



Language Opportunity

Massachusetts Language Opportunity Coalition

Statement Opposing Proposed Regulation 603 CMR 31.07 for the Seal of Biliteracy

The Language Opportunity Coalition strongly objects to the proposed regulation 603 CMR 31.07 that establishes the award criteria for the Seal of Biliteracy. We ask the Board of Education not to approve the regulation in the current form.

1. The proposed award criteria do not follow national guidelines for proficiency levels for the Seal of Biliteracy.
2. The proposed award criteria for English proficiency based solely on 10th grade ELA MCAS scores will inequitably exclude English learners, former English learners, and other students.
3. The proposed award criteria do not allow English Learners the same amount of time to develop language proficiency as world language learners: Proficiency in English has to be demonstrated in 10th grade, while proficiency in a world language does not need to be demonstrated until 12th grade.
4. The proposed award criteria do not implement the multi-tiered award structure developed by the Massachusetts Seal of Biliteracy Pilot Project to promote and reward long term and sustained language study.

The award criteria defined for the Massachusetts Seal of Biliteracy Pilot Project (2014-18) were designed to be a motivational and inclusive award that recognizes the language attainment of as many students as possible. Our goal in supporting establishment of the Seal of Biliteracy is to 1) support and reward long-term and sustained language study of English, native languages, and world languages, and 2) recognize and reward the linguistic assets that multilingual students bring to our schools. The proposed regulations will exclude many students, especially students whose native language is not English.

The LOOK Act requires that the Department consider national standards and the local work of the Seal of Biliteracy Pilot Project in developing criteria for the award. Massachusetts is in a unique position because we can learn both from the local three-year Seal of Biliteracy Pilot Project and from emerging research on implementation of the Seal of Biliteracy nationally. We ask that the Department consult with the Language Opportunity Coalition and members of the Seal of Biliteracy Pilot Project to revise the regulations to ensure equity and opportunity for all students pursuing language study.

M.G.L. c. 71A, § 67

In developing the criteria to qualify for the state seal of biliteracy under section 1Q of chapter 69 of the General Laws, *the department of elementary and secondary education shall consider the work of national organizations and other states on such a seal, the work of the seal of biliteracy pilot project*, as well as other information deemed relevant by the department. (italics added)

Revised May 9, 2018



Discussion

Purpose of the Seal of Biliteracy: The Language Opportunity Coalition supports and concurs with the purpose of the Seal of Biliteracy as described in proposed regulation 603 CMR 31.01(4).

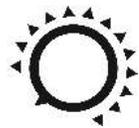
Proposed Regulation 603 CMR 31.01: Authority, Scope and Purposes

- (4) The purposes of the State Seal of Biliteracy are to:
- (a) Encourage students to study and master languages;
 - (b) Certify attainment of biliteracy skills;
 - (c) Recognize the value of language diversity;
 - (d) Provide employers with a method of identifying people with language and biliteracy skills;
 - (e) Provide universities with a method to recognize and give credit to applicants for attainment of high level skills in languages;
 - (f) Prepare students with skills that will benefit them in the labor market and the global society; and
 - (g) Strengthen intergroup communication and honor the multiple cultures and languages in a community.

However, the award criteria proposed in 603 CMR 31.07 will make it impossible for the Seal of Biliteracy award program go fulfill its stated purpose.

Proposed Regulations 603 CMR 31.07 for the Criteria for the Seal of Biliteracy

- (2) Criteria. To qualify for the State Seal of Biliteracy, a student must meet all graduation requirements and the criteria listed in 603 CMR 31.07(2)(a) and (b).
- (a) Demonstrate a high level of proficiency in English through one of the following:
- (i) Students in the graduating classes of 2019 and 2020 must attain a scaled score of at least 250 on the grade 10 English Language Arts MCAS administered in 2018 or earlier.
 - (ii) Students in the graduating classes of 2021 and beyond must score at the meeting or exceeding expectations performance levels on the grade 10 English Language Arts MCAS.
- (b) Demonstrate a high level of proficiency in a foreign language through one of the following:
- (i) Attaining a minimum score or level on a nationally recognized and readily available assessment approved by the Department that measures literacy in a language other than English. The Commissioner shall determine the minimum score or level, which shall be comparable to the meeting expectations performance level on the grade 10 English Language Arts MCAS. For students in the graduating classes of 2019 and 2020, the minimum score or level shall be comparable to a scaled score of 250 on the grade 10 English Language Arts MCAS administered in 2018 or earlier.
 - (ii) An alternative evidence method established by the Department in guidance.



