

NJTESOL/NJBE, Inc.

AN AFFILIATE OF NJEA, TESOL AND NABE

New Jersey Teachers of English to Speakers of Other Languages/New Jersey Bilingual Educators, Incorporated

A professional organization for those concerned with the teaching of English as a Second Language and Bilingual Education

Public comments

On behalf of NJTESOL/NJBE, a professional organization for those concerned with the needs of English Learners (ELs), we would like to comment on the proposed amendments in the Adult Education Code, NJAC 6A:20. Our membership is comprised of educators and administrators dedicated to the instruction of English learners (ELs) at all levels of public and private education. NJTESOL/NJBE's mission is to actively support the development of bilingual education and the teaching of English as a Second Language by strengthening instruction at all levels.

We support the following changes:

6A:20-1.1(a)5. Reviewing data on adults without high school diplomas to help ensure programming is meeting their needs.

This is particularly important for the influx of English Learners with interrupted formal education (SIFE). A working group of EL educators and administrators under the auspices of NJ Principals' and Supervisors' Association (NJPSA) recently created a document entitled, [Using Existing Policy to Support Language Learners: Individualized Student Learning Opportunities](#) (also known as Option 2). This document will immeasurably assist adult high school administrators in meeting this review of data. The inclusion of this reference should be applied in 6A:20-2.5 Award of credit. (see below)

6A:20- 1.2 Definitions

“Adult high school” means a district board of education school that conducts supervised educational activities in the day or evening to provide persons [18] **16 years** of age or older.

The Adult High School may be the best option for the influx of Students with Interrupted Formal Education. These students are usually over age and require options to the traditional plan. Allowing 16-year old students to attend will afford these students an opportunity to receive a high school diploma.

These definitions are consistent with the definitions in the Bilingual Education Code (6A:15):

“English language learner” or “ELL” means a student whose native language is other than English. The term refers to students with varying degrees of English language proficiency in any one of the domains of speaking, reading, writing, or listening and is synonymous with limited English-speaking ability as used in N.J.S.A. 18A:35-15 to 26.

“English language proficiency” means the full command of language skills, including proficiency in listening, speaking, reading, and writing of the English language. English language proficiency is defined operationally as the passing score on an English language proficiency test. To attain proficiency in the English language requires more time than to attain fluency.

We suggest the following addition under

6A:20-2.5 Award of credit

Include Option 2 flexibility. Refer to above mentioned [NJPSA document](#)

We strongly urge the NJ Department of Education to reconsider the following code. It is inconsistent and inequitable with the regulations for the traditional high school EL. ELs in traditional high schools are not required to demonstrate English fluency on an English proficiency assessment. English learners have the opportunity to continue their education at Community Colleges which offer ESL courses, so there is no reason to require a certain level of English proficiency upon graduation. This regulation may discourage English learners from attending an adult high school. Since this regulation differs from the traditional high school code, it contradicts the concept of equity for this particular population.

6A:20-2.3 English language learners and individuals with disabilities

(a) English language learners shall be required to demonstrate language [fluency] proficiency on a State-approved English proficiency assessment at a score level determined by the State Board of Education.

1. English language learners shall be referred to appropriate classes in the adult high school to attain English language proficiency. If the language improvement needs of the individual cannot be met by the adult high school, then the principal shall refer the person to a New Jersey Department of Labor and Workforce Development Career Connections site (<https://careerconnections.nj.gov/>).

6A:2.4(a)2 Graduation

English language learners who are enrolled in an adult high school and are unable to pass the Statewide assessment for graduation, pursuant to N.J.A.C. 6A:8-5.1, shall receive further evaluation through the portfolio appeals process in their native language, when available, pursuant to N.J.A.C. 6A:8-5.1(h), and **shall demonstrate English language fluency on a Department-approved English proficiency assessment.**

Thank you for the opportunity to comment on these Code revisions which impact English learners in New Jersey.

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NJTESOL-NJBE

Advocacy Representative