

Proposed priority 1 (a) of the Department of Education's Notice of Proposed Priorities for the Enhanced Assessment Instruments grants program (Docket ID: ED-2010-OESE-0018) details requirements for the design of a valid, reliable, and fair system to annually assess the English language proficiency of English language learners in grades K through 12. Clause 5 of this priority specifies that the proposed system "*Measure the linguistic components of language (e.g., phonology, morphology, syntax, vocabulary).*"

The Linguistic Society of America (LSA) strongly encourages the adoption of the larger priority and Clause 5 in particular for the following reasons.

1. All English learners (ELs) are learning English as a second language (ESL), in addition to the language they learned natively. The transfer of knowledge from a language students know to a language they are learning in an academic setting is strongly aided by their facility in making comparisons between the structures of their first and second languages. It is the terminology of linguistic science that provides the means for stating these comparisons explicitly.
2. Understanding of linguistic concepts assists in developing accuracy in language. This is particularly important in developing writing skills, where the statement of the rules guiding the norms of writing and the control of various genres of written language are couched in linguistic terms.
3. The Common Core State Standards for English Language Arts to a considerable extent rely on linguistic concepts and terminology to succinctly state individual standards. At the high school level, in particular, some standards specifically address language capabilities, for example, an ability to make writing cohesive, that themselves presuppose a firm grounding in linguistic knowledge.
4. Explicit knowledge of the linguistic framework on which all language skills are based provides an important organizational tool for second language learners to guide their learning. Many ESL curricula and texts, in fact, are organized on research findings from second language acquisition that address the sequencing of learning on linguistic principles.
5. Assessment of linguistic components of language will necessarily focus curriculum and instruction on language structure and provide English learners with a tool set with which they can better understand the varying language demands of their content subjects, for instance, how the language of mathematics differs from the language of social studies.

Testing of proficiency with linguistic components can be approached either directly or inferentially. Direct testing has the advantage of being able to accurately pinpoint particular linguistic skills, but may elicit the demonstration of skill outside of a normal communicative context. On the other hand, testing skills inferentially embeds test questions in natural language contexts, but potentially makes it difficult to interpret a particular skill from a response.

LSA believes that the priority expressed in Clause 5 does suggest that some direct measure of linguistic skills would be useful in discerning ELs capabilities to comprehend and produce language and would give

teachers valuable diagnostic information about the strengths and weaknesses of individual students. However, LSA also believes that direct testing does not obviate the need to test English language proficiency as a communicative goal. LSA recommends, then, that the proposed measure of the linguistic components of language be developed separately from measures of communicative proficiency. Also, to enhance the potential of the proposed measure to provide diagnostic information, we recommend that it should be developed as part of a formative classroom assessment strategy, the results of which can be aggregated over multiple administrations to provide a composite score for large-scale accountability purposes.