The Language Opportunity Coalition opposes the proposed regulations 603 CMR 13.07 for the following reasons:

1] 603 CMR 31.07(2)(a) and (b): The award criteria do not follow the national guidelines for proficiency levels in English and world languages for the Seal of Biliteracy.

The national guidelines for the Seal of Biliteracy were developed in 2015 by four national professional organizations representing language educators: The American Council on the Teaching of Foreign Languages (ACTFL), the National Association of Bilingual Education (NABE), the National Council of State Supervisors for Languages (NCSFL), and TESOL International Association. These guidelines established the minimum standard for the Seal of Biliteracy award at *Intermediate-Mid* on the ACTFL Proficiency Scale (ACTFL 2012)¹. To date, 33 other states have established a state seal of biliteracy based on this standard.

The ACTFL Proficiency Guidelines are internationally recognized language proficiency standards that describe “what individuals can do with language in terms of speaking, writing, listening, and reading in real-world situations in a spontaneous and non-rehearsed context” (ACTFL 2012). The ACTFL Proficiency Guidelines are used to develop standardized language proficiency assessments in multiple languages, and the scores are used by universities to make educational decisions, and by businesses to assess language proficiency for hiring.

Guidelines for Implementing the Seal of Biliteracy (2015)

American Council on the Teaching of Foreign Languages, National Association for Bilingual Education, National Council of State Supervisors for Languages, & Teachers of English to Speakers of Other Languages International Association.

http://www.actfl.org/sites/default/files/pdfs/SealofBiliteracyGuidelines_0.pdf

Level of Language Proficiency Required

English:

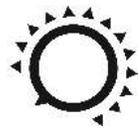
Both native and non-native speakers of English need to provide comparable evidence of English Proficiency, as determined by the state guidelines. The language performance should be demonstrated in both social and academic use of the language, in all modes of communication.

Other Languages:

Native and non-native users of a language other than English need to provide evidence of proficiency in that language. ***The minimum target level should be Intermediate Mid based on the ACTFL Proficiency Guidelines.*** The student should demonstrate proficiency in the modes of communication appropriate for that language; not all languages have all modes of communication (Interpersonal communication involving conversational speaking and listening or signed exchanges; Interpretive reading, listening, or viewing; and Presentational communication shown by creating messages for a reader, listener, or viewer through writing, speaking, or signing). The language performance should be demonstrated in both social and academic (content-based) use of the language, where possible.

States could consider a two-tier Seal of Biliteracy providing a higher option in the Advanced range. This is especially appropriate for bilingual or dual language programs. (italics added)

¹ See Appendix D: ACTFL Proficiency Guidelines 2012



The LOOK Act statute states that students should demonstrate a “high level of proficiency” in English and a foreign language to receive the award. In the context of the Seal of Biliteracy, the term “proficiency” should be understood as “language proficiency” -- as defined by the ACTFL Proficiency Guidelines (2012) -- not “proficiency” on an English Language Arts content area test such as MCAS. The multi-tiered award structure developed for the Massachusetts Seal of Biliteracy Pilot Project meets and exceeds the national guidelines outlined in *Guidelines for Implementing the Seal of Biliteracy* (ACTFL, 2012), with the highest level award made at the *Advanced-low* proficiency level.

The ACTFL language proficiency levels should be used as the starting point for determining award criteria for *all* language proficiency assessments -- MCAS, ACCESS for ELLs, and world language assessments, instead of selecting a proficiency level based solely on MCAS scores performance, which predominantly measures academic English and not the full range of linguistic competencies across multiple communicative domains and contexts.

