

**The Struggle with Aligning WIDA-Based ESOL Programs to the Science of
Reading: A Call to Action for WIDA**

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Vignette

During a routine classroom observation, an assistant principal observed culturally and linguistically diverse students facing challenges in sounding out words and recognizing patterns in word formation. She met with the school's ESOL teachers to discuss how they could support the reading development of these students, particularly in areas such as phonemic awareness, phonics, and decoding. During the meeting, the assistant principal asked the ESOL teachers to collaborate with the classroom teachers and to plan together for supporting students during small group time. One experienced ESOL educator, however, expressed that her role was to focus on language comprehension skills as outlined in the WIDA (2020) standards, and should not address phonics and decoding skills. That is the role of the ELA teacher. The assistant principal found the teacher's comments a little puzzling and wanted to better understand the distinctions in roles and responsibilities. To gain clarity, the assistant principal sought the expertise of their district ESOL specialist. She was surprised to learn that the ESOL specialist confirmed the teacher's claim: teaching decoding skills is not explicitly part of WIDA's (2020) framework for teaching reading. After reviewing the ESOL teacher's lesson plans, the ESOL specialist verified the lessons were purposeful and aligned with the WIDA (2020) standards. At that time, it became clear to the administrator that the ESOL teacher's role is to provide oral language support in areas of literacy as outlined by the WIDA (2020) standards, which do not include phonetic instruction. The ESOL specialist left the meeting feeling she had shared valuable insights about ESOL education, while the assistant principal felt constrained in her ability to plan instruction for these students.

Months later, the assistant principal in a new role as district reading specialist was responsible for implementing changes mandated by the Georgia Department of Education concerning structured literacy training and dyslexia screening procedures. According to the new Georgia law—SB48—students who do not pass the literacy screener must be placed on a reading intervention program. Recognizing the dual risk of over-identifying multilingual learners (MLs) as dyslexic and the possibility of failing to identify MLs who genuinely have characteristics associated with dyslexia, the new reading specialist sought a balanced approach. To develop a support plan for appropriately screening multilingual students, she reached out to the ESOL specialist again. Because dyslexia identification relies heavily on word recognition skills, which are neither taught nor assessed in the ESOL program under WIDA guidance, the ESOL specialist initially found it challenging to contribute meaningfully to the discussion. They found themselves unable, yet again, to have a collaborative conversation with one another. They were coming from different perspectives and had completely different approaches to the same problem. The reading specialist simply asked, "Then how can ESOL teachers help a non-reader?" The ESOL specialist paused for a very long time... and that's when the real conversation started.

Executive Summary

WIDA-based ESOL programs face significant challenges in aligning with state literacy laws that emphasize Structured Literacy and the Science of Reading. WIDA-based ESOL programs show gaps in (1) standards-based instructional practices, (2) comprehensive assessment, and (3) setting language expectations. To bridge these gaps, it is imperative for WIDA to explicitly integrate phonological awareness and word recognition skills into their standards, proficiency level descriptors, and assessments. This integration would ensure that ESOL programs can better support multilingual learners by aligning their instructional approaches with the Structured Literacy training that educators are receiving under recent literacy legislation. Phonological awareness and decoding are foundational as addressed in Structured Literacy. By addressing these critical areas, WIDA can provide a more comprehensive framework that not only aligns with state mandates but also empowers ESOL educators to effectively support the literacy development of all students.

Background

Literacy Laws

As of July 2023, 41 U.S. states and The District of Columbia have enacted laws and policies regarding literacy, covering aspects such as teaching methods, assessment practices, and curriculum guidance (American Federation of Teachers, 2023). These laws underscore a nationwide commitment to improving reading outcomes for *all* students, particularly those who face the greatest challenges. The legislative changes in literacy laws have been driven by the need to adopt evidence-based instructional methods from Structured Literacy¹. This approach aims to address persistent issues with reading proficiency and support struggling readers through high quality tier one research, early identification, and targeted interventions. Therefore, to effectively address these challenges, literacy laws incorporate several essential components, which often consist of some of the following four key features:

- **evidence-based instruction** (i.e., phonics-based approaches, direct instruction in phonemic awareness, and explicit teaching of vocabulary and comprehension strategies),

¹ “The term ‘Structured Literacy’ is not designed to replace Orton Gillingham, Multi-Sensory, or other terms in common use. It is an umbrella term designed to describe all of the programs that teach reading in essentially the same way. In our marketing, this term will help us simplify our successes. ‘Structured Literacy’ will help us sell what we do so well” [Malchow, 2012, n.p., as cited in Gabriel (2018)].

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- **early assessment and intervention** (i.e., regular assessments identify struggling readers early, allowing for targeted interventions),
- **professional development for teachers** (i.e., ongoing professional development equips teachers with the latest instructional strategies, including differentiation for multilingual learners), and
- **adoption of high-quality curriculum materials that align with Science of Reading–related research.**

These comprehensive measures are designed to create a more consistent and effective approach to literacy education nationwide. By addressing these four key components, literacy laws aim to ensure that all students could become proficient readers, thereby setting them up for long-term academic and personal success.

Georgia–House Bill 538

House Bill 538, also known as the "Georgia Early Literacy Act," was enacted to amend Title 20 of the Official Code of Georgia Annotated, focusing on improving early literacy instruction and outcomes. The bill was passed by both the House and Senate, with the House voting in favor on March 29, 2023, and the Senate on March 30, 2023. This bill addresses the four key components that form the foundation of literacy laws nationwide, prompting the education system in Georgia to rethink, adapt, and change how reading instruction is delivered and conceptualized. In essence, the bill mandates the Department of Early Care and Learning to provide developmentally appropriate, evidence-based literacy instruction training for certain childcare providers and requires the State Board of Education to establish uniform standards for measuring literacy. Additionally, the bill directs the approval of high-quality instructional materials for kindergarten through third grade and mandates the use of universal reading screeners multiple times a year to identify and support struggling readers.

House Bill 538 stipulates that all public school kindergarten through third grade teachers must complete training on the Science of Reading, Structured Literacy, and foundational literacy skills. Local boards of education are required to implement tiered reading intervention plans for students with significant reading deficiencies and to report results to parents and the Department of Education. House Bill 538 emphasizes professional development for teachers, the use of high-quality, culturally responsive curriculum materials, and the importance of family and community

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engagement in literacy education. The implementation of these measures aims to ensure all students read on grade level by the end of third grade and create a workforce-ready citizenry.

Georgia–Senate Bill 48

Senate Bill 48 (SB 48) aims to enhance the identification and support of students in kindergarten through third grade who exhibit characteristics of dyslexia. It mandates the State Board of Education to create policies for identifying and assisting these students and requires the Department of Education to provide a dyslexia informational handbook to local school systems (Georgia Department of Education, 2024). The bill outlines provisions for ongoing professional development for teachers, a pilot program to evaluate early reading assistance programs, and universal screening for dyslexia starting in kindergarten. Additionally, it establishes requirements for a teaching endorsement in dyslexia and incorporates dyslexia education into teacher preparation programs. The bill also calls for data collection and reporting on the effectiveness of these initiatives.

