Getting Down to FACTS

Multilingual Learners learning English: What can California learn from other states?

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Abstract

This report relies on a set of analytic criteria to identify states in which multilingual learners of English (MLEs) demonstrate relatively strong performance on indicators such as academic achievement and high school graduation, resulting in Texas and Indiana as policy-relevant comparison contexts for California. Drawing on an updated, research-based framework of teacher knowledge, the report examines how state language education policies, licensure requirements, and certification structures align with evidence on effective instruction for MLEs. We then examine the potential ways in which funding level policy and resource use might contribute to the outcomes for MLEs.

Findings indicate that Texas and Indiana operationalize MLE-specific pedagogical, linguistic, assessment, and policy knowledge through distinct specialist certification pathways and externally verified competency requirements, whereas California relies primarily on universal authorizations embedded within general teaching credentials. In Texas and Indiana, clearer role differentiation, formal licensure examinations, and defined expectations for teachers of record serving MLEs contribute to more coherent preparation systems and more predictable access to bilingual or English language development services. The evidence suggests that MLE instruction is most effective when specialized linguistic and pedagogical expertise is treated as a core domain of professional competence rather than a supplemental skill expected of all teachers without verification.

Texas and Indiana also offer California important lessons about both MLE funding policy and resource use, though not as simple models to replicate. On funding policy, Texas demonstrates valuable structural innovations, including formula-based incentives for dual language programs, additional funding for non-MLE students in two-way programs, and tiered weights based on program type.

Indiana illustrates the principle of proficiency-differentiated funding, recognizing that students at different stages of language acquisition have different resource needs. However, both states also illustrate the critical importance of adequate funding levels. On resource use, Texas provides models for both accountability and infrastructure but also demonstrates that funding incentives cannot overcome chronic teacher shortages, with bilingual educators identified as a shortage field every year since 1990. Indiana's experience shows what happens when resource use accountability is not outlined in funding policy; for example, districts redirect targeted funds to cover shortfalls elsewhere, with 16% of complexity grant dollars statewide backfilling special education and MLE costs.

The report concludes that California's policy framework articulates a strong vision for multilingual education but lacks mechanisms to ensure consistent instructional capacity statewide. To strengthen policy coherence, the report recommends that California establish clearer specialist roles for MLE instruction, implement formal verification of MLE-specific teacher competencies, while maintaining shared responsibility across the teaching workforce. The report also recommends replacing the unduplicated pupil counts for funding with dual funding; increase the supplemental grant weight; incentivize dual language programs with supplemental funding; and differentiate funding level by English proficiency level.

Multilingual Learners learning English: What can California learn from other states?

California educates the largest population of multilingual learners who are learning English (MLEs) in the nation and has articulated an ambitious policy agenda aimed at promoting educational equity, linguistic development, and access to rigorous academic content for these students. Over the past decade, the state has advanced a series of reforms that include the English Learner Roadmap, Proposition 58, and Global California 2030, which emphasize inclusive instruction, bilingualism, and shared responsibility for MLEs across classrooms. Despite these efforts, persistent disparities in educational trajectories suggest that policy intent has not consistently translated into instructional practice, suggesting a need to examine the mechanisms through which state policy shapes classroom-level capacity for serving MLEs.

In the first part of this report, we examine teacher preparation policy as a critical, yet underleveraged, mechanism for advancing MLEs' educational opportunities in California. Specifically, the analysis focuses on how preparation requirements, authorization structures, and accountability mechanisms shape the instructional capacity of teachers of record. In the second part of the report, we attend to two related but distinct dimensions of K-12 school finance policy to examine the potential ways in which funding level policy and resource use might contribute to the outcomes for MLEs. The first is the funding level of policy, which concerns how much money is allocated to support MLE students and through what mechanisms, including funding weights, eligibility rules, and program incentives. The second is resource use, which concerns how districts actually deploy funds provided by state funding.

Identification Process for Comparison States

This report does not seek to identify a single "top" state for MLEs, nor does it include all states with high reported outcomes on any single indicator. Instead, states were included based on a set of analytic parameters designed to maximize comparability and interpretability, while minimizing distortions driven by population size, demographic heterogeneity, or measurement instability. Specifically, the analysis focused on states with (1) a sufficiently large MLE population to support stable subgroup estimates; (2) a predominantly Hispanic/Spanish-speaking MLE population[1]; and (3) a limited overlap between MLE identification and special education (no more than 15 percent), to reduce confounding associated with differential identification practices. States meeting these criteria were then examined across multiple outcome measures that included NAEP Grade 4 reading, high school graduation[2], and postsecondary-related indicators. States with very small MLE populations or highly heterogeneous MLE demographics, even when reporting exceptionally high graduation rates, were

[1] We set the inclusion cutoff at 65% Spanish speaking MLEs, a conservative estimate given the report's focus on policy implications for California and the state's population of MLEs, of whom 80% speak Spanish (Hill & Deng, 2025).

[2] Graduation rates for MLEs reported in this analysis are based on the Adjusted Cohort Graduation Rate (ACGR) for the MLE subgroup as calculated and reported by states to EDFacts and summarized by the U.S. Department of Education, Office of English Language Acquisition. Under federal reporting rules, ACGR subgroup rates reflect students who are classified as MLEs during the cohort period used for accountability purposes, rather than all students who were ever identified as MLEs at any point in their schooling. As a result, students who exit MLE status prior to the cohort year are typically excluded from the MLE graduation-rate calculation. This distinction is important because MLE graduation rates based on ACGR do not capture the full educational trajectories of ever–MLEs, and rates may vary systematically across states depending on reclassification practices and timing.

excluded because such rates are often statistically volatile and may not reflect system-level policy effects. This approach ensures that the states discussed in the report are not presented as exemplars, but as analytically coherent cases whose outcomes warrant deeper policy investigation and whose lessons are more plausibly transferable to California's context.

Data Availability and Constraints

The analytic scope of this report has been shaped by recent disruptions to the federal education data infrastructure, including leadership turnover and changes in public data access at the National Center for Education Statistics (NCES). In 2025, the removal of NCES leadership coincided with documented interruptions to routine data operations and public-facing data tools. While core aggregate datasets such as NAEP scale scores and EDFacts graduation rates remain accessible, several forms of disaggregated and longitudinal data that are critical for nuanced MLE analysis are no longer publicly available or are subject to increased access constraints.

Notably, the NAEP Data Explorer no longer supports disaggregation by former MLE or "ever-MLE" status, a limitation that restricts the ability to distinguish between students currently classified as MLEs and those who have exited MLE status, a distinction essential for valid interpretation of achievement patterns and has been widely used in prior peer-reviewed research. Additionally, webpages and documentation previously used to support extended MLE subgroup analyses have become inaccessible, limiting transparency and replicability for researchers relying on publicly available resources.