2] 603 CMR 31.07(2)(a): The English language proficiency criteria based on 10th grade MCAS scores will unfairly exclude English learners, former English learners, and other students from receiving the award.

Based on the proposed criteria, the following groups of students will be excluded from the opportunity to earn the Seal of Biliteracy award²:

- Students who score 240-238 *Proficient* (current MCAS) or *Meeting Expectations* (Next Gen MCAS) meet the Competency Determination and can graduate, but cannot retake MCAS, and therefore will never be able to qualify for the award.
- Students who score *Needs Improvement/Partially Meeting Expectations* do not meet the Competency Determination, but can still graduate with an Educational Proficiency Plan (EPP). However, they cannot retake MCAS, and therefore will never be able to qualify for the award.
- English learners in their first year in a Massachusetts school who are not required to take 10th grade ELA MCAS, and therefore will never be able to qualify for the award.
- It is not clear if the ELA MCAS Retest is allowed under the proposed regulations. If not, then the criteria would also exclude students who score *Warning/Failing/Not Meeting Expectations* and later achieve a higher score on the MCAS Retest, as well as English learners newly arriving in the U.S. after grade 10 who take the MCAS Retest and achieve a passing score to qualify for graduation.

<p>Students Excluded by the ELA MACS Criteria</p> <p>All students – 22%</p> <p>Former English Learners – 40%</p> <p>English Learners – 68%</p> <p>Source: MA DESE, 2017 Grade 10 ELA MCAS Achievement Report</p>

To create an equitable award, there must be an alternate pathway for students to demonstrate English language proficiency in grade 12 in addition to 10th grade ELA MCAS. This recognizes that English learners will continue to develop English language proficiency during the two years before graduation and takes into account the circumstances of newcomer students arriving in high school. We recommend

² See Appendix C: Which students would qualify for the Seal of Biliteracy under English language proficiency criteria in the proposed regulation?



that students be able to demonstrate proficiency in grade 12 through ACCESS for ELLs®, the state-mandated assessment of English proficiency, as well as the ELA MCAS Retest. In addition, a portfolio assessment should be an option for world languages for which there is currently no standardized assessment, such as Vietnamese and Haitian Creole.

The statute does not require MCAS to be the only assessment, so the Department is within its authority to offer an alternative.

M.G.L. c. 69, § 1Q

The criteria shall include, *but shall not be limited to* attainment of a specified level of performance on: (i) the tenth grade English language arts exams of the Massachusetts Comprehensive Assessment System; and (ii) not less than 1 nationally recognized and readily available assessments that measure literacy in a language other than English or an equivalent alternative that the board may establish. (italics added)

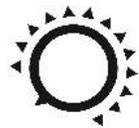
3] 603 CMR 31.07(2)(a): The language proficiency criteria do not give English Learners the same amount of time to develop language proficiency as world language learners.

World language assessments to determine eligibility for the Seal of Biliteracy award are typically administered in the 12th grade. Under the proposed regulations, demonstration of English language proficiency is required two years earlier through 10th grade ELA MCAS. This means that while English-dominant students will have until grade 12 to demonstrate proficiency in their second language, English learners will be required to demonstrate proficiency in English by grade 10, even though they have two more years to develop proficiency before graduating from high school. To create an equitable award, all students must be allowed the same amount of time to demonstrate proficiency in the new (second) language (Heineke & Davin 2018).

4] 603 CMR 31.07(2)(a) and (b): The award criteria do not implement the multi-tiered award structure developed by the Massachusetts Seal of Biliteracy Pilot Project to promote and reward long term and sustained language study.

Offering a multi-tiered award structure is recommended in the national *Guidelines for Implementing the Seal of Biliteracy* (ACTFL 2015) and is identified in research on the Seal of Biliteracy nationally as a way to create an inclusive award pathway with opportunity for diverse learners (Heineke & Davin 2018, Borowczyk et al 2018). In addition, the multi-tiered structure provides more accurate information about the level of proficiency a student has achieved, which will, for example, “allow employers to identify job candidates with the strong bilingual abilities they seek.” (Borowczyk et al 2018) Of the states for which data is available, seven other states with the Seal of Biliteracy have a multi-tiered award structure (Heineke & Davin 2018)³.