Foundational Tenets of Literacy Laws–Science of Reading and Structured Literacy

The growing support for literacy laws, and as seen in House Bill 538 and within Senate Bill 48, underscores the importance of understanding the foundational principles of the Science of Reading and Structured Literacy—two academic concepts that have influenced the legislative changes. The Reading League (n.d.) defines the *Science of Reading* as a vast, interdisciplinary body of research that is scientifically based and addresses reading/writing and literacy practices. According to the National Center on Improving Literacy (2022), the Science of Reading is not a curriculum, program, intervention, or product that a school or district can procure. Instead, it is an interdisciplinary collection of research from fields such as cognitive psychology, neuroscience, education, and linguistics. This research includes teaching phonemic awareness, phonics, fluency, vocabulary, and comprehension.

Structured Literacy, as described by Gabriel (2018) involves teaching a comprehensive range of literacy skills in a systematic and explicit manner. These skills include, at a minimum, phonology, sound-symbol association, syllables, morphology, syntax, and semantics. More importantly, Structured Literacy approaches are explicit, systematic, cumulative, diagnostic, and responsive. 'Explicit' means that concepts are directly taught and practiced (Lexia, 2022).

Structured Literacy's systematic nature ensures that instruction follows a logical sequence, building on previously taught concepts and progressively increasing in complexity.

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This cumulative approach helps students develop a solid foundation in literacy skills. Additionally, the diagnostic aspect of Structured Literacy involves continuous assessment to identify students' needs and adjust instruction accordingly. This responsiveness ensures that teaching methods are tailored to support each student's learning journey effectively. The emphasis on these foundational tenets within literacy laws reflects a commitment to adopting evidence-based instructional practices that address the diverse needs of all learners. By incorporating the Science of Reading and Structured Literacy principles, these laws establish a comprehensive framework primarily focused on phonics instruction. While they significantly enhance reading proficiency and academic success, they may not fully address other crucial aspects such as executive function, motivation, and cultural influences. Nevertheless, the implementation of these laws ensures that every student is provided with the opportunity to achieve reading proficiency.

WIDA states face the challenge of aligning their academic standards with new literacy laws focused on the Science of Reading and Structured Literacy. Concurrently, the Office of English Language Acquisition (OELA) requires them (US DOE, OELA, 2016) to align their English Language Development (ELD) standards with academic standards. Among the 41 U.S. states and the District of Columbia that have enacted literacy laws and policies, 33 are members of the WIDA Consortium.

WIDA and ESOL Programs

WIDA, based at the University of Wisconsin-Madison, supports multilingual learners from PreK through grade 12 by providing a comprehensive framework of language development standards and assessments. WIDA's resources help educators design instruction that integrates language and content learning, fostering academic success for students who are learning in multiple languages. One key resource is the annual ACCESS for ELLs assessment (Assessing Comprehension and Communication in English State-to-State for English Language Learners) (WIDA 2024), which measures English language proficiency in Reading, Writing, Speaking, and Listening.

The results of the ACCESS for ELLs test serve multiple purposes. They provide evidence for program accountability in accordance with federal education laws, helping schools and districts meet state accountability objectives for increasing English language proficiency of English Language Learners (WIDA, 2020). Schools can then track student progress over time,

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especially for newly arrived students in their first year within an ESOL program. Within the classroom spaces, educators can use the results to guide curriculum development, classroom instruction, and assessment, focusing on specific language domains that students need to improve. In some states, like Georgia, the scores are used to determine when students have attained English language proficiency according to each district criteria. Thus, teachers, administrators, and policymakers are encouraged to use these scores as aids in decision-making, always considering them in conjunction with other relevant information about students and programs (WIDA, 2020).

The WIDA Proficiency Level Descriptors (PLDs), published with the 2020 Standards Framework, are another critical resource. They allow teachers to use ACCESS scores to set language expectations and provide a comprehensive description of multilingual learners' progress in both interpretive and expressive language skills across six levels of English language proficiency, from PL1 to PL6. Furthermore, the PLDs assist educators in examining Language Expectations, which guide educators in teaching content-driven language and emphasize what students should be able to achieve with language in various contexts rather than focusing solely on structural components. By referencing the PLDs, educators can better understand how students at different stages of English language learning might engage with the same language and content learning goals enabling them to provide more targeted and effective multimodal supports and differentiated scaffolding for multilingual learners.

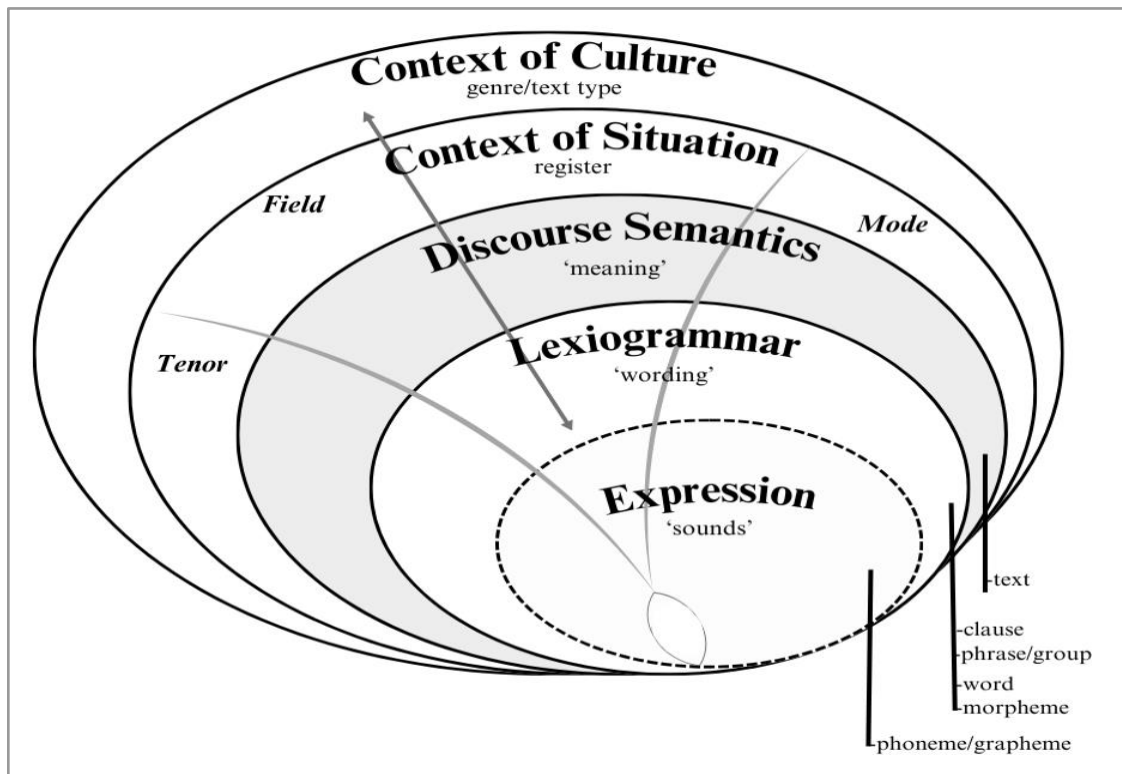
WIDA and Theory on Language–SFL (Systemic Functional Linguistic) Perspective

By grasping WIDA's theoretical framework, educators and policymakers can better understand, implement, and advocate for effective language development practices that align with WIDA's standards and assessments. WIDA's framework is deeply rooted in Systemic Functional Linguistics, using its principles to inform the teaching of academic language and to enhance the educational experiences of multilingual learners. According to WIDA (2020) “In this theoretical tradition, language is defined as a resource for making meaning rather than as a set of rules for ordering isolated grammatical structures. Language offers a dynamic set of tools that can be used in the service of learning disciplinary concepts and practices (Schleppegrell, 2013). This theoretical perspective assumes that we use language for particular purposes, with particular audiences, and in particular sociocultural contexts” (p. 359) (See Figure 1 below.)