As a result, the findings presented in this report necessarily rely on stable, publicly available outcome indicators and secondary analyses where possible. These constraints underscore the importance of interpreting state-level MLE outcomes with caution and highlight broader challenges facing education research that depends on consistent federal data infrastructure.

Procedures

The first step in the identification of comparison states used part I of the most recent Consolidated State Performance Reports (2021-2022)[3]. Specifically, sections 1.4.1.1 Number of All ELs Enrolled in the State (this includes two data points: a count of the total number of MLEs in the state, and a count of MLEs with a disability), 1.4.1.2 Number of ELs in Local Education Agencies (LEAs) Receiving Title III Funds (count of MLEs in the State served by LIEPs in LEAs receiving Title III funds), 1.4.3 Number of MLEs speaking one of the five most common languages spoken in the State[4]. After identifying states meeting inclusion criteria, 28 states were eliminated.

[3] For all states except Alaska, Colorado, Kansas, Mississippi, Nebraska, New Mexico, Oregon, South Carolina, Utah, Wyoming, and the District of Columbia, which were not available and required the use of 2020-2021. See Table 2.

[4] Given the parameters for this report, an estimate of the proportion of Spanish-speaking MLEs was constructed from the count for Spanish in 1.4.3 divided by total MLEs in 1.4.1.1.

Table 2

Abridged State-Level Indicators Used to Identify Relatively High-Performing Contexts for MLE Analysis

State	NAEP 4th Reading MLE	Total MLE	MLEs in LIEP	MLE Spanish	Proportion MLE Spanish	MLE with IEP	Proportion MLE with IEP	Graduation %
Alabama	180	34965	31661	22613	0.647	4416	0.126	72
Alaska	174	13894	13195	1777	0.128	2295	0.165	68
California	181	1127627	1083021	925035	0.820	196900	0.175	69.1
Colorado	187	90155	88127	74072	0.822	15423	0.171	70.2
Delaware	190	16147	15620	11999	0.743	3021	0.187	76
District of Columbia	202	9347	8515	7222	0.773	1924	0.206	56
Florida	184	269534	269027	201714.00	0.748	32728	0.121	85.8
Georgia	186	133754	65387	108112	0.808	20096	0.150	62
Idaho	179	18426	18268	15230	0.827	3196	0.173	65
Indiana	203	72250	70944	51498	0.713	10604	0.147	89
Kansas	180	42694	39070	35004	0.820	6204	0.145	83.5
Kentucky	192	35434	33862	21413.00	0.604	4685	0.132	74
Maine	177	5420	4079	588.00	0.108	1091	0.201	81
Maryland	178	98566	98528	71288	0.723	12193	0.124	55.6
Massachusetts	183	97154	90414	53315	0.549	20241	0.208	68.3
Michigan	192	91932	88870	38068	0.414	10703	0.116	73.7

Minnesota	183	76664	68355	30290	0.395	13636	0.178	66.2
Missouri	186	34159	31577	18653	0.546	3686	0.108	73
Montana	174	3569	2799	484	0.136	703	0.197	65
Nevada	185	67003	66994	44003	0.657	12647	0.189	75.3
New Hampshire	193	4822	3710	2369	0.491	1038	0.215	67
New Jersey	171	112939	106698	85408	0.756	12248	0.108	73.1
New Mexico	173	49497	38900	31166	0.630	11487	0.232	75.8
North Carolina	190	121496	116265	102410	0.843	19664	0.162	71.4
North Dakota	189	3887	3360	1467	0.377	663	0.171	83
Oklahoma	190	64940	59289	50211	0.773	10342	0.159	84
Pennsylvania	182	77617	72827	49623	0.639	12106	0.156	69
Rhode Island	186	17289	15781	13806	0.799	2685	0.155	69
South Carolina	191	42731	42620	35306	0.826	6418	0.150	81.1
South Dakota	183	6539	6412	3014	0.461	1042	0.159	65
Texas	194	1093968	1092763	980832	0.897	125673	0.115	82.4
Utah	180	54067	52423	40750	0.754	10850	0.201	73
Vermont	199	1711	1242	208.00	0.122	282	0.165	49
Virginia	184	117417	117297	82755.00	0.705	21043	0.179	63.4
Washington	190	123785	121239	79879.00	0.645	24813	0.200	68.5
Wisconsin	179	49303	49016	32825.00	0.666	8847	0.179	77

The next iteration to identify states relied on the enrollment-weighted EDFacts child count data, which reveals approximately 15% of public school students are served under the Individuals with Disabilities Education Act (IDEA) (U.S. Department of Education, 2022). States with a proportion of MLEs that exceeded 15% were then eliminated (n = 13) due to the indication that there may be an overrepresentation of MLEs identified with a learning disability. Graduation rates of MLEs were then examined (Migration Policy Institute, 2025; NCES, 2023; Texas Education Agency, 2023; U.S. Department of Education, Office of English Language Acquisition, 2022) and only states with at least a graduation rate of 80% were retained (see Table 2)[5]. This eliminated the remaining states with the exception of: Florida, Indiana, Kansas, South Carolina, and Texas. Finally, 2024 NAEP 4th grade reading scores of MLEs[6] in the aforementioned states were compared to those in California, revealing that Indiana and Texas MLEEs scored significantly higher than California MLEEs ($p < .001$); however, the magnitude of these differences varied, with a moderate effect size for Indiana ($d = .56$) and a small-to-moderate effect size for Texas ($d = .33$)[7]. The trends of NAEP 4th grade reading are generally consistent with the 2024 outcomes, with some exceptions (see Figure 1). Using NAEP's Data Explorer to examine differences in the scale scores between states (i.e., t-tests), there were no statistically significant differences between California and Texas MLEs in 2017, 2003, and 1998 (see NCES, n.d.). The sample size was insufficient to run comparisons for Indiana prior to the 2007 administration of NAEP.[8]

[5] All states were ranked by MLE graduation rates and divided into quintiles; only states with graduation rates of at least 80%, representing the lower bound of the top quintile, were retained.