³ See Appendix E: Seal of Biliteracy Language Proficiency Criteria in Other States



With these considerations in mind, the Massachusetts Seal of Biliteracy Pilot Project developed a multi-tiered award structure through a collaborative development process that involved educators in ESL, dual language, bilingual, and world language programs⁴.

The multi-tiered award structure is designed to be an motivational and inclusive award that recognizes the language attainment of as many students as possible. One goal of the award is to motivate students to pursue language learning PK-16, and reward students long-term and sustained language learning. Another goal is to recognize and reward the native languages and linguistic assets that multilingual students bring to our schools. With a multi-tiered award structure, the awards create a pathway for celebrating language achievement as an important skill in the global economy that is attainable for many students.

The positive effects of an inclusive award are eloquently described in the article “Honoring Learners with the Seal of Biliteracy” in *Language Education*, about the Seal of Biliteracy Pilot Project in Arlington Public Schools. “From world language students to English language learners to our heritage students, the Seal has recognized and honored them for talents that were previously undervalued. And now, with Massachusetts’ official stamp of approval, that value will deepen and expand.” (Ritz 2018, p.30)

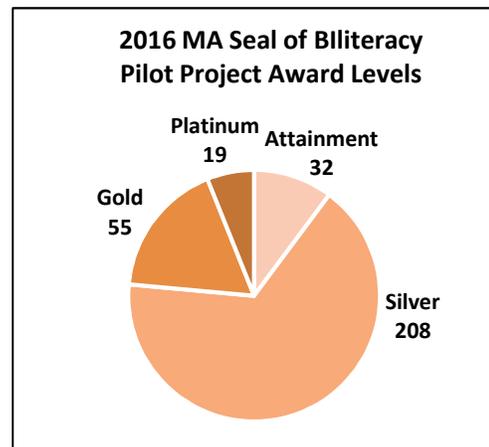
The multi-tiered award structure recognizes that students enter our schools at different ages with different levels of English, native, and world language proficiency. It also recognizes the reality that our students do not have equal access to opportunities to develop bilingualism and biliteracy, depending on the language instructional programs offered by a particular school or school district. We want to recognize and celebrate achievements in language learning all along the pathway to proficiency, not create an elitist award that is inequitable and unattainable to most students.

We hope that students who receive a Biliteracy Attainment Award in 5th or 8th grade will be motivated to continue work toward a higher proficiency award at high school graduation. We hope that English learners will feel that bilingualism and biliteracy in their native language is valued in school and beyond. We hope that world language learners who begin serious language study in high school, when language instruction is available, will have the opportunity to earn an award. In short, we hope to see an increase in language study for *all* students across the Commonwealth, and that students’ commitment to language study and learning will be both rewarded and recognized by the State Seal of Biliteracy

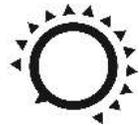
Language Instructional Programs in Massachusetts Public Schools

Only 20 dual language programs
(Multi-State Association for Bilingual Education, 2017)

Only 26% of students have access to world language instruction
(American Councils for International Education, 2017)



⁴ See Appendix A: History of the Massachusetts Seal of Biliteracy Pilot Project and Appendix B: Multi-tiered Award Criteria for the Massachusetts Seal of Biliteracy Pilot Project.



Note on districts currently participating in the Seal of Biliteracy Pilot Project:

In Spring 2018, almost 100 school districts have committed to participating in the Seal of Biliteracy awards, and we anticipate thousands of awards will be given across the state. There are also thousands of students who will graduate in 2019 and 2020, who have already taken 10th grade MCAS and believe they are eligible for the award based on the standards in the Pilot Project. A change in criteria will unfairly affect deserving students who have been working in good faith towards earning the award. We urge the Department not to change the rules of the award that were established, based on the national guidelines, through a collaborative process by ESL, bilingual, dual language and world language educators, and have been operating successfully for three years in Massachusetts.

