



## NEW YORK STATE ASSOCIATION FOR BILINGUAL EDUCATION

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November 24, 2014

Mr. Cosimo Tangorra  
NYSED, Office of P-12 Education  
State Education Building, 2M West  
89 Washington Avenue  
Albany, NY 12234

Dear Mr. Tangorra,

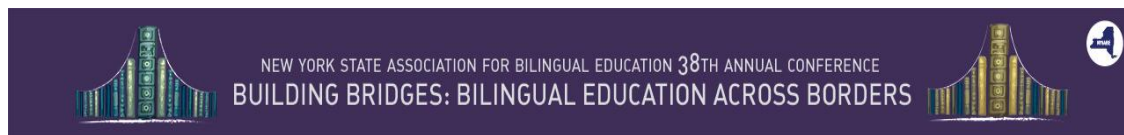
On behalf of the Executive Board, Delegate Assembly, Executive Director, and members of the New York State Association for Bilingual Education (NYSABE), I present to you our organization's comments on the proposed amendments to Commissioner's Regulations Part 154-2.

The main goal of NYSABE is to advocate for equitable and meaningful educational opportunities for all English language learners (ELLs)/bilingual learners in New York State by strengthening the professional skills of the educational community and promoting the significant participation of parents and families of ELLs/bilingual learners in the decision-making process at schools. To this end, the comments presented in this document reflect the collective views and expertise of more than 1,000 members, including educators, parents, and community members, whom NYSABE represents.

In closing, NYSABE applauds the work of the NYS Board of Regents and the New York State Education Department's staff which reflects their commitment to ensuring that ELLs/bilingual learners have equal access to all educational opportunities. We are also grateful for this opportunity to present our comments on the proposed amendments to Part 154-2.

Sincerely,

Tatyana Kleyn, Ed.D.  
NYSABE President



**March 12-14, 2015 - Crowne Plaza Hotel - White Plains, New York**  
**[www.nysabeconference.net](http://www.nysabeconference.net)**

## **COMMENTS ON THE PROPOSED AMENDMENTS TO PART 154-2 OF THE COMMISSIONER'S REGULATIONS**

### **INTRODUCTION**

The comments made by NYSABE in this document are based on the following beliefs:

- NYSABE acknowledges the profound impact that the meaningful participation of parents/families in the education of their children has on their academic achievement and socio-emotional development. For this reason, NYSABE is committed to promoting the strengthening of school-family partnerships by (1) valuing the home language and culture of parents and families of ELLs/bilingual learners, (2) promoting ongoing communication between schools and these parents/families, (3) supporting schools' efforts to offer educational experiences for parents and families of ELLs/bilingual learners so they can support their children's learning at home, and (4) empowering these parents/families to participate in the educational decision-making process and exercise their parental rights regarding the education of their children.
  
- NYSABE believes that all district/school administrators, teachers, clinical/support personnel (i.e. guidance counselors, psychologists, social workers, etc.) and teacher assistants should receive meaningful and relevant professional development specific to the needs of ELLs/bilingual learners. As the population of ELLs/bilingual learners continues to increase across the state, it is likely that the vast majority of educators can expect to be involved in the education of ELLs at some point in their careers. Therefore, it is imperative that all district leaders, school building administrators and supervisors, teachers, clinical/support personnel, and teacher assistants in New York State are prepared to meet the unique needs of ELLs/bilingual learners by participating in frequent, research-based, and high quality professional development experiences focusing on best educational practices and approaches for working with ELLs/bilingual learners.

### **COMMENTS AND RECOMMENDATIONS**

In accordance with the beliefs stated above, NYSABE:

- Supports the proposed amendment to Part 154-2.3 (f)(3) and 154-2.3(k) to "afford parents ten school days, rather than five school days as originally proposed, to sign and return to the school district the notification form indicating that the parent is either in agreement with the child being placed in a bilingual education program or directs the district to place the child in an English as a new language/English as a second language program." (NYSED Memorandum, September 11, 2014).
  
- Supports the proposed amendment to allow, under certain circumstances, school districts to request a waiver to "the requirement that a minimum of 15% of the required professional development clock hours for all teachers and a minimum of 50% of the

required professional development clock hours for all bilingual and English as a second language teachers be dedicated to the education of ELLs/bilingual learners.” (NYSED Memorandum, September 11, 2014). School districts where there are fewer than thirty ELLs/bilingual learners enrolled or ELLs/bilingual learners make up less than five percent of the district’s total student population could apply for the waiver on an annual basis. “School districts would apply for a waiver in a format and timeline as may be prescribed by the Commissioner, and would be required to submit evidence that all teachers, including bilingual and English as a second language teachers, receive training in specific areas sufficient to meet the needs of the district’s English language learners.” (NYSED Memorandum, September 11, 2014).

- Recommends that the professional development requirements established for teachers be extended to clinical/support personnel, i.e. school psychologists, guidance counselors, social workers, who need to be prepared to engage in the identification process, assessment, and instructional support for ELLs/bilingual learners with disabilities.

As we continue to serve the students, families, educators, members of community-based and private entities whom NYSABE represents, we reaffirm our commitment to ensuring equitable and meaningful access to high quality bilingual education programs for all ELLs/bilingual learners in New York State by submitting these comments on the proposed amendments to C.R. Part 154-2.

Respectfully,

Tatyana Kleyn. Ed.D.  
NYSABE President