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Figure 1 below illustrates Halliday's Stratified Model of Systemic Functional Linguistics, which organizes language into different levels of abstraction. At the core of the model is "Expression," representing the basic sounds (phonemes) and graphemes (letters) of language. *This foundational level is crucial because it forms the building blocks for all higher levels of language structure and meaning. Without a solid understanding of phonemes and graphemes, it becomes challenging to grasp more complex language elements.* Surrounding this is "Lexicogrammar," which encompasses the 'wording' of language, including morphemes (smallest meaning units), words, phrases, and clauses. Beyond this is "Discourse Semantics," which deals with the 'meaning' conveyed through language at the level of text. The outer layers of the model include the "Context of Situation" and "Context of Culture," which are essential for understanding language use. The "Context of Situation" includes the variables of field (the subject matter), tenor (the relationships between participants), and mode (the channel of communication). The broadest layer, the "Context of Culture," encompasses the broader cultural norms and genre or text type. This layered approach highlights how language operates on multiple levels, from basic sounds to complex social and cultural contexts.

Figure 1. Stratified Model of SFL



Halliday's Stratified Model of SFL Based on Martin & Matthiessen, 1991.

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By integrating SFL into its framework, WIDA helps educators to see language not just as a set of rules, but as a powerful means for students to engage with and understand academic content, interact with peers, and express their ideas effectively with various cultural and situational contexts. This understanding is pivotal in developing instructional strategies that are responsive to the needs of multilingual learners, ensuring they can achieve both language proficiency and academic success.

Description of the Problem

Phonological instruction, such as decoding or phonemic awareness, which are crucial for early reading development (Boyer & Ehri, 2011; Castiglioni-Spalten & Ehri, 2003; Chen, Irey, & Cunningham, 2018; Ehri, 2020; Hatcher, Hulme & Snowling, 2004; Martínez, 2011; Rehfeld et al., 2022) are missing from WIDA’s ELD Standards Framework, Proficiency Level Descriptors (PLDs), and assessments. This gap means that while the WIDA framework supports overall language proficiency, it does not address the foundational skills required for word recognition and phonics, and thus leads to confusion and misalignment with literacy laws. In the following sections, we will explore how this gap impacts instruction, curriculum/resources alignment, comprehensive assessment, and intervention, shedding light on the challenges and implications for educators and students alike.

Instruction

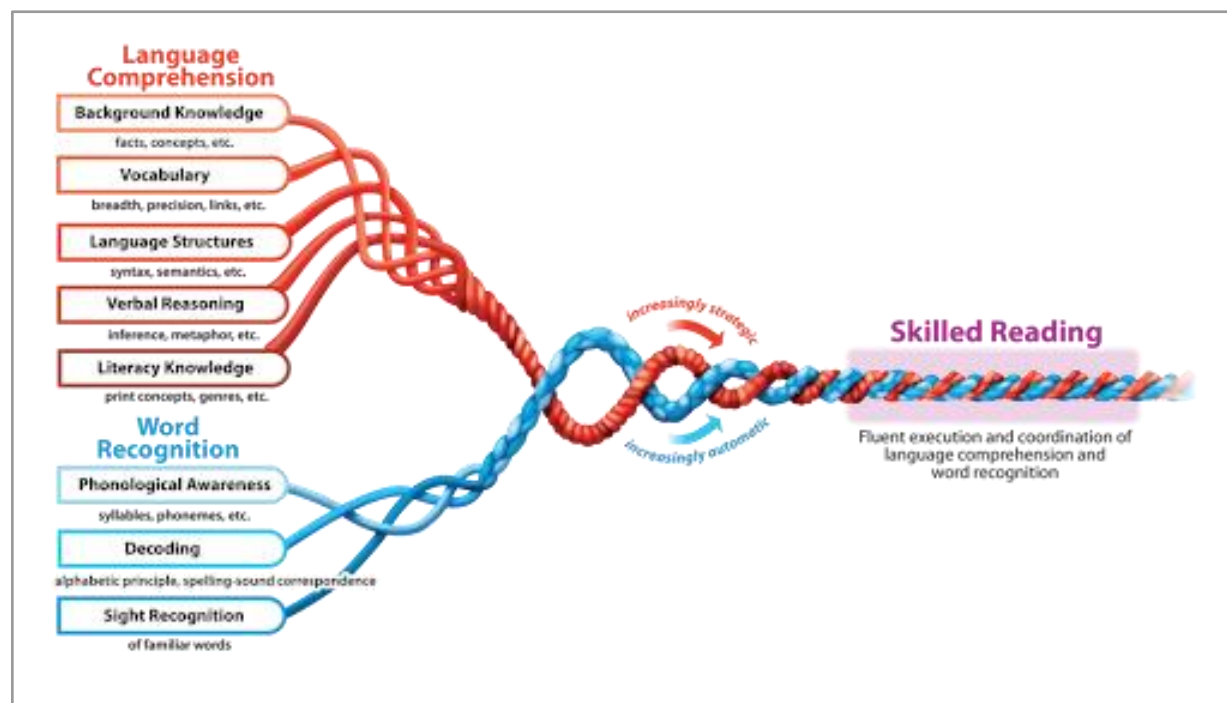
Guiding Question: Are instructional practices for multilingual learners in Georgia aligned to the Science of Reading, Structured Literacy, and foundational literacy skills?

In Georgia, the instructional role of the teacher in a classroom is guided by established standards. Classroom teachers are responsible for teaching the Georgia Standards of Excellence (<https://www.georgiastandards.org/>) for their specific grade level and content area. Similarly, ESOL teachers are required to use WIDA standards *alongside* the Georgia Standards of Excellence. Although both sets of standards include literacy guidelines, there are significant differences between them.

Understanding Literacy Development: Scarborough’s Reading Rope

To further understand these differences and the intricacies of literacy development, we can refer to Scarborough’s (Scarborough, 2001) Reading Rope. This model offers a detailed visual representation of the complexities involved in reading development, showing how various strands of skills intertwine to support proficient reading (see Figure 2).

Figure 2. Scarborough’s (2001) Reading Rope



Scarborough’s “Rope” Model from Handbook of Early Literacy Research, (Neuman & Dickinson, 2001).