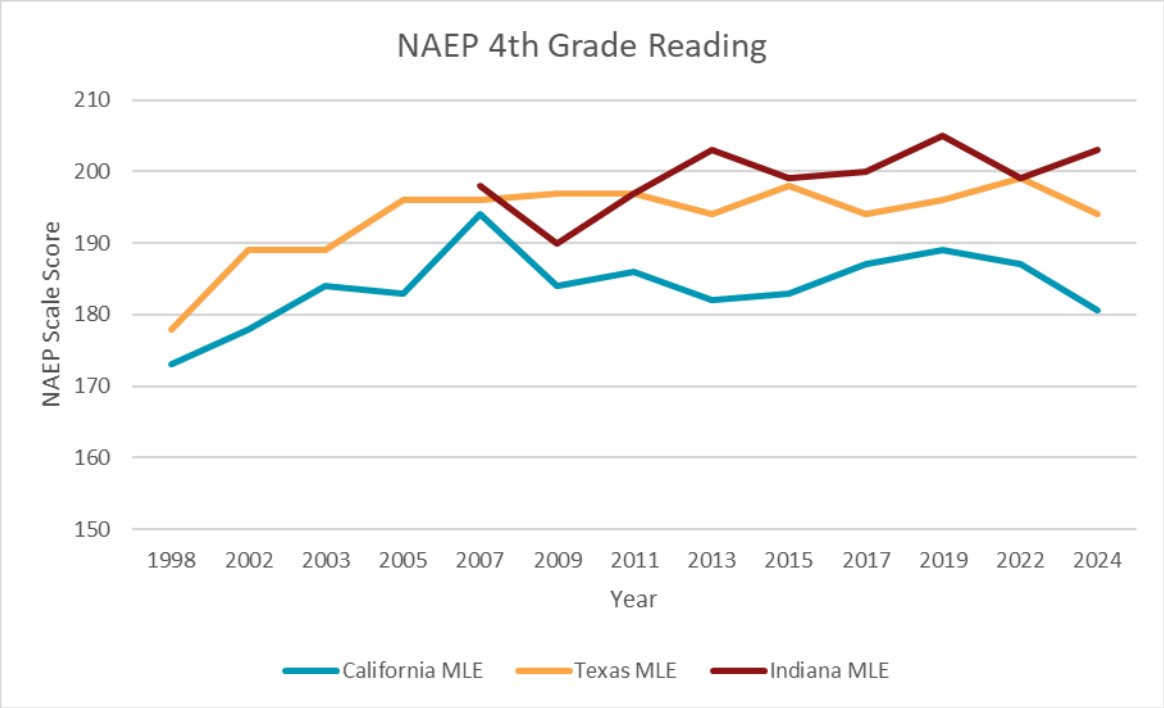
[6] Previous NAEP results provided disaggregated scores for MLEs, as well as students formerly labeled "MLE" but this was not an option in the most recent publicly available data explorer. The aforementioned trends also do not adjust for other variables. Whereas the proportion of students who qualify for free or reduced lunch in California and Texas are similar with an effect size $h = .05$, there is a moderately lower proportion of students who qualify in Indiana when compared to California ($h = .28$). Here, effect size h is interpreted as the standardized difference between two proportions (Cohen, 1988).

[7] At the time of this writing, the 2024 NAEP 4th-grade reading scale score standard deviations used to compute effect sizes have not yet been published in the publicly accessible NAEP technical documentation or state snapshot reports. Standard deviation values are typically included in the full NAEP technical report or retrievable via the NAEP Data Explorer once those files are released. Given the lack of availability of 2024 standard deviations, the most recent previously published coefficients from 2022 were used to approximate the standardized mean difference between the states.

[8] Scores among Non-MLEs in the three states were generally not significantly different with the exception of higher scores in Texas when compared to California in 1998 and 2005; and higher scores in Indiana when compared to California in 2003, 2013, and 2015.

Figure 1

Trends in NAEP Grade 4 Reading Achievement Among MLEs in California, Texas, and Indiana, 1998–2024



SOURCE: U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics, National Assessment of Educational Progress 1992, 1994, 1998, 2002, 2003, 2005, 2007, 2009, 2011, 2013, 2015, 2017, 2019, 2022, and 2024 Reading Assessments.

Having identified Texas and Indiana as contexts that might provide insights for California policy based on the various outcome indicators used above[9], the analysis now turns to a closer examination of how teacher preparation policies in these states align with the research-based framework, beginning with Texas and followed by Indiana, before returning to California for comparative policy implications.

[9]Additional indicators that were considered but ultimately excluded include the proportion of MLEs that exited their "EL" status within 5 years (7.2% for California, 1.4% for Texas, and 4.1% for Indiana) because reclassification timelines are highly sensitive to state-specific proficiency standards, assessment instruments, and exit criteria, as well as to the presence of late-arriving students who accrue years in U.S. schools rapidly but typically require more time to develop academic English. As a result, a fixed five-year benchmark risks conflating measurement and demographic differences with instructional effectiveness, limiting its usefulness for cross-state comparison.

Part I: The Role of Teacher Preparation in MLE Outcomes

A substantial body of research on preparing teachers for linguistically diverse classrooms demonstrates that educating MLEs requires forms of professional knowledge that extend beyond those expected in instructional contexts that do not involve language development considerations. Scholars consistently emphasize that effective preparation must be grounded in a coherent framework integrating specialized pedagogical knowledge, linguistic knowledge, and knowledge of cultural and linguistic diversity (Menken & Antuñez, 2001; Faltis & Valdés, 2016; López & Santibañez, 2018). This scholarship underscores that MLE instruction is not an add-on skillset, but a specialized domain of teaching expertise that requires deliberate policy attention within preparation and credentialing systems.

Part I of the report is guided by three research questions: (1) Which states demonstrate stronger outcomes for MLEs relative to California? (2) What differences in language instruction education program (LIEP) policies and teacher preparation requirements aligned with the research-based framework correspond to outcome patterns in identified states? (3) How might similar policy mechanisms be leveraged or adapted in California to improve equity and outcomes over time?

To address these questions, this report updates an existing framework (see López & Santibañez, 2018) by incorporating evidence-based practices for MLEs identified in Chapters 8 and 9 of a National Academies of Sciences, Engineering, and Medicine report (NASEM, 2017). The updated framework also integrates more recent empirical research on instructional practices, teacher preparation, and policy supports associated with improved MLE outcomes (see Table 1). This evidence-informed framework serves both as a synthesis of the research base and as an analytic lens for examining alignment between research-based principles and state-level teacher preparation policies in states demonstrating relatively stronger MLE outcomes.

Importantly, the framework is not intended to suggest that teachers alone are responsible for addressing all sources of variation in MLE outcomes consistent with NASEM's (2017) emphasis. Rather, the framework highlights that the effectiveness of teacher knowledge and practice is contingent upon the policy and programmatic conditions under which instruction is enacted. Prior research demonstrates that state policy environments play a consequential role in shaping MLE outcomes, particularly through configurations of teacher preparation requirements and LIEP policies (López et al.,

2015; López & Santibañez, 2018). The earlier analyses suggest that policy design matters for instructional capacity and student outcomes, which provides the conceptual foundation for the present study. This report extends that line of inquiry through a broader comparative analysis of state policy contexts selected based on indicators of MLE success, with the goal of identifying policy mechanisms that promote greater coherence, accountability, and equity in California's teacher preparation system.

