ Length of time to develop and gain approval for a college course (months to a year) 	<ul style="list-style-type: none"> • Guidelines for Program Approval will be issued by the Commissioner, in consultation with the Commissioner of Higher Education. [603 CMR 7.03(7)(f)] • Programs will need to submit documentation to ESE by June 1, 2013 for approval. [603 CMR 7.03(7)(f)]
	<i>7.14 (1)(b) – SEI Teacher Endorsement [Subject Matter Knowledge]</i>	
<p>Teachers, Professors, META</p> <p>Sociedad Latina Teachers</p> <p>1 ELL Director, Teachers</p> <p>1 Teacher</p>	<ul style="list-style-type: none"> • Include the following areas of knowledge: <ul style="list-style-type: none"> ○ Teaching SIFE (students with interrupted formal education) ○ Cultural proficiency ○ Parent engagement ○ WIDA and ACCESS ○ Identification (and over-identification) 	<ul style="list-style-type: none"> • ESE believes the language provided in the regulations adequately addresses the professional standards and subject matter knowledge necessary to provide SEI. [603 CMR 7.14(1)(b)] ESE also expects that educators will have opportunities to gain additional understanding of the educational

<p>The following had very specific recommendations:</p> <ul style="list-style-type: none"> - Higher Education Group - 1 Principal 	<p>of ELLs)</p>	<p>needs of ELLs, including the diverse needs of the ELL population, through on-going professional development opportunities, including those offered by ESE.</p>
<p>Teachers Curriculum Director</p>	<ul style="list-style-type: none"> • Include more information on best practices, rather than theory 	<ul style="list-style-type: none"> • ESE agrees and recommends revised language to reflect an emphasis on practices and approaches. See 603 CMR 7.14(1)(b)(8)(i).
<p>1 Curriculum Director</p>	<ul style="list-style-type: none"> • Concern: Redundancy of course material for foreign language teachers 	<ul style="list-style-type: none"> • Foreign language teachers are not considered “core academic teachers” and thus are not required to obtain the SEI Endorsement. [603 CMR 14.07(1)]
<p>Teachers MABE, MATSOL META, MATSOL</p>	<ul style="list-style-type: none"> • Develop a coaching and mentoring component • Include opportunities for the ESE to follow-up and observe the teachers 	<ul style="list-style-type: none"> • ESE agrees that coaching and mentoring is important and, assuming the proposed regulations are adopted, next steps include plans to develop this component.
<p><i>7.14 (2)(a)&(b) – SEI Administrator Endorsement</i></p>		
<p>MTA</p>	<ul style="list-style-type: none"> • Delete this entire section and require administrators to gain the same endorsement as teachers 	<ul style="list-style-type: none"> • ESE believes that a separate SEI Administrator Endorsement is appropriate. It will be based on a training/course of study that will provide the level of knowledge that the administrator needs to evaluate an SEI teacher.
<p>Sociedad Latina MABE, 1 Principal</p>	<ul style="list-style-type: none"> • Include the following areas of knowledge: <ul style="list-style-type: none"> ○ Cultural proficiency ○ Knowledge of state and federal laws 	<ul style="list-style-type: none"> • ESE believes the language in the proposed regulations covers these points. [603 CMR 7.14(2)(b)]
<p><i>7.14 (3) – Transitional Bilingual Learning Endorsement</i></p>		
<p>MABE,MATSOL META, 2 professors</p>	<ul style="list-style-type: none"> • Change the Endorsement to a “Bilingual/Two Way Bilingual Education License” and include several knowledge areas (see below). 	<ul style="list-style-type: none"> • ESE did not propose changes to the Transitional Bilingual Learning Endorsement; the only change in the proposed regulations is where the endorsement appears in 603 CMR 7.00. The substantive change proposed in this comment

		would require another public comment process.
MABE (had extensive list) 1 ELL Specialist	<ul style="list-style-type: none"> • Include the following areas of knowledge: <ul style="list-style-type: none"> ○ Understanding the cognitive benefits of bilingualism ○ Theory and practice; cross-cultural awareness ○ Development of biliteracy ○ Use of summative and formative assessment ○ Coursed in two specific languages 	See above.
	<i>7.15 (14) – Implementation</i>	
Many Comments	<ul style="list-style-type: none"> • Fix typo from “2004” to “2014” 	<ul style="list-style-type: none"> • The date was corrected to 2014. [603 CMR 7.15(14)(d)].
Sociedad Latina Higher Education Group, 1 Professor	<ul style="list-style-type: none"> • Consult with: <ul style="list-style-type: none"> ○ Community partners ○ Higher education community 	<ul style="list-style-type: none"> • ESE and OELAAA have consulted with relevant partners in developing the RETELL initiative and the regulations.