Alignment and Gaps: Georgia’s ELA Standards and WIDA Standards

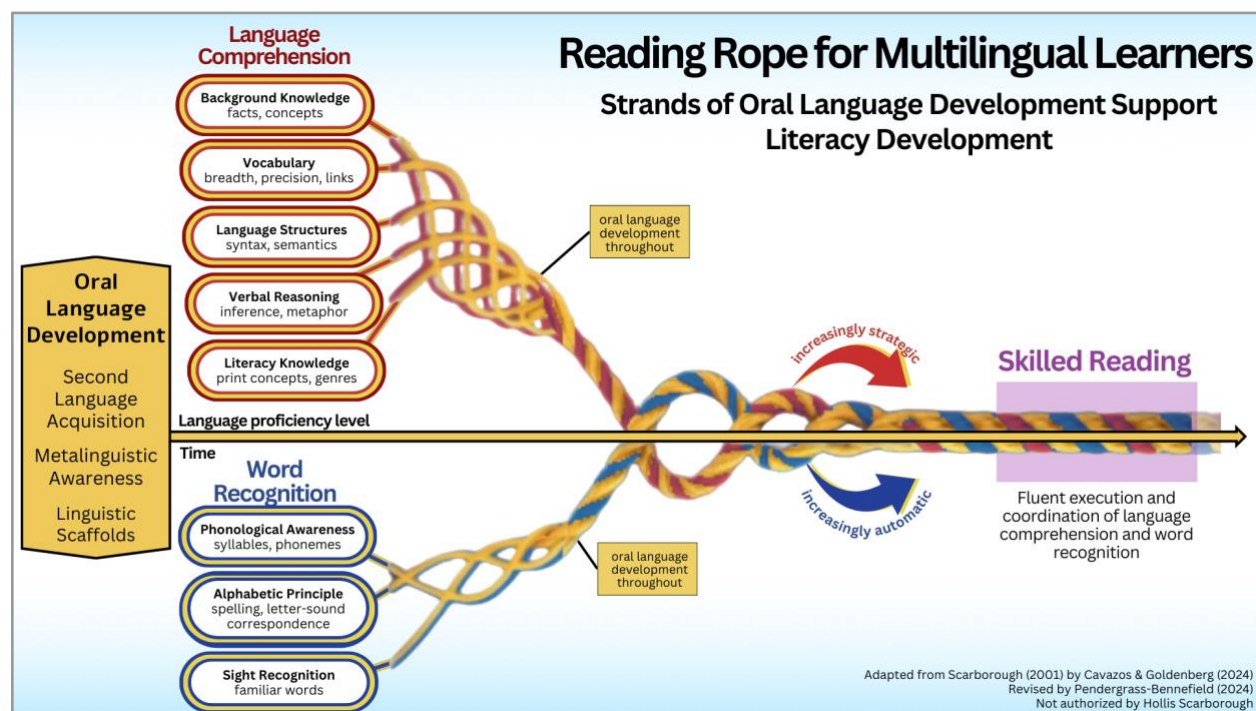
In Georgia, early grade ELA standards (Georgia Standards of Excellence, n.d.), new literacy legislation (Georgia House Bill 538, 2023), and curricula aligned with structured literacy ensure comprehensive coverage of all critical literacy areas defined in Figure 2. Consequently, ELA teachers address all areas of the two major strands of the Reading Rope: language comprehension and word recognition skills. ESOL educators in Georgia, who develop lessons that align with the 2020 WIDA ELD Standards Framework, primarily address the language comprehension strands, as indicated in the upper strands of Figure 1. According to the Structured Literacy training modules in Georgia, Ilk, Whitney, and Motes (2022) emphasize that “Both components of reading—word recognition and language comprehension—should be addressed in instruction... [and] assessments should address each component of reading” (p. 75). *However, WIDA standards do not directly encompass linguistic elements smaller than a word, leaving out key aspects of word recognition such as syllables, phonemes, the alphabetic principle, and spelling-sound correspondence.* As a result, the WIDA 2020 Standards Framework does not

fully align with Georgia’s ELA standards, or the Structured Literacy training required under House Bill 538.

Reading Rope for Multilingual Learners

The adapted version of Scarborough’s Reading Rope for multilingual learners, as illustrated by Cavazos and Goldenberg (2024) and presented by Cavazos at a professional learning workshop in Georgia on June 10, 2024, asserts that oral language development should be integrated into every strand of reading competence.

Figure 3. Reading Rope for Multilingual Learners



Note. Image used with permission from Cavazos and Goldenberg, as confirmed through personal correspondence on September 18, 2024.

In this adaptation, represented by the yellow rope, oral language takes a leading role in the literacy development of multilingual learners. ESOL teachers should ideally lead in providing oral language instruction for ELs across all literacy elements. *However, using the WIDA ELD (2020) standards, oral language instruction is limited to the upper section of Figure 3, the language comprehension strands, as there are no word recognition based ELD standards. This limitation means that in WIDA states, the comprehensive integration depicted in the adapted Reading Rope cannot be fully realized in classrooms.* Neither ESOL nor ELA teachers have standards for developing the oral language of word recognition, resulting in these skills often

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being neglected and critical L1 to L2 connections remaining unmade. This highlights the necessity for ESOL instruction to also address word recognition, as providing oral language instruction for word recognition is crucial.

Integrating WIDA Standards with Georgia’s Standards of Excellence

Given this context, it becomes evident how WIDA standards are used *alongside* Georgia’s Standards of Excellence. For instance, WIDA’s ELD-SI.K-2.Inform standard requires students to “describe characteristics, patterns, or behavior.” An ESOL teacher might focus on this language comprehension strategy while also addressing Georgia ELA Standard ELAGSE1RL4, which asks students to identify words and phrases in stories or poems that suggest feelings or appeal to the senses. These standards can be effectively integrated because they target similar skill areas, specifically the upper language comprehension strands of Scarborough’s Reading Rope (see Figure 3). However, WIDA published a disclaimer in Section 2 of the WIDA (2020) Standards Framework, stating that these ELD standards cannot enumerate most of the language needed in the classroom. (See Figure 4. Screenshot of ‘What the WIDA ELD Standards Framework is and What is Not’.) This statement further emphasizes that the Standards Framework should be paired with a content-rich curriculum and effective pedagogical approaches (WIDA, 2020).

Figure 4. Screenshot of ‘What the WIDA ELD Standards Framework is and What is Not.’

The WIDA ELD Standards Framework is	The WIDA ELD Standards Framework is NOT intended to be
<ul style="list-style-type: none">• A description of clear and measurable goals for language learning represented by<ul style="list-style-type: none">• Language Expectations for interpretive and expressive modes of communication• Grade-level cluster PLDs of what multilingual learners can do at consecutive language proficiency levels• A resource for state, district, and school accountability• A guide for informing the design of linguistically and culturally sustaining curriculum, instruction, and assessment• A central component of the comprehensive WIDA research-based system of language standards, assessment, and professional learning	<ul style="list-style-type: none">• Statements of grade-level knowledge and skills• A prescriptive document to be enacted without consideration for the local setting• A de facto curriculum or course of study• Specific lessons associated with units of learning with a series of language objectives• A step-by-step process for teaching and learning• An endorsement for any particular language pedagogy• A form of evaluation or a basis for grading• A compendium of academic content standards and disciplinary practices• Used in isolation, independent of grade-level content

Note. This screenshot was taken in September 2024 from WIDA (2020) p. 35.

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Nonetheless, Title I of the Every Student Succeeds Act (2015) (ESSA) mandates that English language proficiency standards established by states align with the state academic standards. The development of ELP standards should be guided by both theory and research (Council of Chief State School Officers, 2012). "... All state ELP standards ought to be firmly grounded in a validated research based theory that reflects best practices regarding child and adolescent second language acquisition" (Council of Chief State School Officers, 2012, p. 5).

When ELD standards exhibit substantial gaps that prevent them from being effectively integrated with many required content standards for literacy, they fall short of functionality. Consequently, one could argue that WIDA standards in their 2020 form do not fully meet the minimum requirements set forth by ESSA.

Addressing the Gap in Word Recognition Instruction and Implications for ESOL & ELA Classroom Instruction

This issue becomes even more pronounced when considering the gap in WIDA's coverage of language at levels smaller than the word, which presents significant challenges in aligning them with Georgia's ELA standards. For example, Georgia's new ELA standards include nine foundational standards in kindergarten, six in first grade, and three in second grade that address recognizing and using parts of language smaller than a word (Georgia Standards of Excellence, n.d.). These foundational standards are crucial for developing word recognition skills, which form the lower strands of Scarborough's Reading Rope (see Figure 2).