Table 1

Operationalized Framework of Teacher Knowledge Updated with NASEM (2017) Promising Practices

Domain of Knowledge	Operationalized Aggregate Category	Discrete Categories Subsumed Within Aggregate	Additions from NASEM (2017)
Knowledge of Pedagogy	L1 Literacy	L1 literacy development; biliteracy foundations	Strengthened evidence for cross-linguistic transfer and the role of home-language literacy in supporting English development
	ESL / ELD	ESL/ELD methods; methods for subject matter content in English; methods for subject matter content in L1; bilingual methods	Reinforced emphasis on integrated language–content instruction across grade levels and sustained academic language development
	Curriculum	Materials adaptation; bilingual curriculum	Greater attention to curricular coherence, alignment with grade-level standards, and language demands of disciplinary content
	Assessment	Assessment of subject content; English literacy assessment; L1 literacy assessment; language assessment	Emphasis on minimizing construct-irrelevant linguistic load and interpreting assessment

Domain of Knowledge	Operationalized Aggregate Category	Discrete Categories Subsumed Within Aggregate	Additions from NASEM (2017)
	Practicum	Practicum in culturally and linguistically diverse settings; practicum in bilingual settings	results in light of instructional context Reinforced importance of field experiences aligned with MLE instructional contexts, with attention to availability as a structural condition
Knowledge of Linguistics	Linguistics	Sociolinguistics; psycholinguistics; first and second language acquisition; bilingualism and multilingualism	Nuanced attention to long-term trajectories of academic language development and the linguistic demands of disciplinary learning
Knowledge of Cultural and Linguistic Diversity	Cultural & Linguistic Diversity	Policy and legislation; history of bilingual/ESL education; multicultural education; parent and community involvement; teacher identity and bias	Reinforced asset-based orientations and attention to how sociopolitical contexts shape instructional opportunities

Note. The promising practices identified by NASEM (2017) largely reinforce and add specificity to the discrete categories articulated by Menken and Antuñez (2001) and subsequently aggregated by López and Santibañez (2018) using Faltis and Valdés (2016). Where NASEM extends the literature, it does so primarily by underscoring the programmatic and policy conditions that shape the enactment of teacher knowledge, rather than by identifying fundamentally new categories of teacher expertise. NASEM also underscores that differentiated supports for MLE subpopulations (e.g., migrant students, students with interrupted formal education, Indigenous MLEs) are primarily shaped by programmatic and institutional conditions that mediate the enactment of teacher knowledge.

In the sections that follow, we provide a summary of the extant literature supporting specific knowledge for teachers of MLEs. This literature is reflected in the framework applied in this report (see Table 1).

Pedagogical Knowledge for Teaching MLEs

Teachers of MLEs require pedagogical knowledge that goes beyond general instructional skills and is instead organized around the deliberate integration of language development and grade-level content learning. This includes understanding how language develops over time, how disciplinary language demands vary, and how instructional scaffolds can maintain access to rigorous content while English proficiency is emerging (NASEM, 2017). Recent syntheses reinforce that effective practice for MLEs are not a set of isolated strategies, but a coherent instructional design stance in which teachers plan for multilingualism as a resource and adapt instruction responsively in context (Scherzinger & Brahm, 2023; Veerman et al., 2025).

Pedagogical knowledge for MLE instruction includes at least five interrelated areas (see López & Santibañez, 2018). First, primary language (L1) literacy and biliteracy foundations matter because home-language literacy can support English development through cross-linguistic transfer; teachers therefore need pedagogical tools for leveraging students' L1 as an instructional resource rather than treating it as a competing priority (NASEM, 2017). This position is echoed in competence-based models of bilingual education teaching, which emphasize teachers' understanding of bilingual development and cross-linguistic relationships as central to effective instruction (Scherzinger & Brahm, 2023).

MLE teachers also require expertise in English as a Second Language/English Language Development (ESL/ELD) methods and integrated language–content instruction, including the ability to embed language objectives within disciplinary teaching and to sustain disciplinary language development across grade levels (NASEM, 2017). Veerman et al.'s (2025) systematic review of MLEE pedagogies further demonstrates that instructional approaches such as translanguaging, cross-linguistic scaffolding, and linguistically affirming practices are most effective when they are intentionally designed and systematically enacted, rather than used as ad hoc accommodations. These findings underscore that language development must be treated as a core instructional goal embedded within content teaching, not as a parallel or supplemental activity.

Another requisite competence teachers must develop is knowledge of curriculum design and materials adaptation, particularly in terms of the ability to maintain grade-level rigor while making the linguistic demands of disciplinary content explicit and accessible to MLEs. Research synthesized by NASEM (2017) highlights that access to high-quality curriculum and materials, combined with

intentional scaffolding of academic language, is a key condition for equitable learning opportunities for MLEs.

Effective pedagogy for MLEs depends on strong assessment literacy, including the capacity to distinguish language proficiency from content knowledge, minimize construct-irrelevant linguistic load, and interpret assessment evidence within instructional and linguistic contexts (López & Santibañez, 2018; NASEM, 2017). Without this knowledge, teachers may misinterpret MLEs' academic performance, leading to inappropriate instructional decisions or reduced access to rigorous content. Assessment competence thus functions as both a pedagogical and equity-related dimension of MLE instruction.

The extant literature emphasizes the importance of clinical and practicum experiences aligned with MLE instructional contexts. A recent systematic review of bilingual education teachers' competencies is consistent with prior research (see Faltis & Valdés, 2016; López & Santibañez, 2018) noting that pedagogical competences for MLEE teaching develop through practice-based learning opportunities that allow candidates to integrate theory, language knowledge, and instructional decision-making (Scherzinger & Brahm, 2023). Field experiences that explicitly focus on MLE instruction enable teachers to practice language-integrated pedagogy, curriculum adaptation, and assessment interpretation under supervision, reinforcing the coherence of preparation.

Although not explicitly reflected in the original framework presented by López and Santibañez (2018), research on teacher beliefs about MLEs clarifies that pedagogical knowledge that is affirming to MLEs is enacted through orientations toward language diversity. Gallagher and Scrivner's (2025) systematic review focused on teachers' beliefs about MLEs, particularly as they align with additive versus deficit perspectives, are associated with differences in instructional practices, including the use of students' home languages, the level of cognitive demand in instruction, and responsiveness to linguistic diversity. These findings help explain why pedagogical knowledge alone is insufficient: teachers' beliefs and orientations shape how, and whether, MLE-aligned pedagogical practices are implemented in classrooms.

Taken together, these converging strands of evidence reinforce the original framework applied by López and Santibañez (2018) by illustrating that pedagogical knowledge for teaching MLEs is multidimensional, integrated, and practice-oriented; encompasses instructional design, curriculum and

assessment expertise; and supervised practice, all mediated by teachers' beliefs about language and learning (Gallagher & Scrivner, 2025; NASEM, 2017; Scherzinger & Brahm, 2023; Veerman et al., 2025).