SUMMARY OF RECOMMENDATIONS

- Establish award criteria that is based on the language proficiency level of *Intermediate-Mid* and higher on the ACTFL proficiency scale, consistent with the national standard defined in *Guidelines for implementing the Seal of Biliteracy* (ACTFL 2015).
- Establish multi-tiered award criteria that implements the award structure developed by the Massachusetts Seal of Biliteracy Pilot Project to promote and reward long term and sustained language study.
- Establish award criteria that is equitable for all students. 1) Ensure that English learners and world language learners have the same amount of time (until the end of grade 12) to demonstrate language proficiency; and 2) Allow assessments of English proficiency in addition to grade 10 English Language Arts MCAS, including ACCESS for ELLs and the ELA MCAS Retest.
- Allow students graduating in 2019 and 2020 from Massachusetts school districts currently participating in the Seal of Biliteracy Pilot Project to receive the award based on the criteria established in the Pilot Project.

The Language Opportunity Coalition and members of the Seal of Biliteracy Pilot Project are ready to assist the Department in developing an award policy to ensure equity and opportunity for all students pursuing language study.



REFERENCES & SELECTED LINKS

Massachusetts Seal of Biliteracy Pilot Project Guidelines

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APPENDIX

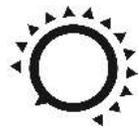
Appendix A: History of the Massachusetts Seal of Biliteracy Pilot Project (page 10)

Appendix B: Multi-Tiered Award Criteria for Massachusetts Seal of Biliteracy Pilot Project (page 11)

Appendix C: 2017 10th Grade MCAS Data: Which students would qualify for the Seal of Biliteracy under English language proficiency criteria in the proposed regulation? (page 12)

Appendix D: ACTFL Proficiency Guidelines 2012 (page 13-14)

Appendix E: Seal of Biliteracy Award Language Proficiency Criteria in Other States (page 15)



Appendix A: History of the Massachusetts Seal of Biliteracy Pilot Project

The Seal of Biliteracy (SoBL) Pilot Project has been coordinated by the Language Opportunity Coalition from 2014 until the present.

The SoBL Pilot Project began as we awaited approval of the State Seal of Biliteracy Award by the state legislature. When planning for the project began in 2014, only 9 other states had approved State Seal of Biliteracy legislation. Today, Massachusetts is one of 33 states that have a Seal of Biliteracy award.

The award criteria for the SoBL Pilot Project is based on the national standards established in 2015 *Guidelines for implementing the Seal of Biliteracy*, published by four national professional associations for language instructors (American Council on the Teaching of Foreign Languages, National Association for Bilingual Education, National Council of State Supervisors for Languages, & TESOL International Association), plus consideration of policies in other states.

Development of the award implementation process and Seal of Biliteracy TOOLKIT during the SoBL Pilot Project was a collaborative process, involving educators in ESL, Dual Language, Bilingual, and World Language programs in school districts across Massachusetts.

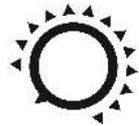
- 2014-15:
 - Developed criteria for the award and began planning for implementation.
 - Established a workgroup of 50 educators to help districts and schools begin the pilot.
 - Developed the Seal of Biliteracy TOOLKIT outlining award criteria for the pilot and sharing resources for implementation.
- 2015-16 school year:
 - 10 schools/districts made over 300 awards.
 - TOOLKIT revised with input from the field on the first year of the pilot.
- 2016-17 school year
 - 17 schools/districts made over 900 awards.
 - TOOLKIT revised with input from the field on the second year of the pilot.
- 2017-18: Final year of the pilot – Almost 150 educators from 100 school districts are participating in the workgroup.