The disconnect between WIDA's standards and these critical word recognition skills is particularly problematic for teachers providing ESOL services during ELA classes. An ESOL segment lasts 45-55 minutes per day, depending on student grade level. During this time, the ESOL teacher focuses on language comprehension skills, attempting to integrate both WIDA ELD standards and relevant content standards. However, the limitations inherent in the WIDA standards may significantly restrict the extent to which Georgia Standards of Excellence (GSE) can be effectively addressed in these lessons.

As a result, multilingual students may miss out on essential word recognition lessons that their classmates receive, leading to a lack of instruction in these critical areas of literacy development. This gap in instruction highlights the need for a more integrated approach that ensures both language comprehension and word recognition skills are adequately addressed in the classroom.

Revisit Guiding Question on Instruction

Given the analysis above, the instructional practices for multilingual learners in Georgia exhibit only partial alignment with the Science of Reading, Structured Literacy, and foundational literacy skills, as posed by our guiding question. While Georgia's ELA standards and new literacy legislation comprehensively address both language comprehension and word recognition, the WIDA 2020 Standards Framework primarily emphasizes language comprehension, leaving a critical gap in word recognition instruction. This gap hinders the full implementation of an integrated literacy approach, particularly in ESOL classrooms, where the standards do not fully support the foundational skills necessary for reading proficiency as outlined in Scarborough's Reading Rope. (See Figure 2). Consequently, despite some areas of alignment, significant gaps remain, especially in word recognition, *which is essential for the comprehensive literacy development of multilingual learners.*

Curriculum, Resources, and Alignment

Guiding Questions: Is literacy instruction for multilingual learners equitable across all grade levels? Do teachers have the framework to plan for student success?

The gaps in instructional standards for English Learners (ELs) have led to curriculum challenges and difficulties in implementing a curriculum that meets the needs of all student populations, including various subgroups within ESOL (e.g., Long Term English Learners or LTELs). This section uses the Georgia Department of Education's (2023) Reading Readiness Dashboard², covering grades 3, 5, 7, and 11, to showcase the systematic imbalance in curriculum, resources, and alignment between English Learners and Non-English Learners regarding reading proficiencies.

Reading Proficiency and Concerns of ESOL Students Across Grade Levels

Georgia's K-12 English Language Arts Standards, particularly Phonological Awareness, Concept of Print, and Phonics for grades K-5, establish clear expectations for classroom teachers to teach foundational word recognition skills (English Language Arts Program, n.d.). The 2025-

² GaDOE's Reading Readiness Dashboard is a tool designed to support educators by providing data on students' reading readiness. The dashboard includes various metrics like early literacy assessments, student demographics, and intervention outcomes, allowing educators to track and analyze the progress of their students in developing essential reading skills.

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2026 ELA standards, set to take effect in academic year 2025, further define these teacher responsibilities (see Figure 5, Column 1) (English Language Arts Program, n.d.).

Figure 5. Screenshot of K-5 Foundations: Progression of Skills & Concepts

K-5 Foundations: Progression of Skills & Concepts						
	Kindergarten	1 st Grade	2 nd Grade	3 rd Grade	4 th Grade	5 th Grade
BIG IDEA: Phonological Awareness						
K.F.PA.1: Rhyme						
K.F.PA.2: Words & Sentences						
K.F.PA.3: Compound Words						
K.F.PA.4: Syllables						
K-1.F.PA.5: Onsets & Rimes						
K-1.F.PA.6: Phonemic Awareness						
BIG IDEA: Concepts of Print						
K.F.CP.1: Conceptualizing Text						
K.F.CP.2: Book Orientation & Directionality of Print Texts						
K.F.CP.3: Mechanics of Print Texts						
K.F.CP.4: Alphabet Knowledge						
BIG IDEA: Phonics						
K-2.F.P.1: Phoneme- Grapheme Correspondences						
K-2.F.P.2: Decoding with Phonics						
K-2.F.P.3: Encoding with Phonics						
3-5.F.P.4: Decoding & Encoding with Phonics						
BIG IDEA: Fluency						
K-5.F.F.1: Oral & Silent Reading Fluency						
BIG IDEA: Handwriting						
K-2.F.H.1: Motor Skills & Letter/Word Formation						
K-2.F.H.2: Transcription & Handwriting Fluency						
3-5.F.H.3: Read Cursive						
3-5.F.H.4: Write Cursive						

Note. This screenshot was taken in September 2024 from

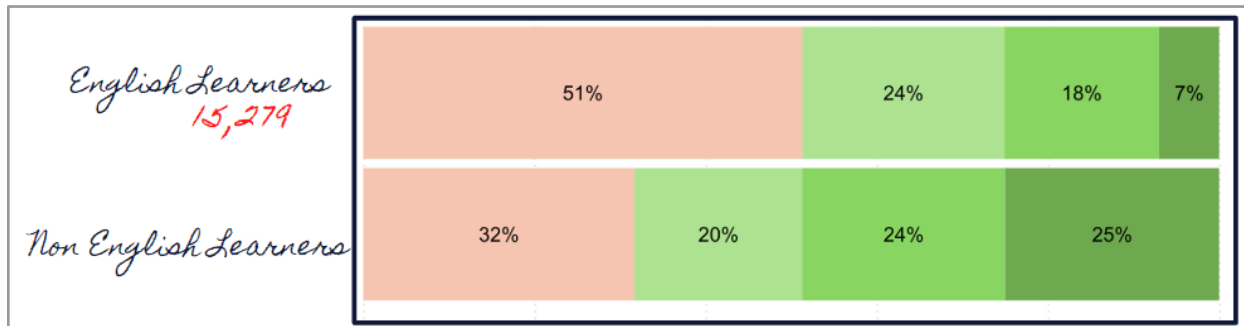
<https://lor2.gadoe.org/gadoe/file/96d4f85c-57b4-4187-b9d7-a34c6d009396/1/GaDOE-ELA-3-5-Standards-Foundations.pdf>

Figure 5 also illustrates the progression of literacy skills and concepts for grades K-5. However, it fails to address the *specific needs of multilingual learners*, which may result in these students being overlooked in this critical area of instruction beyond the early grades. For students entering U.S. schools in grade 3 or later, there is significant lack of age-appropriate coursework focused on foundational literacy within Tier One instruction.

In contrast, the WIDA standards place no specific expectations on teachers regarding word recognition, and ESOL teachers are not expected to address this skill at any grade level. This discrepancy highlights a potential gap in support for multilingual learners as they progress through the education system. To understand the impact of this gap, we examine data from the Georgia Department of Education’s Reading Readiness Dashboard for grades 3, 5, 7, and 11. The dashboard presents performance categories in reading for English Learners (ELs) and Non-English Learners (Non-ELs), with the color salmon indicating the lowest performance category (not at reading readiness) and green indicating reading readiness. Figure 6 displays third grade results.