Linguistic Foundations for MLE Instruction

The knowledge of linguistics domain encompasses understanding how languages are acquired, structured, and used across social, cultural, and academic contexts. For teachers of MLEs, foundational linguistic knowledge is essential for interpreting students' language practices accurately and responding instructionally in ways that expand, rather than constrain opportunities to learn. Teachers who lack grounding in linguistics may misinterpret features of bilingual development that include transfer, code-switching, or nonstandard varieties of English as evidence of deficiency, leading to inappropriate instructional responses or lowered expectations (López & Santibañez, 2018; NASEM, 2017).

A central component of linguistic foundations is understanding second language acquisition (SLA) processes, including the non-linear, variable, and context-dependent nature of English development. Research synthesized by NASEM (2017) emphasizes that English proficiency develops over multiple years and is influenced by factors such as prior schooling, literacy in the home language, instructional quality, and opportunities for meaningful language use. Teachers with knowledge of SLA are better positioned to distinguish between typical developmental patterns and indicators of learning difficulty, reducing the risk of misclassification into special education or inappropriate instructional placements (López & Santibañez, 2018).

Equally important is knowledge of sociolinguistics, including how language use varies across social contexts, communities, and identities. Gallagher and Scrivner's (2025) review of teachers' beliefs about language diversity highlights that deficit-oriented interpretations of linguistic variation are often rooted in limited understanding of sociolinguistic principles. In contrast, teachers with stronger linguistic foundations are more likely to view variation in pronunciation, grammar, and discourse as rule-governed and meaningful, rather than erroneous, and to design instruction that builds on students' existing linguistic repertoires. This understanding supports more equitable participation structures and instructional interactions for MLEs.

Linguistic foundations also include knowledge of language structure (e.g., phonology, morphology, syntax, semantics, and discourse) and how these features manifest differently across

languages and registers. Scherzinger and Brahm (2023) identify knowledge of content-specific language proficiency[10] and cross-linguistic relationships as core competences for bilingual education teachers. Such knowledge enables teachers to anticipate areas of transfer and challenge, make linguistic demands explicit within content instruction, and provide targeted feedback that supports both language and disciplinary learning.

Importantly, linguistic knowledge underpins valid assessment and instructional decision-making for MLEs. Without understanding how language proficiency interacts with content performance, teachers may conflate language-related errors with conceptual misunderstanding, leading to inaccurate judgments about students' knowledge and abilities (NASEM, 2017). Foundational linguistics helps teachers interpret assessment results more appropriately and select instructional responses that address language demands without reducing cognitive rigor.

In summary, linguistic foundations are not ancillary to MLE instruction but constitute a core knowledge base that shapes how teachers interpret student performance, design instruction, and enact pedagogical practices. Preparation that includes second language acquisition, sociolinguistics, and the structure and use of disciplinary language equips teachers to recognize bilingualism as a resource, avoid deficit-based interpretations, and implement instruction that supports both language development and content learning (Gallagher & Scrivner, 2025; López & Santibañez, 2018; NASEM, 2017; Scherzinger & Brahm, 2023). This body of evidence reinforces the need for teacher preparation and professional learning systems that explicitly address linguistic foundations as a prerequisite for effective and equitable MLE instruction.

Cultural, Linguistic, and Policy Contexts of MLE Education

Understanding the cultural, linguistic, and policy contexts of MLE education is essential for teachers to situate instruction within the broader social, institutional, and legal environments that shape students' educational experiences. This domain encompasses knowledge of students' cultural and linguistic backgrounds, the sociopolitical conditions that influence language education, and the federal, state, and local policies governing identification, placement, instruction, and assessment of

[10] The authors refer to content-specific vocabulary as academic language, which we avoid given the issues raised by Valdés (2004, 2023) that include a lack of specificity and clarity.

MLEs. Teachers who lack this contextual knowledge may inadvertently implement practices that are misaligned with students lived experiences or with policy requirements, limiting MLEs' access to equitable learning opportunities (NASEM, 2017).

Cultural knowledge within this domain involves understanding how students' identities, family practices, and community histories intersect with schooling. Research synthesized by NASEM (2017) emphasizes that culturally responsive instruction for MLEs requires teachers to recognize and value students' cultural and linguistic assets while also understanding how cultural discontinuities between home and school can affect participation and learning. Gallagher and Scrivner's (2025) review further suggests that teachers' beliefs about language diversity and MLEs are shaped by broader sociocultural narratives and institutional norms, which in turn influence expectations, instructional interactions, and the extent to which students' linguistic and cultural resources are incorporated into classroom practice. These beliefs shape students' own perceptions of ability that have consequences for their academic trajectories (e.g., López, 2010).

Closely related is knowledge of the linguistic and sociopolitical context of multilingualism in the United States, including how language ideologies, power relations, and historical patterns of language policy shape educational practice. Teachers who understand these dynamics are better positioned to interpret students' language use as socially situated and to recognize how structural factors such as segregation, immigration policy, and accountability pressures affect MLEs' educational trajectories (López & Santibañez, 2018; NASEM, 2017). Such understanding supports more equitable instructional decision-making and advocacy for students within school systems.

Equally critical is teachers' understanding of the policy and legal frameworks governing MLE education. Federal and state policies shape how students are identified as MLEs, the instructional services they receive, how they exit their designation as MLEs, and how their progress is measured and reported. NASEM (2017) documents how misalignment between policy requirements and instructional practice can undermine educational outcomes for MLEs, particularly when accountability systems prioritize compliance over instructional quality. Teachers with policy knowledge are better equipped to navigate these systems, implement instructional models consistent with legal mandates, and collaborate with administrators to support students' rights to appropriate services.

The literature also highlights that contextual knowledge influences how pedagogical and linguistic knowledge are enacted in practice. Gallagher and Scrivner (2025) demonstrate that teachers' instructional choices are shaped not only by what they know, but also by how they interpret policy expectations, institutional constraints, and cultural norms within their schools. Without explicit preparation in cultural, linguistic, and policy contexts, teachers may default to risk-averse or deficit-oriented practices, even when they possess strong pedagogical or linguistic knowledge.

In summary, the extant research underscores that knowledge of cultural, linguistic, and policy contexts is a foundational component of effective MLE instruction. This domain enables teachers to align instructional practices with students' cultural and linguistic assets, navigate policy environments responsibly, and advocate for equitable learning conditions. The evidence supports the inclusion of contextual knowledge as a core domain in teacher preparation and professional learning, reinforcing the need for coherent systems that integrate instructional expertise with an understanding of the broader environments in which MLE education is enacted (Gallagher & Scrivner, 2025; López & Santibañez, 2018; NASEM, 2017).

The bodies of research that have informed and updated the tripartite framework underscore that preparing teachers to serve MLEs requires systemic attention to specialized knowledge rather than minimal or fragmented coursework. López and Santibañez (2018) found that when teacher preparation programs align with this framework, teachers are more likely to report higher self-efficacy and demonstrate instructional practices associated with stronger academic outcomes for MLEs. Conversely, when states dilute or omit these domains from certification requirements, teachers enter classrooms underprepared for the linguistic and instructional complexity MLEs bring with them.

