



**The following are the Texas State Teachers Association’s comments regarding the Proposed Revision to 19 TAC Chapter 89, Adaptations for Special Populations, Subchapter BB, Commissioner’s Rules Concerning State Plan for Educating English Language Learners**

**1. 19 Texas Administrative Code §89.1203 - Definitions**

**Text of TAC §89.1203 - Definitions**

(12) Alternative language program—A program that meets the affective, linguistic, and cognitive needs of ELs and equips the teacher under a bilingual education or ESL waiver described in §89.1207 of this title (relating to Bilingual Education Exceptions and English as a Second Language Waivers) through the comprehensive professional development plan.

TSTA supports the addition of *alternative language program* in the definitions for terms used in Chapter 89, Subchapter BB. However, we recommend that the definition clarify that the alternative language programs maintain content-focused orientation and service English Learners alongside English-fluent peers. Research shows that pull-out programs that focus exclusively on English-language acquisition are not only less effective at developing second language competencies but also disadvantage students academically due to the missed instruction in the general education classroom. There is also substantial research demonstrating that pull-out, English-only programming is culturally subtractive and not celebratory of the immigrant experience.

**2. 19 Texas Administrative Code — Bilingual Education Exceptions and English as a Second Language Waivers**

**Text of §89.1207 — Bilingual Education Exceptions and English as a Second Language Waivers.**

(D) an assurance that the school district will implement a comprehensive professional development plan that:

- (i) is ongoing and targets the development of the knowledge, skills, and competencies needed to serve the needs of English learners;
- (ii) includes the teachers who are not certified or not appropriately certified who are assigned to implement the proposed alternative language program; and
- (iii) may include additional teachers who work with English learners;

Given the abovementioned, TSTA recommends amending the comprehensive professional development plan standards to include professional learning opportunities in the areas of content-focused instruction and cultural competencies. We believe teachers would most benefit most from professional development — and be better positioned to become bilingual and/or ESL certified — if the professional learning reflects this need.

We recommend language reflect this student-centered consideration and be changed to

(i) is ongoing and targets the development of the knowledge, skills, and cultural competencies needed to serve the social, emotional, and content-focused needs of English learners;