III. 603 CMR 14.00 – EDUCATION OF ENGLISH LEARNERS

CONTRIBUTOR	REPRESENTATIVE COMMENTS	ESE RESPONSE & RECOMMENDATION
	<i>General</i>	
Teachers Administrators MATSOL MABE LI Special Interest Group	<ul style="list-style-type: none"> • Support of regulation’s mandate of SEI Endorsement and professional development requirements 	<ul style="list-style-type: none"> • ESE agrees that the SEI Endorsement requirement for SEI teachers is important and that building administrators who evaluate or supervise these teachers should hold the Administrator Endorsement (or the Teacher Endorsement).
1 Principal Teachers	<ul style="list-style-type: none"> • Do not support the regulation’s mandate of SEI Endorsement and professional development requirements 	<ul style="list-style-type: none"> • Massachusetts has a duty under federal law to mandate preparation and training in SEI for educators of ELLs so that ELLs can access their education program.
	<i>14.07(1) [SEI Endorsement Requirement]</i>	
1 Administrator	<ul style="list-style-type: none"> • Administrator requirement should apply to 	<ul style="list-style-type: none"> • ESE’s rationale is to reach building

1 ELL Specialist	superintendents	administrators who have direct responsibility for teachers who provide SEI, and therefore, have the most direct impact on ELLs.
1 Teacher 5 Teachers 1 Teacher	<ul style="list-style-type: none"> • Endorsement should not apply to: <ul style="list-style-type: none"> ○ New Teachers ○ ESL Teachers ○ Low incidence districts 	<ul style="list-style-type: none"> • ESE proposes that applicants for an initial license as a core academic teacher meet the requirements for an SEI endorsement as of July 1, 2014. • As of July 1, 2016, under these final proposed regulations, any teacher with an ELL, regardless of the size of the school district, will be required to hold an SEI endorsement or obtain one within a year. During the period between August 1, 2012 and June 30, 2016, all SEI teachers, regardless of the size of the district will be required to participate in SEI cohort training to earn an SEI teacher endorsement. In these final proposed regulations, we do not otherwise require an incumbent core academic teacher to meet the requirements for an SEI endorsement. • ESE has recommended revised language that makes teachers with an ESL license eligible for an SEI Teacher endorsement. (603 CMR 7.14(1)(a)(4).)
MTA 1 Teacher	<ul style="list-style-type: none"> • Clarify that the SEI Endorsement requirements also apply to teachers in charter schools 	<ul style="list-style-type: none"> • ESE agrees and recommends that the language “including charter schools and education collaborative” be added to 603 CMR 14.07 to clarify that core academic teachers who teach ELLs in charter schools and collaborative must obtain the SEI Endorsement. [603 CMR 14.07(1)] Revised language is also recommended in the definition of SEI endorsement at 603 CMR 7.02 and 603 CMR 44.02 to make clear that the endorsement may be issued to one who is

		not required to be licensed but is otherwise required by law to obtain the endorsement. For example, an SEI teacher in a charter school may not be required to hold an educator license but will be required to earn an SEI endorsement.
1 ELL Director	<ul style="list-style-type: none"> Concern: Difficulty when administrators are frequently transferred to different schools 	<ul style="list-style-type: none"> ESE acknowledges that staff turnover may occur and encourages districts to plan for such turnovers.
MTA	<ul style="list-style-type: none"> Change “SEI Endorsement” to “SEI Supplement” 	<ul style="list-style-type: none"> ESE believes the current language, “SEI Endorsement” is appropriate and sufficiently broad to cover those who do not hold an educator license.
	<i>14.07(2) [Cohort Process]</i>	
Administrators, Ayer Shirley RSD, MTA, META, Sociedad Latina Teachers 1 Parent	<ul style="list-style-type: none"> Considerations when determining cohorts: <ul style="list-style-type: none"> High incidence, low performing districts The number of teachers in the district that have taken Category trainings Teachers whose 2012-2013 classes will have ELLs 	<ul style="list-style-type: none"> The ESE will work with the districts and schools in developing the cohorts, focusing initially on high incidence, low performing districts, and determining which teachers/administrators have participated in category trainings.
1 Superintendent LI Special Interest Group MATSOL	<ul style="list-style-type: none"> Remember to include low incidence districts 	<ul style="list-style-type: none"> All core academic teachers who provide SEI to ELLs and the administrators that supervise and evaluate them must participate in cohort training to earn the SEI Endorsement under the proposed regulations. [603 CMR 14.07(2)]
	<i>14.07(3) [July 2016 Deadline]</i>	
Teachers AFT	<ul style="list-style-type: none"> Concern: What about teachers who plan to retire, rather than renew their licenses? 	<ul style="list-style-type: none"> Starting on July 1, 2016, all core academic teachers who provide SEI to ELLs must either hold an SEI Teacher Endorsement or earn such endorsement within one year of being assigned an ELL student. [603 CMR 14.07(3)] A core academic teacher who does not have an ELL student, will not be required to earn an SEI endorsement.