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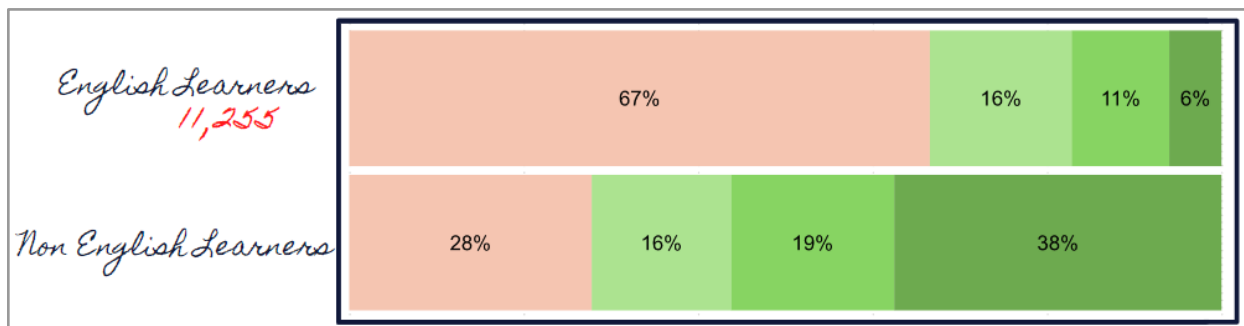
Figure 6. Third Grade Georgia Students



Note. Reading Readiness by Subgroups; Grade Level Reading Status. State of Georgia. 2022-2023. <https://georgiainsights.gadoe.org/Dashboards/Pages/Reading-Readiness.aspx> Retrieved in June 2024

Figure 6 reveals that a significant proportion (51%) of English Learners (ELs) in the third grade are in the lowest performance category, whereas only a small percentage (7%) are in the highest performance category. In contrast, Non-English Learners (Non-ELs) exhibit a *more balanced distribution across performance categories*, with 25% of them in the highest performance category. This stark difference indicates that English Learners in third grade are struggling more compared to their Non-English Learner peers.

Figure 7. 5th Grade Georgia Students



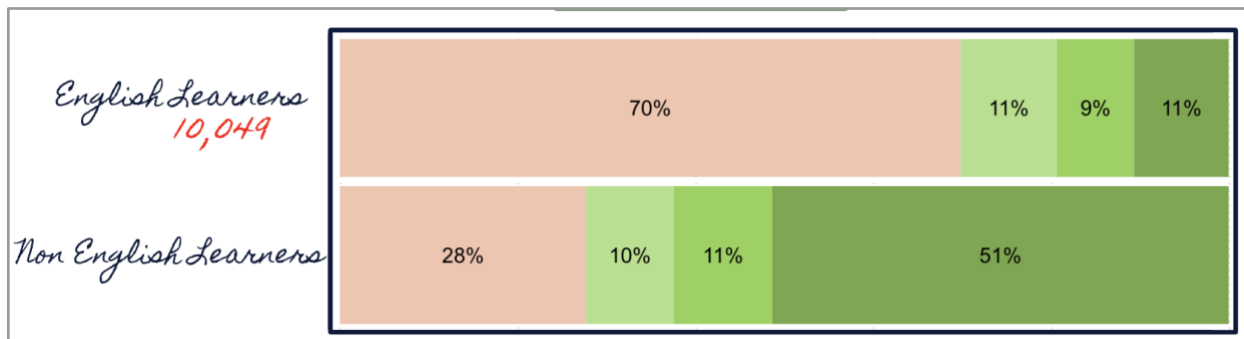
Note. Reading Readiness by Subgroups; Grade Level Reading Status. State of Georgia. 2022-2023. <https://georgiainsights.gadoe.org/Dashboards/Pages/Reading-Readiness.aspx> retrieved in June 2024

Figure 7, which exhibits a similar result to Figure 6, shows that a significant proportion (67%) of English Learners (ELs) in fifth grade are in the lowest performance category, while only a small percentage (6%) are in the highest performance category. Non-English Learners (Non-ELs),

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again, show a more balanced distribution across performance categories, with 38% of them in the highest performance category. English Learners are struggling significantly more compared to their Non-English Learner peers, with a much higher percentage in the lower performance category and a much smaller percentage in the higher performance category.

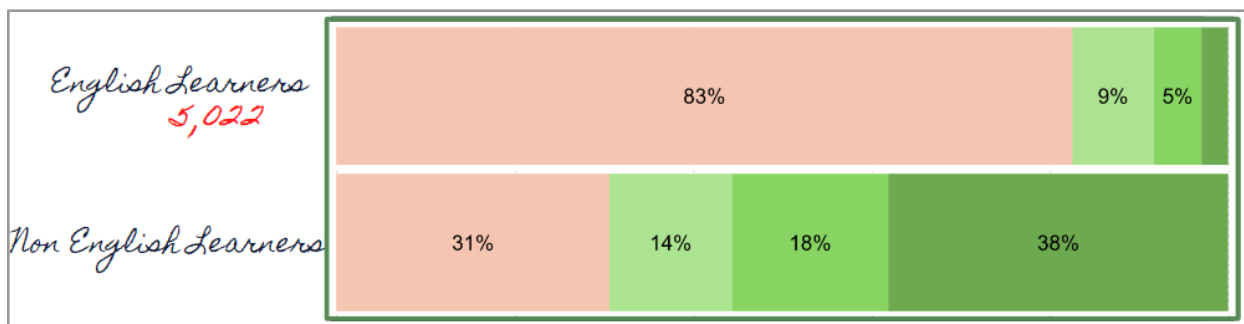
Figure 8. 7th Grade Georgia Student



Note. Reading Readiness by Subgroups; Grade Level Reading Status. State of Georgia. 2022-2023. <https://georgiainsights.gadoe.org/Dashboards/Pages/Reading-Readiness.aspx>. Retrieved in June 2024

Figure 8—like Figures 6 and 7—reveals that a significant proportion (70%) of English Learners (ELs) in seventh grade are in the lowest performance category, while only a small percentage (11%) are in the highest performance category. In contrast, Non-English Learners (Non-ELs) show a more balanced distribution across performance categories, with a substantial percentage (51%) achieving the highest performance level.

Figure 9. 11th Grade Georgia Students



Note. Reading Readiness by Subgroups; Grade Level Reading Status. State of Georgia. 2022-

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2023. <https://georgiainsights.gadoe.org/Dashboards/Pages/Reading-Readiness.aspx> Retrieved in June 2024

Figure 9 illustrates the distribution of 11th grade (i.e., high school) students in Georgia, comparing English Learners (ELs) and Non-English Learners (Non-ELs). Among the 5,022 English Learners, 83% fall into the largest segment, while 9% and 5% are in the next segments, respectively. In contrast, Non-English Learners show a more even distribution: 31% are in the largest segment, 14% in the next, 18% in the following, and 38% in the smallest segment. This disparity suggests that English Learners are more heavily concentrated in the largest category, potentially indicating lower academic performance or other issues compared to their Non-English Learner peers.

Data from GaDOE’s Reading Readiness Dashboard for 2023 for Grades 3, 5, 7, and 11 highlights significant challenges in Georgia. These disparities underscore the critical need for targeted interventions and support for English Learners to help close the performance gap and enhance their academic achievement. However, students whose interrupted educational experience excludes education during those years or students who do not solidify the skill of recognizing words in those grade levels will never again in their K-12 career have a grade level teacher or ESOL teacher whose age-appropriate standards provide the opportunity to teach word recognition.

Long Term English Learners and Reading

Despite the evolving scholarship on emergent bilingual students, *LTEs*—“English learners who have been educated in U.S. schools for six years or more” (Fu, 2021)—have often been overlooked and underserved. *LTEs* struggle with academic reading in English, particularly in reading comprehension and literacy skills, causing significant challenges in their reading proficiency (Rhinehard, Bailey, and Haagart, 2022). They often lack oral and literacy skills needed for academic success, struggle with textbooks, vocabulary, long written passages, and display weak English syntax, grammar, and vocabulary (Olsen, 2014, p. 5).