Collectively, the more recent evidence from the reviews incorporated here, along with the recommendations by NASEM (2017) do not require additional domains of teacher knowledge but refine the existing framework by clarifying the depth, coherence, and conditions under which its domains contribute to improved outcomes for MLEs (see Table 1).

California

Language Instructional Education Programs. California schools must provide MLEs with access to high-quality education from early childhood to 12th grade that prepares them with the linguistic,

academic and social skills they require for college and careers. Education for MLEs in the state is guided by the California English Learner Roadmap, which was approved by the State Board of Education in 2017. In 2016 California voters approved Proposition 58, which authorizes school districts and county offices of education to establish LIEPs for MLEs which include Structured English Immersion (SEI), dual-language immersion, developmental bilingual, and transitional bilingual.[11] There is no numerical trigger and no percentage of students MLEs that determines a particular LIEP. If one or more of the students in the class needs English learner services or requires a particular program, "at minimum," LEAs should offer SEI.[12] In all cases, the teacher providing the MLE services must hold an appropriate English learner certificate or authorization, which since 2002 are embedded in every California multiple and single subject credential and not issued as separate certifications as they were prior to this date.

Identification of MLEs begins with the Home Language Survey administered by each school district upon school entry. Within 30 days of school entry, students whose primary language at home is not English (and who have not established English proficiency via a prior test result) must take the Initial ELPAC test (English Language Proficiency Assessments for California) to determine the level of English proficiency.[13] Students who do not achieve a minimum level of initial English proficiency on the ELPAC are designated as English Learners. To exit the English-Learner designation, students must obtain a minimum level on the ELPAC, be evaluated by their teachers as proficient, and obtain a minimum score on a test of ELA skills – usually the California standardized assessments (CAASP or other). Parents must be notified and consulted of the process, but their opinions are taken in an advisory capacity only.

MLE Teacher Certification. As of 2002, all teachers in California who receive a teaching credential are authorized to teach MLEs (authorized under Assembly Bill 1059). These teachers are authorized and trained in structured English immersion (SEI) and English Language Development (ELD) within their classroom/content setting or in subjects authorized by their credential. Teachers who want to be certified to teach in bilingual or dual-immersion language environments where content instruction is delivered in MLEs' primary language must receive an additional Bilingual Authorization. Teachers who come to California from another state or who earned their credential prior to 2002 and who teach designated ELD in secondary schools (outside of the classroom/content setting and

[11] https://www.cde.ca.gov/sp/ml/caedge.asp
[12] See here for fuller description of SEI and other programs: https://www.cde.ca.gov/sp/ml/edgesei.asp
[13] https://www.cde.ca.gov/ta/tg/ep/

delivered as a separate, departmentalized class) must hold a Cross-cultural, Language, and Academic Development (CLAD) credential or a single-subject credential in ELD content. To comply with the MLE authorization embedded in each credential, teacher preparation programs train teachers to understand and use appropriate instructional approaches for developing language proficiency and the use of disciplinary content language for English language development, understand and apply theories for language instruction, and use assessment data to identify MLE's academic proficiency in English. These requirements align with the competencies in Table 1.

In 2021 California underwent a literacy instruction reform (SB488), which made important changes to how teachers are prepared to teach MLEs. First, under the new literacy standards all teachers (not just ELD) specialists are responsible for attending to MLEs' language development during literacy instruction (integrated ELD). Second, the new standards are much more explicit about MLEs needing dedicated time for focused English language instruction that connects to their content learning (designated ELD). Prior to the 2021 reform, many teachers saw these two as separate tracks and treated ELD as a separate domain.[14] These skills and competencies are strongly aligned with those described in Table 1. To receive a preliminary credential, teachers in California must pass a series of assessments that evaluate their basic skills (through the CBEST , coursework or a combination of the two), subject-matter competence (through the CSET , an approved subject-matter program or a combination of the two), and a Teacher Performance Assessment (e.g. edTPA) which require teachers to complete performance-based tasks during their student teaching/clinical practice.[15] Teachers must also complete a literacy instruction assessment (before 2025 this was RICA for multiple subject, now the CTC offers other options). Because the EL authorization is embedded in the teaching credential the way teachers demonstrate EL-specific skills is through the TPEs (teacher performance expectations) which are CTC approved and part of every teacher credential coursework.

[14] This was part of a literacy reform adopted in 2021 which adopted new preparation standards and called for the replacement of the Reading Instruction Competence Assessment (RICA) with a new instrument: the Literacy Performance Assessment (LPA) beginning in 2025. As part of this reform, SB 488 established new teacher preparation standards to align it with the ELA/ELD framework adopted by the State Board in 2014. These new ELD standards called for teachers to design and deliver reading instruction that builds on students' primary language (among the strategies suggested are acquiring books and resources in the students' home languages) and equipping teachers with additional supports to teach phonics and foundational English language skills when teaching ELs.

[15] There is an edTPA for "English as an additional language" that is targeted toward teachers of MLEs and those receiving MLE authorizations, but teachers in California do not typically take this test because of the MLE-authorization being embedded in the credential, unless they are seeking a departmentalized (specialized) ELD credential or are coming from out of state.

Within five years of receiving their preliminary credential (upon completion of an accredited teacher preparation program) teachers must "clear" it by going through a teacher induction program. Induction is not MLE focused; the assumption is that MLE competency was established during preliminary preparation and will be further developed through the candidate's actual teaching practice (Santibañez, Snyder & Centeno, 2021). These standards were criticized for not being sufficiently attentive to MLE-specific needs. Induction standards were reformed in 2024 to include more nuanced language around MLEs. This includes more attention to culturally relevant pedagogy and better alignment with the new ELD Standards and the English Learner Roadmap. Despite these new standards now containing stronger MLE-affirming language, previous criticisms about lack of accountability to ensure teachers are prepared to teach MLEs effectively are still valid (Santibañez, Snyder & Centeno, 2021).

Credentialed teachers can elect to obtain a Bilingual Authorization (BA) which allows them to teach in bilingual programs. A bilingual authorization is obtained by following a CTC-approved teacher preparation program (university of district-based) and obtaining passing scores on required language exams.[16] In 2021 the CTC overhauled its Bilingual Authorization Program Standards and Bilingual Teaching Performance Expectations (BTPEs). The new standards support California's Global California 2030 goals toward having at least half of the K-12 school population in the state be bilingual or enrolled in a bilingual education program, class, or experience. The new standards went into effect in the 2025-26 academic year.[17] The new standards require teacher training programs, either university or district-based, to align with specific research-based theories on bilingual education.[18] Key changes[19]

[16] The required examinations for Bilingual Authorization include the CSET: World Languages, which consists of Subtest II or III (depending on the language) for Language and Communication, Subtest IV for Bilingual Education and Bilingualism, and Subtest V for Geographic, Historical, Sociopolitical, and Sociocultural Contexts. Additionally, CTEL Examinations cover Language and Language Structure, Assessment and Instruction, and Culture and Inclusion. Educators who possess a degree from a country in which the 'target language' was the primary language may be exempt from these requirements. Additionally, teachers who complete one of the CTC's approved bilingual programs may be able to avoid certain subtests if they possess a foreign degree with instruction in the target language or if they complete a CTC-approved bilingual education program.