Find out more at:

<https://languageopportunity.org/seal-of-biliteracy-pilot-project/>



2016 Seal of Biliteracy Award Ceremony
Muñiz Academy, Boston Public Schools

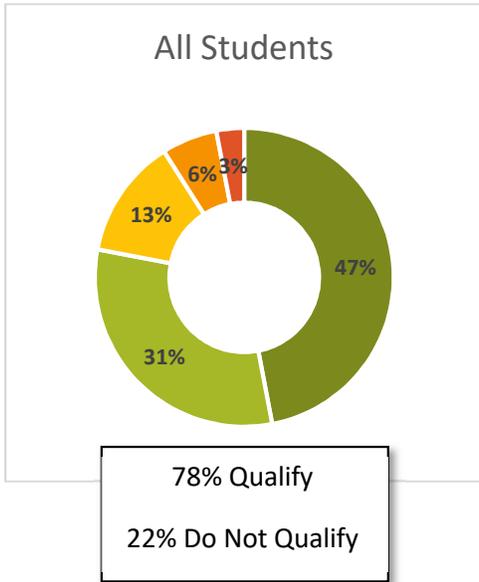


Appendix B: Multi-Tiered Award Criteria for Massachusetts Seal of Biliteracy Pilot Project

Award Level	ACTFL Proficiency Level	English Proficiency Assessment	World Language Assessment
Biliteracy Attainment Award	Intermediate-low proficiency in two languages	Partially Meeting Expectations (higher end) or Proficient score of MCAS ELA And/or For ELLs, WIDA ACCESS ELD Level 3.5 or higher	Intermediate-mid on a world language assessment OR Portfolio assessment (for languages with no standardized test)
Silver Seal Award	Intermediate-mid proficiency in two languages	Meeting Expectations score of MCAS ELA And/or For ELLs, WIDA ACCESS ELD Level 4 or higher	Intermediate-mid on a world language assessment OR Portfolio assessment
Gold Seal Award	Intermediate-high proficiency in two languages	Meeting Expectations score of MCAS ELA And/or For ELLs, WIDA ACCESS ELD Level 5 or higher	Intermediate-high on a world language assessment OR Portfolio assessment
Platinum Seal Award	Advanced-low or higher proficiency in two languages	Exceeding Expectations or Advanced score of MCAS ELA And/or For ELLs, WIDA ACCESS ELD Level 6	Advanced-low on a world language assessment OR Portfolio assessment

Adapted from: Language Opportunity Coalition (2018). *Massachusetts Seal of Biliteracy Pathway Awards TOOLKIT*.
https://languageopportunity.files.wordpress.com/2018/02/2017_toolkit_sealofbiliteracy-revjan2018.pdf

APPENDIX C: 2017 10th Grade MCAS Data: Which students would qualify for the Seal of Biliteracy under English language proficiency criteria in the proposed regulation?

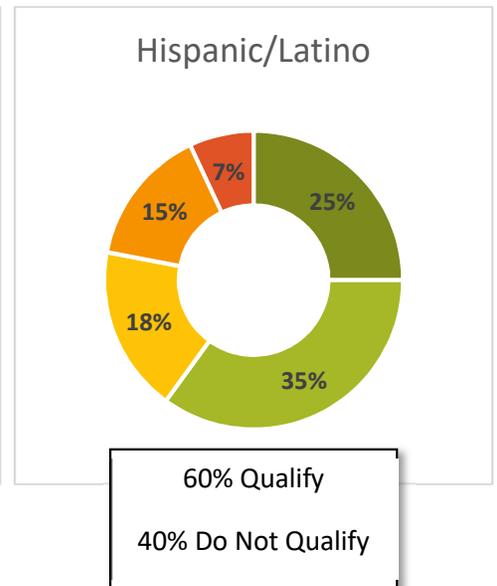
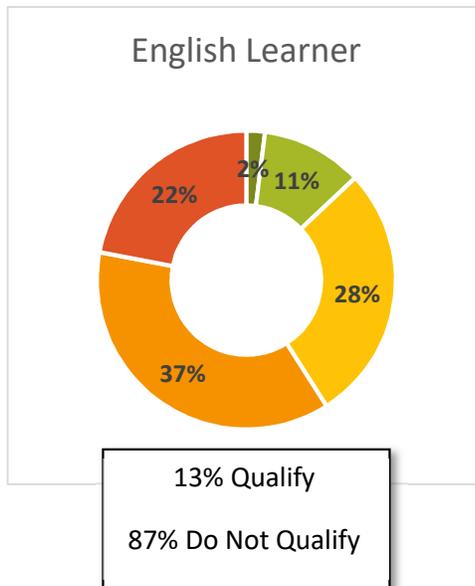
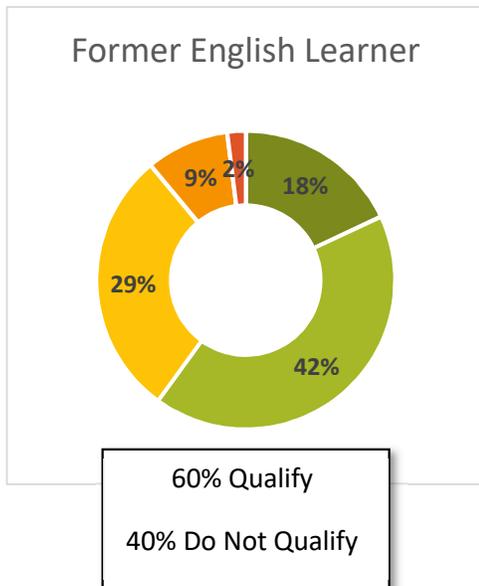