Studies suggest that *LTEs* require specialized, intensive interventions in developing academic English and literacy skills. Hanover Research (2017) indicates that robust language and literacy support in elementary school can prevent students from becoming *LTEs* and improve their long-term academic outcomes. Trends from the GaDOE’s Reading Readiness

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Dashboard data show a larger reading proficiency concern that could be attributed to LTELs, emphasizing the need for targeted educational strategies.

Trends Across the Grade Bands and Queries

A noticeable trend is that as multilingual learners advance through grade levels, fewer students remain in the ESOL program. However, those who do stay often have critically low literacy skills (see Figures 6-9). This trend raises several key questions that need to be addressed to better understand and support these students:

1. **Duration of Participation in ESL Programs:** Among the 5,022 multilingual students in the ESOL program in Georgia, how many have been studying English for over 5-7 years and are now LTELs in 11th grade?
2. **Word Recognition Skills:** Of these long-term students, how many have not developed word recognition skills?
3. **Impact of Interrupted Education:** For students who enter the U.S. with limited or interrupted formal education, what gaps in word recognition skills exist, particularly for those arriving after grade 3, which is the last year that foundational literacy skills are explicitly taught in Tier 1 instruction?
4. **Teacher Responses and Actions:** What are ESOL teachers doing to address these needs? Are they implementing strategies that deviate from GaDOE's guidance, which suggests using the WIDA ELD Standards Framework 2020 in conjunction with content standards for their grade level?
5. **Alignment with Literacy Research:** If teachers are not addressing these specific needs, are they strictly following WIDA standards but inadvertently contradicting literacy research on what these students require?

These questions highlight the critical areas needing investigation and action to ensure that all multilingual learners receive the necessary support across the grade bands to develop their literacy skills effectively.

Revisit Guiding Questions on Curriculum, Resources, and Alignment

The analysis of literacy instruction for multilingual learners in Georgia reveals that it is not equitable across all grade levels, as gaps in instructional standards and curriculum alignment persist. In addressing the question of whether teachers have the framework to plan for student success, it becomes clear that while the Georgia Standards of Excellence provide a strong

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foundation for teaching literacy skills in the early grades, this framework does not effectively extend to higher grade levels for English Learners (ELs). The WIDA 2020 Standards Framework, which is heavily relied upon for ESOL instruction, falls short in addressing word recognition, *leading to a significant disparity in literacy outcomes between English Learners and their Non-English Learner peers*, as shown by the Georgia Department of Education's Reading Readiness Dashboard (2023) data. Consequently, while a framework exists, it is insufficient to ensure equitable literacy instruction and success for all multilingual learners, particularly as they progress through the grades and encounter greater challenges in literacy development.

Comprehensive Assessment and Intervention

Guiding Questions: Do the assessments included in WIDA's suite of assessments effectively identify gaps in students' reading skills? Is instruction and intervention aligned with the data from these assessments?

Overview of Reading Assessment and Intervention Needs

The reading domain of the ACCESS for ELLs (WIDA, 2024) test measures reading proficiency through various assessments, evaluating comprehension and literacy skills across social and academic contexts. It includes multiple-choice items covering main ideas, details, inferences, and vocabulary in context. Administered in both paper-based and adaptive online formats, the test is available for grades K-12. *However, challenges such as decoding difficulties and insufficient English proficiency can affect the accuracy of these assessments.*

Accommodations like visual aids and oral administration could improve accuracy but may shift the focus from reading proficiency to listening and oral comprehension.

ACCESS for ELLs (WIDA, 2024) score reports help educators understand students' English language proficiency across listening, speaking, reading, and writing domains. Reports include proficiency level scores, scale scores, and comparisons to previous years. However, in the absence of an assessment of foundational literacy skills, these reports should be supplemented with additional assessments to identify specific reading skills, such as decoding. For kindergarten, the overall reading score lacks detailed performance information, underscoring the need for an English Language Proficiency (ELP) assessment that provides relevant literacy skills data. The assessment may ask students to demonstrate knowledge of word recognition skills, but the test is not scored in a way to give information about student performance in that area. Scores are reported with a single, overall reading score. It is interesting, however, that the

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kindergarten assessment may ask word recognition questions since no WIDA ELD standards for kindergarten list those skills. ESOL teachers deserve an ELP assessment that gives relevant information on student literacy skills across all areas of literacy. Cavazos (2024) reports that for every strand of literacy, multilingual learners have critical oral language needs. The ELP assessment should assess progress in those areas.

According to the Center for Applied Linguistics (2023), the Reading domain has relatively high conditional standard errors of measurement (CSEM), especially for students in lower proficiency levels. This indicates that the ability of this reading assessment to accurately measure reading proficiency for students with lower proficiency levels is less reliable. The variability in CSEM is largely driven by the adaptive nature of the test and the characteristics of the items students encounter. This is particularly noticeable at the extremes of the score distribution, where students who answer very few or very many items correctly are more likely to experience higher measurement errors. The higher CSEM values for students at a lower proficiency in the Reading domain suggest that WIDA's ACCESS for ELLs Reading assessment, for academic year 2023, potentially provides less accurate and reliable measures of proficiency for these students. This underscores the challenge of assessing students who are still developing basic academic language skills and points to areas for potential improvement in future iterations of the test to better capture early reading proficiency.

The Proficiency Level Descriptors (PLDs) for reading offer a framework for assessing and supporting student progress, detailing what students can understand and do with written language at each proficiency level. They emphasize functional language skills necessary for academic success. However, PLDs lack explicit references to phonological awareness and decoding, crucial for reading development. Incorporating these skills into the descriptors would align them more closely with Halliday's Stratified Model of Systemic Functional Linguistics (Martin & Matthiessen, 1991)—the theoretical underpinning of WIDA—and provide a comprehensive evaluation of a student's reading proficiency.

Challenges in Supporting Multilingual Learners

Current resources like WIDA's PLDs and ACCESS assessments often misalign with structured literacy, impacting the effectiveness of committee conversations and ultimately the

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direction of interventions through the Multi-Tiered System of Supports (MTSS)³. PLDs and other WIDA resources are often used in MTSS meetings to describe what teachers should expect of student language. They support the conversation about the source of instructional struggle. The ESOL teacher points to the student level in PLDs to explain why their struggle is either typical or atypical for a multilingual student at that language level. *These resources lack detailed information on orthographic mapping and phonological skills, which are critical for identifying and supporting struggling readers.* Lacking this information, MTSS teams might struggle to accurately identify and address students' reading challenges.

Detailed assessment data is crucial for identifying whether a student's reading struggles are typical of language acquisition or indicative of a learning disability (See Vignette). Including information on phonological awareness and alphabetic principles in PLDs would enhance the role of ESOL teachers in MTSS meetings, ensuring more effective support for multilingual learners who need that support.

By addressing the misalignment of WIDA's resources and improving assessment details, educators can better support the literacy development of multilingual learners, ensuring they receive appropriate services and effective interventions. This combined approach integrates assessment data with instructional strategies, fostering a more cohesive and responsive educational environment for all students.