[17] https://www.ctc.ca.gov/commission/newsroom/stories/2024/2024-04-bilingual-teacher-expectations

[18] The updated BA still requires that candidates must also be taught about the historical, legal, and policy frameworks that have impacted the development of bilingual education in the United States. In addition, they must be trained on culturally competent practices in the classroom, as they must understand their student's sociocultural backgrounds and create inclusive learning environments that address their linguistic and cultural needs. Students must also be taught about the importance of family and community engagement.

[19] https://regulations.justia.com/states/california/title-5/division-8/chapter-5/article-2/section-80615-3/

include 20 hours of mandatory field experiences, a requirement that teachers demonstrate an understanding of the typologies of English learner students, the different types of bilingual instruction (one-way immersion, developmental, dual-language, etc.). They require that students demonstrate an understanding of the typologies of MLEs and to learn about the different types of bilingual instruction (one-way immersion, developmental, dual language, etc.). Lastly, the new standards directly address expectations and practices around "translanguaging" and the linguistic repertoires and registers across contexts. Candidates are also now required to design and implement activities that explicitly use a transnational lens to promote learning in two languages.

Texas

Language Instructional Education Programs. In 1973, Governor Dolph Briscoe signed the Bilingual Education and Training Act, requiring bilingual education for qualifying students and abolishing English-only teaching requirements, which had been the law of Texas since 1918 (Gonzalez, 2008.). Texas requires school districts to provide bilingual education or English as a Second Language (ESL) programs for MLEs in accordance with the State Plan for Educating Emergent Bilingual[20] Students. When a district has an enrollment of 20 or more MLEs of the same language classification in the same grade level district-wide, the district must offer a bilingual education program that uses students' primary language while developing English proficiency; when this threshold is not met, the district is required to provide an ESL program (§ 89.1205[21]). Districts are required to "seek appropriately certified teaching personnel" to implement these programs, ensuring that MLEs have access to teachers certified in bilingual education or ESL, rather than requiring all teachers to hold such certification (§ 89.1201[22]). Identification of MLEs begins with the Home Language Survey, and students with a language other than English reported must be assessed using instruments approved by the Texas Education Agency (TEA) within state-established timelines to determine English language proficiency across listening, speaking, reading, and writing domains (§ 89.1225[23]). Ongoing assessment, including the Texas English Language Proficiency Assessment System and additional criteria determined by the

[20] Texas state policy language uses the term emergent bilingual or 'English learner but this report treats these designations as functionally equivalent to multilingual learners (MLEs) for analytic purposes.
[21] See Texas Administrative Code (n.d.).
[22] See Texas Administrative Code (n.d.).
[23] See Texas Administrative Code (n.d.).

Language Proficiency Assessment Committee (LPAC), is used annually to monitor progress and determine eligibility for reclassification, which requires demonstrated proficiency across all four language domains in addition to LPAC review (§ 89.1226[24]).

MLE Teacher Certification. Under 19 Texas Administrative Code (TAC, n.d.) § 89.1201, Texas policy requires school districts to "seek appropriately certified teaching personnel to ensure that [emergent bilingual] students are afforded full opportunity to master the essential knowledge and skills required by the state," (p. 2) including dual-language, transitional bilingual, and English as a Second Language (ESL) programs. According to TAC definitions in § 89.1203, a "certified bilingual program teacher" is one who holds bilingual certification and is appropriately certified for the grade level and content area, and a "certified English as a second language teacher" is one appropriately certified in ESL as well as the grade level and content area. Consistent with TEA's bilingual/ESL certification guidelines, teachers serving in bilingual education program assignments must hold the state-required content/grade level certificate plus a bilingual education certification, which includes demonstrated target language proficiency, whereas teachers serving in ESL program assignments must hold the appropriate content/grade level certificate and an ESL supplemental certification or hold bilingual certification that covers ESL assignments. If a district cannot provide a certified teacher for a particular assignment, the district must request a bilingual program exception or an ESL waiver under § 89.1207 to temporarily place a teacher who does not yet meet full certification requirements (TAC, n.d). Notably, these requirements are embedded in statute and administrative code, establishing a uniform, statewide baseline for those who may serve as a teacher of emergent bilingual students and limiting local discretion over certification expectations. To become an ESL/bilingual certified teacher in Texas, educators must successfully pass certification exams that include content and grade area in addition to bilingual education competencies (Texas Education Agency [TEA], n.d.-a, b, c).

The competencies required by the Texas bilingual certification examination demonstrate substantive and consistent alignment with all of the framework domains (see Table 1), with the exception of practicum, which are addressed through state-required educator preparation requirements. Across domains, the Texas assessment framework emphasizes both theoretical knowledge and applied instructional competence necessary for effective teaching of MLEs. Examples of

[24] See Texas Administrative Code (n.d.).

the assessed competencies and their corresponding alignment with the framework are presented in Table 3.

Graduation Rates. Two recent studies using the same Texas statewide longitudinal administrative dataset provide compelling insights into the educational trajectories of MLEs in the state (Callahan et al., 2024; Schudde et al., 2025). Both studies employ a longitudinal "ever-English learner" construct, capturing students identified as MLEs at any point during K–12 schooling, and follow full cohorts of Texas public high school seniors into postsecondary education. Across both analyses, findings are consistent: ever-MLE students in Texas are at least as likely as never-MLE peers to graduate from high school (91% and 94%, respectively; Callahan et al., 2024) and to enroll in college (63% and 68%, respectively, indicating strong persistence and educational aspirations even after students exit MLE status. At the same time, both studies document systematic stratification in postsecondary enrollment, with ever-MLE students disproportionately enrolling in two-year institutions (42% of ever-ELs compared to 36% of never-ELs) and less likely to initially enroll in four-year colleges (21% of ever-ELs compared to 31% of never-ELs), even after accounting for demographic and academic characteristics.

The studies differ in analytic scope in ways that deepen interpretation of these shared findings. Callahan et al. (2024) focus on the transition from high school to postsecondary education, demonstrating that graduation and college-entry outcomes can obscure inequality when MLE status is measured only at a single point in time. Schudde et al. (2025) extend this work by tracing postsecondary trajectories in greater detail, showing that early sorting into the two-year sector has cumulative consequences for persistence, transfer, and degree attainment over time. Importantly, while ever-MLE students often perform similarly to never-MLE peers within institution type, unequal sorting across institutional sectors results in durable disparities in long-term degree outcomes.