Meet English Proficiency Criteria Under Proposed Regulations:

- **Advanced:** Students can graduate and meet the English proficiency criteria to receive the Seal of Biliteracy Award.
- **Proficient with a score of 250+:** Students can graduate and meet the English proficiency criteria to receive the Seal of Biliteracy Award.

Do NOT meet English Proficiency Criteria Under Proposed Regulations:

- **Proficient with a score of <250:** Students can graduate but can NEVER qualify for the Seal of Biliteracy Award because they cannot retake MCAS.
- **Needs Improvement:** Students can graduate with an Educational Proficiency Plan (EEP), but can NEVER qualify for the Seal of Biliteracy Award because they cannot retake MCAS.
- **Warning/Failing:** Students can retake MCAS, so they can potentially meet the criteria if the MCAS Retest is allowed.



Source: Massachusetts Department of Elementary and Secondary Education, 2017 MCAS Achievement Results.

ACTFL

AMERICAN COUNCIL ON THE TEACHING OF FOREIGN LANGUAGES

ACTFL PROFICIENCY GUIDELINES 2012

Welcome to the ACTFL Proficiency Guidelines 2012 online. Here you will find the most current version of the ACTFL Proficiency Guidelines for Speaking, Writing, Listening, and Reading made interactive through the inclusion of glossed terms and multimedia exemplars. You can explore the Guidelines by skill or by level, listen to and read samples in English that represent abilities at each of the major proficiency levels.

Download the complete text of the ACTFL Proficiency Guidelines 2012 document in a PDF format.

Previous versions of the Guidelines are available here: [1986](#), [1999](#), [2001](#).

Download the Guidelines Pyramid suitable for printing: [8.5 x 11](#) (PDF) or [11 x 17](#) (PDF).

Purchase the [Oral Proficiency Levels in the Workplace](#) 24 x 36 poster or [download](#) it for printing (PDF).

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GENERAL PREFACE TO THE ACTFL PROFICIENCY GUIDELINES 2012

The ACTFL Proficiency Guidelines are a description of what individuals can do with language in terms of speaking, writing, listening, and reading in real-world situations in a spontaneous and non-rehearsed context. For each skill, these guidelines identify five major levels of proficiency: Distinguished, Superior, Advanced, Intermediate, and Novice. The major levels Advanced, Intermediate, and Novice are subdivided into High, Mid, and Low sublevels. The levels of the ACTFL Guidelines describe the continuum of proficiency from that of the highly articulate, well-educated language user to a level of little or no functional ability.

These Guidelines present the levels of proficiency as ranges, and describe what an individual can and cannot do with language at each level, regardless of where, when, or how the language was acquired. Together these levels form a hierarchy in which each level subsumes all lower levels. The Guidelines are not based on any particular theory, pedagogical method, or educational curriculum. They neither describe how an individual learns a language nor prescribe how an individual should learn a language, and they should not be used for such purposes. They are an instrument for the evaluation of functional language ability.