Revisit Guiding Questions on Comprehensive Assessment and Intervention

The section emphasizes the importance of aligning WIDA's assessments and resources with comprehensive literacy interventions within the Multi-Tiered System of Supports (MTSS). While the ACCESS for ELLs test evaluates various aspects of reading proficiency, it may miss crucial foundational literacy skills, such as phonological awareness and decoding, which are essential for accurately diagnosing reading difficulties. The current Proficiency Level Descriptors lack explicit references to these skills, potentially leading to challenges in MTSS teams' ability to identify and address the specific needs of multilingual learners. Enhancing WIDA's assessment tools to include these critical literacy components would better equip

³ Multi-Tiered System of Supports (MTSS) is an educational framework designed to provide targeted support to students based on their individual needs. It involves multiple tiers of intervention, starting with high-quality instruction for all students (Tier 1), followed by more intensive interventions for those who need additional support (Tier 2 and Tier 3), with the goal of ensuring every student achieves academic and behavioral success. [Hamayan et al. (2023)]

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educators to support multilingual students effectively, ensuring interventions are more precisely targeted and aligned with the data.

Acceptable Solutions

Word recognition, encompassing phonological awareness, the alphabetic principle, and sight recognition, is fundamental to early reading development (Boyer & Ehri, 2011; Castiglioni-Spalten & Ehri, 2003; Chen, Irey, & Cunningham, 2018; Ehri, 2020; Hatcher, Hulme & Snowling, 2004; Martínez, 2011; Rehfeld et al., 2022). However, these critical components are conspicuously absent from WIDA’s ELD Standards Framework, Proficiency Level Descriptors, and assessments, creating a significant gap in the tools intended to guide multilingual learners to be proficient readers of English. This omission not only undermines the effectiveness of literacy instruction but also risks leaving a vulnerable population without the necessary skills to succeed to the same level as their non-English learner counterparts. To best serve our multilingual students and ensure they receive the comprehensive literacy education they deserve, ***WIDA must integrate phonological awareness, the alphabetic principle, and sight recognition into its standards, instructional tools and assessments (i.e., PLDs and ACCESS for ELLs).*** Failing to address this gap perpetuates educational inequities, denying students the full spectrum of literacy skills needed to thrive academically and beyond.

By embedding these critical areas in the WIDA ELD Standards Framework across all grade levels, we not only honor the educational needs of students who enter the U.S. after grade 3, missing the foundational instruction provided in grades K-2 through Georgia’s core curriculum, but also affirm their right to an equitable education. This shift would empower ESOL teachers to provide comprehensive instruction in all areas necessary for students to become skilled readers, aligning with what reading research (i.e., the Science of Reading) shows is essential for literacy development. Without these updates, we risk perpetuating a system that neglects the foundational needs of our most linguistically diverse students, hindering their potential to achieve literacy and academic success.

Moreover, multilingual students deserve the inclusion of phonological awareness, the alphabetic principle, and sight recognition in the Proficiency Level Descriptors at every grade level, ensuring that their progress is measured against a complete set of literacy skills for all students, including students with limited or interrupted formal education. This would allow teachers to set precise and appropriate reading expectations for students who are still developing

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word recognition skills, which is vital for both the MTSS process and effective instructional planning. The absence of these components in current assessments and descriptors leaves a void that can misguide intervention efforts and delay critical support for students in need. The assessment suite must also be updated to reflect these changes, ensuring that WIDA's ACCESS assessments comprehensively evaluate word recognition at every grade level. This would support not only primary-grade students but also those who enter the U.S. after grade 3 and are just beginning to learn English sounds and word recognition skills, thereby bridging a significant gap in their educational journey.

The urgency of this need cannot be overstated, and while these changes require time, WIDA states committed to aligning with the latest reading research will need transition plans and temporary support structures. The longer we delay, the more we risk depriving students of the skills they need to navigate the academic and social demands of literacy in English. These updates will provide multilingual learners with an education that truly equips them with the skills necessary to become literate in English, offering them the tools they need to succeed in an increasingly complex world. By aligning WIDA's assessments and resources with Systemic Functional Literacy, we take a significant step toward ensuring that all students, regardless of their linguistic background, have the opportunity to reach their full potential.

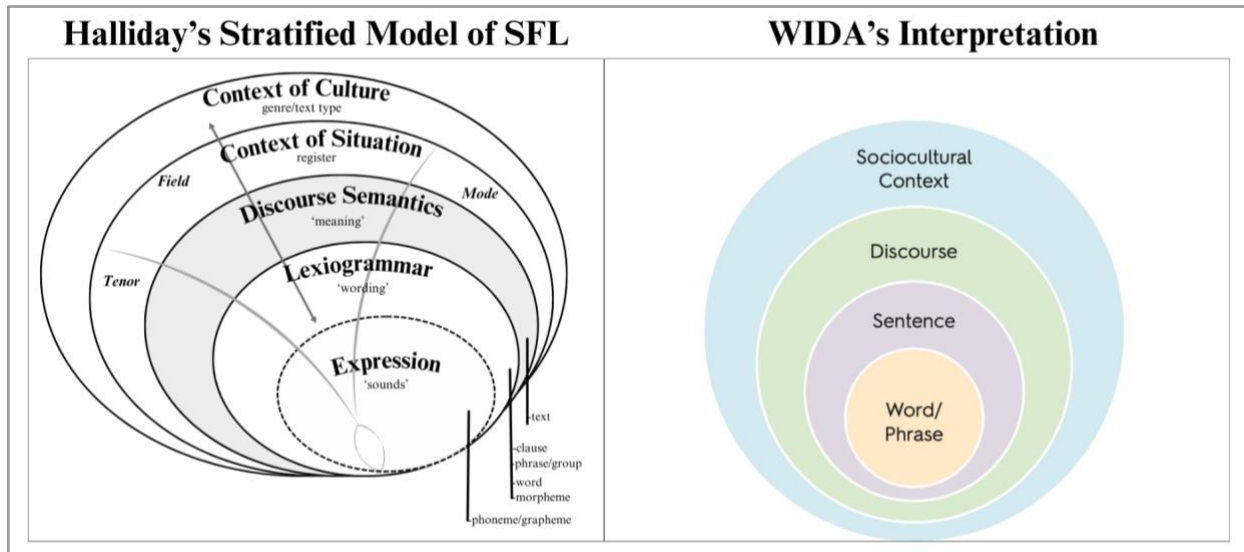
Conclusion

While WIDA's assessments and resources provide states with a structured approach to meeting federal guidelines, the glaring disconnect between WIDA's foundational resources and Georgia's efforts to incorporate structured literacy instruction is deeply concerning. In an era where leading educational institutions have embraced and integrated structured literacy research, WIDA's silence on this matter is not just a missed opportunity—it is unacceptable. As John Parker, Assistant Superintendent of Floyd County Schools, aptly states, “We see this as an equity issue.”

WIDA's lack of alignment with the overwhelming body of research on structured literacy, particularly in addressing the critical word recognition needs of multilingual learners, calls for an immediate and decisive response. It is imperative that WIDA assures its member states that efforts are underway to align the WIDA ELD Standards, Proficiency Level Descriptors, and ACCESS Assessments with the latest evidence-based practices. This is not merely a recommendation; it is a demand for WIDA to acknowledge and respond to the irrefutable research on what multilingual learners require to become proficient readers.

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Figure 10. Comparison of Theoretical Approaches toward SFL



Note. WIDA's Interpretation comes from WIDA (2020), p. 32.

In essence, this is a clarion call for WIDA to refine their approach by incorporating English phonological elements into their dimensions of language, aligning more closely with Halliday's Model of Systemic Functional Linguistics (see Figure 10 above)—the very foundation cited in WIDA's theoretical framework (WIDA, 2020). The time for WIDA to act is now, for anything less would be an abdication of their responsibility to the learners they are meant to serve.

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