IV. 603 CMR 44.00 – RECERTIFICATION

CONTRIBUTOR	REPRESENTATIVE COMMENTS	ESE RESPONSE & RECOMMENDATION
	<i>General</i>	
MTA	<ul style="list-style-type: none"> Wording: change “license” to “professional license” 	<ul style="list-style-type: none"> The term “license” is defined as a professional license.
	<i>44.04 – Approval of Professional Development Plans</i>	
MTA	<ul style="list-style-type: none"> In 44.04(1)(c), add the following language at the end: "Nothing in these regulations prohibits educators from including professional development activities from their educator plans pursuant to 603 CMR 35. (Educator Evaluation) in their Individual Professional Development Plans pursuant to these regulations." 	<ul style="list-style-type: none"> The ESE believes the language provided covers this point. [603 CMR 44.04(1)(c)]
MTA	<ul style="list-style-type: none"> In 44.04(3) add the following language at the end: "Educators may be required to provide a copy of their signed completed professional development plans upon the request of ESE." 	<ul style="list-style-type: none"> ESE agrees and recommends similar language in revised 44.04(3).
	<i>44.06 – Provisions applicable to licenses renewed on or after July 1, 2014</i>	
AFT	<ul style="list-style-type: none"> Support the regulation’s requirement of 15 PDPs in SEI 	<ul style="list-style-type: none"> No response required.
MTA Lynn Teachers Union	<ul style="list-style-type: none"> The 2014 deadline is unrealistic and should be changed in 2016 	<ul style="list-style-type: none"> ESE agrees and recommends changing the provisions to apply to licenses renewed on or after July 1, 2016. [603 CMR 44.06]
Teachers AFT MATSOL	<ul style="list-style-type: none"> Concern: availability of PDP offerings; what courses will be offered; the quality of these courses to support ELLs 	<ul style="list-style-type: none"> NA.
1 Teacher AFT MTA	<ul style="list-style-type: none"> Count SEI Endorsement training as part of PDPs required for license renewal Options to do so: 	<ul style="list-style-type: none"> ESE agrees and recommends language that makes clear that the PDPs earned by completing an ESE-approved SEI Endorsement course can be applied to more

AFT	<ul style="list-style-type: none"> ○ Consider SEI Endorsement training as part of content-based PDPs ○ Eliminate the strict number of content PDPs ○ Apply PDPs to a variety of renewal cycles 	than one renewal cycle. [603 CMR 44.09(2)]
MTA	<ul style="list-style-type: none"> ● Change minimum requirements for renewal to: <ul style="list-style-type: none"> ○ 15 PDPs in content area ○ 15 PDPs in ESL or SEI ○ 15 PDPs in special education ○ 15 PDPs in pedagogy ○ 90 PDPs in electives 	<ul style="list-style-type: none"> ● ESE believes that the PDP requirements for licenses renewed on or after July 1, 2016 are appropriately distributed. [603 CMR 44.06]

V. Other comments that are not specific to regulation content.

CONTRIBUTOR	REPRESENTATIVE COMMENTS	ESE RESPONSE & RECOMMENDATION
Higher Education Group	<ul style="list-style-type: none"> The HEG can assist the ESE on the RETELL initiative by: offering Summer Institutes; evaluate teachers and administrators trained during the RETELL course 	NA
MATSOL	<ul style="list-style-type: none"> Needs of many ELLs need to be addressed by licensed bilingual education or ESL teachers; the SEI Endorsement is not sufficient 	NA
1 Teacher	<ul style="list-style-type: none"> Consider local tutors for ELL students 	
1 Professor	<ul style="list-style-type: none"> Need an explanation of 603 CMR 44.04(4) on mathematics educators in low performing schools 	NA
1 Teacher	<ul style="list-style-type: none"> MTEL Test for elementary and middle school teachers should not cover trigonometry and calculus 	NA
1 Superintendent Teachers	<ul style="list-style-type: none"> Create smaller class sizes 	NA
2 Teachers	<ul style="list-style-type: none"> Concern: How will the 2.5 hours in ESL legally required for beginner ELLs be affected? 	NA
2 Parent	<ul style="list-style-type: none"> Districts that fail to comply with required ESL time for ELLs; address the inadequacy of ESL programs 	NA
3 Teachers	<ul style="list-style-type: none"> Need stricter ESL licensure requirements 	NA
1 Teacher	<ul style="list-style-type: none"> Develop a stronger ESL MTEL test 	NA
MABE	<ul style="list-style-type: none"> Develop better training and professional development for ESL teachers 	NA
1 Curriculum Director	<ul style="list-style-type: none"> Consider the difficulties of ESL-pullout instruction 	NA
1 Superintendent	<ul style="list-style-type: none"> Provide funding for districts to hire ELL support staff 	NA
META	<ul style="list-style-type: none"> Impact of tutors and paraprofessionals on 	NA

	ELL student achievement and program quality	
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