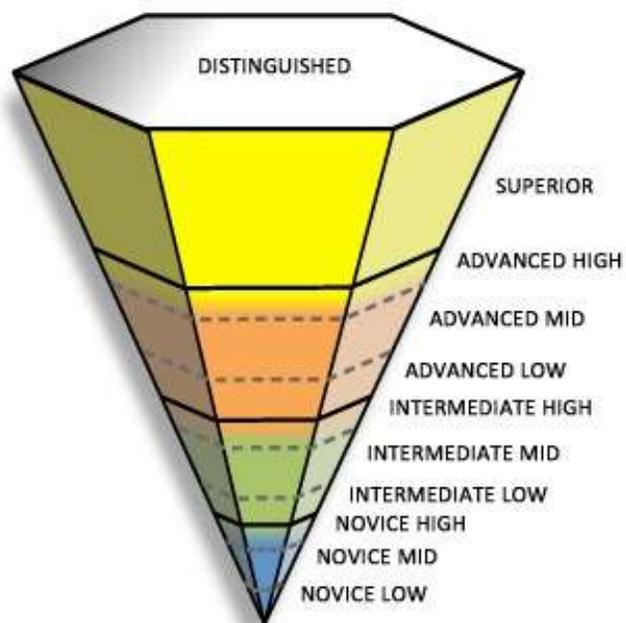
The ACTFL Proficiency Guidelines were first published in 1986 as an adaptation for the academic community of the U.S. Government's Interagency Language Roundtable (ILR) Skill Level Descriptions. This third edition marks the third edition of the ACTFL Proficiency Guidelines includes the first revisions

of Listening and Reading since their original publication in 1986, and a second revision of the ACTFL Speaking and Writing Guidelines, which were revised to reflect real-world assessment needs in 1999 and 2001 respectively. New for the 2012 edition are the addition of the major level of Distinguished to the Speaking and Writing Guidelines, the division of the Advanced level into the three sublevels of High, Mid, and Low for the Listening and Reading Guidelines and the addition of general level description at the Advanced, Intermediate, and Novice levels for all skills.

Another new feature of the 2012 Guidelines is their publication online, supported with glossed terminology and annotated, multimedia samples of performance at each level for Speaking and Writing, and examples of oral and written texts and tasks associated with each level for Reading and Listening.

The direct application of the ACTFL Proficiency Guidelines is for the evaluation of functional language ability. The Guidelines are intended to be used for global assessment in academic and workplace settings.

However, the Guidelines do have instructional implications. The ACTFL Proficiency Guidelines underlie the development of the ACTFL Performance Guidelines for K-12 Learners (1998) and are used in conjunction with the National Standards for Foreign Language Learning (1996, 1998, 2006) to describe how well students meet content standards. For the past 25 years, the ACTFL Guidelines have had an increasingly profound impact on foreign language teaching and learning in the United States.

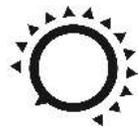


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Appendix E: Seal of Biliteracy Award Language Proficiency Criteria in Other States

National Minimum Standard = Intermediate-Mid

	Intermediate Low	Intermediate Mid	Intermediate High	Advanced Low	Advanced Mid
Massachusetts Pilot Project	Attainment	Level 1: Silver	Level 2: Gold	Level 3: Platinum	
Arizona					
Delaware		Level 1: Gold		Level 2: Diamond	
D.C.					
Georgia					
Hawaii					
Illinois	Commendation		Level 2: Gold		
Indiana					
Kansas		Level 1: Gold		Level 2: Platinum	
Louisiana					
Maryland					
Minnesota			Level 1: Gold	Level 2: Platinum	
Missouri		Level 1		Level 2: Distinguished	
Nevada					
New Jersey					
New Mexico					
New York					
North Carolina					
Ohio					
Oregon					
Rhode Island		Level 1: Silver		Level 2: Gold	
Texas					
Virginia					
Washington					
Wisconsin			Level 1		Level 2: Distinguished

Source: Heineke & Davin, 2018