



## NEW YORK STATE ASSOCIATION FOR BILINGUAL EDUCATION

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Dr. John B. King, Jr.  
Commissioner  
New York State Education Department  
89 Washington Avenue  
Albany, New York 12234

Dear Commissioner King,

On behalf of the Executive Board, Delegate Assembly, and Executive Director of The New York State Association for Bilingual Education (NYSABE), I express our appreciation for the thoughtful and groundbreaking work undertaken by the New York State Department of Education (NYSED) under your leadership in proposing revisions to CR Part 154. We applaud the efforts that NYSED has made to conduct a comprehensive revision process by including focus groups, surveys and conversations with the Committee of Bilingual and English-as-a-Second-Language Practitioners and NYSABE. We are pleased that many of the recommendations made by NYSABE and other stakeholders have been incorporated into the proposed revisions of CR Part 154.

We are supportive of your efforts to move New York State's regulatory framework from a deficit model to an asset-based model for ELL/bilingual learners who at the present time are classified under federal law as limited English proficient (LEP). Your commitment to ELL/Bilingual learners is evidenced by your efforts to align CR Part 154 with cutting edge research and best practices to ensure that all teachers actively support the academic language development of their ELL/bilingual learners. Also, by recommending the inclusion of early childhood education under the guidance of CR Part 154, you have further demonstrated your commitment to these students by assuring that their pathway to college and career readiness starts at an early age.

Attached is NYSABE's detailed feedback, which includes our recommended modifications, requests for clarification as well as areas for inclusion of issues currently not addressed in the proposed recommendations. There are multiple areas that we are in complete agreement with NYSED's proposed recommendations, but in the interest of brevity, we have only included the areas where we are proposing additions and modifications or requesting clarifications.

New York State is leading the nation in creating a clear and consistent set of requirements and guidance for high quality educational programs and services for ELL/bilingual learners, as reflected in the development of the Bilingual Common Core Initiative. If implemented properly with appropriate supports, this initiative, coupled with aligned changes in CR Part 154, have the potential to promote deep innovation in schools and districts that will provide New York's ELL/bilingual learners with the early identification, instructional programs, and supports leading to the reduction of the achievement gap for these students.

As we urge your prompt adoption of the long-awaited revision of CR Part 154, we thank you for your vigorous, forward-looking leadership, and your careful review and consideration of our recommendations

Sincerely,

*Yazmín Torres*

Yazmín Torres  
NYSABE President