The Texas case illustrates how graduation and college-entry outcomes for MLEs can coexist with durable stratification in postsecondary pathways, underscoring the importance of distinguishing between surface indicators of success and the structural features that shape educational trajectories over time. While comparable longitudinal evidence tracing postsecondary pathways is not available for all states, this analytic distinction remains critical for interpreting outcomes elsewhere. In the following section, we examine Indiana, a state that also demonstrates relatively strong outcomes for MLEs, to

assess how teacher preparation policies align with research-based principles and may shape students' educational opportunities beyond high school.

Indiana

Language Instructional Education Programs. Indiana requires all local education agencies (LEAs) to identify, assess, and serve MLEs in alignment with federal and state standards to ensure meaningful access to educational programs and development of English proficiency (Indiana Department of Education [IDE], 2024). The MLE program models include English as a Second Language, Content-Based English Language Development, Sheltered English Instruction, transitional bilingual, dual language, heritage language, and newcomer programs (IDE, 2024). Upon enrollment, every student completes a Home Language Survey (HLS); if a language other than English is indicated, the student must be assessed using a WIDA placement assessment such as the WIDA Screener within established timelines to determine eligibility for MLE services, including individualized English language development instruction and corresponding Individual Learning Plans (ILPs) (IDE, 2024). Identified MLEs participate in the annual WIDA ACCESS for ELs assessment to monitor progress across the domains of listening, speaking, reading, and writing and to inform decisions regarding continued service or exit from MLE status based on proficiency criteria. LEAs must also disseminate required parent notification regarding program placement and provide appropriate academic programming until ELs meet exit criteria, after which students are monitored to ensure sustained success (IDE, 2024). Indiana's guidance emphasizes both compliance with Every Student Succeeds Act (ESSA) requirements and an asset-based perspective that recognizes the linguistic diversity of its students, often referring to learners as *multilingual learners* (IDE, 2024)

MLE Teacher Licensure and Preparation. Under Indiana policy, LEAs must ensure that MLEs receive English language development instruction from a qualified MLE teacher of record as defined by state guidance and federal civil rights obligations (IDE, 2024). The IDE specifies that MLE teachers of record must either hold an English as a New Language (ENL) Professional Educator License or meet the state's MLE Teacher of Record Rubric, which documents equivalent preparation and experience and is verified by the LEA (IDE, 2024b). Teachers seeking ENL licensure must already hold an Indiana teaching license in an appropriate grade band and complete an approved ENL preparation program, which

includes specialized coursework and supervised field-based experiences focused on MLE instruction, as well as passage of the required MLE Praxis examination (IDE, 2024). Although specific program requirements vary by institution, ENL preparation programs commonly include approximately 15 credit hours of coursework addressing second language acquisition, linguistics, sociocultural foundations, assessment of MLEs, and instructional methods, along with practicum or student teaching experiences in settings serving MLEs.

Indiana's licensure structure aligns with López and Santibañez's (2018) criterion emphasizing a distinct specialist pathway with explicit pedagogical preparation for teachers responsible for MLE instruction. The required Praxis examination assesses knowledge of linguistics, second language acquisition, MLE-specific pedagogy, assessment practices, and legal responsibilities, reflecting a specialist-oriented preparation model consistent with the framework's emphasis on content-specific expertise prior to independent classroom practice (López & Santibañez, 2018).

If an LEA cannot staff a position with a fully ENL-licensed teacher, it must document interim measures and ensure that the assigned educator either meets the MLE Teacher of Record Rubric criteria or is actively progressing toward ENL licensure, thereby maintaining compliance with federal and state requirements for MLE service provision (IDE, 2024b).

Similar to Texas, the Indiana competencies required by the Praxis examination demonstrate substantive and consistent alignment with all of the framework domains (see Table 1), with the exception of practicum, which are also addressed through state-required educator preparation requirements. Across domains, the Indiana assessment framework emphasizes both theoretical knowledge and applied instructional competence necessary for effective teaching of MLEs. Examples of the assessed competencies and their corresponding alignment with the framework are presented in Table 3.

Taken together, Indiana's ENL licensure pathway and Teacher of Record rubric demonstrate alignment with several core elements of the López and Santibañez (2018) framework, particularly the emphasis on specialist certification pathways, structured coursework in language and pedagogy, assessment literacy, and supervised clinical experience. However, Indiana's current framework does not require all mainstream classroom teachers to complete equivalent MLE-focused coursework or demonstrate MLE-specific competencies beyond general pedagogical preparation. This contrasts with

López and Santibañez's ideal model, which emphasizes shared responsibility among both specialist and mainstream educators for delivering linguistically responsive instruction across instructional contexts. In contrast to Texas's statutory approach but similar to California, Indiana relies primarily on licensure guidance and locally verified compliance mechanisms, granting LEAs greater discretion while maintaining expectations for specialist preparation through licensure and Teacher of Record criteria.

Graduation Rates. Indiana reported a record-setting graduation rate for MLEs of 92% in 2025, an increase from the 89% reported in 2024 (IDE, 2026). For non-MLEs, the graduation rate also increased from 90% in 2024 to 92% in 2025. A request to the IDE for ever-MLEs resulted in 93% (compared to 94% for never-MLEs).

Table 3

Texas, Indiana, and California Competencies in Assessments Required for Teachers of MLEs

Framework Domain	Texas Assessment Competencies[25]	Indiana ENF Praxis Competencies[26]
L1 Literacy	"…providing multiple, meaningful exposures to new words in both Spanish and English and facilitating cross-linguistic connections to promote biliteracy and support students' linguistic and academic progress." p. 817-4	"Understands how first-language literacy influences the development of English literacy." "Understands effective practices for teaching literacy to English learners." p. 8
ESL / ELD	"Demonstrate knowledge of evidence-based and research-based strategies and resources to promote comprehension of content-area instruction for emergent bilingual students at various levels of proficiency in Spanish and English." p. 817-3	"Understands the processes of second-language acquisition, including research-based models." p. 7 "Understands various methods and approaches in teaching ELs and knows how to select the most appropriate methods for the context." p. 7
Curriculum	Demonstrate knowledge of how to apply the Texas state-approved English Language Proficiency Standards (ELPS) to internalize and deliver high-quality learning activities and lesson plans that support development of listening and reading skills in English." p. 817-3	"Understands the importance of language modeling, comprehensible input and output, and scaffolding for English language learning." p. 10 "Knows how to identify appropriate and measureable objectives that align to language and content standards." p. 9

[25] Texas Education Agency, 2025.
[26] Educational Testing Service, n.d.; Indiana Department of Education, 2024.

Assessment	"Demonstrate knowledge of a variety of assessments (e.g., formal, informal) that are linguistically responsive and that allow emergent bilingual students flexibility in demonstrating content and linguistic knowledge." p. 817-2	"Knows how to design appropriate assessments that connect to learning objectives for ELs." p. 9 "Is familiar with the role of assessment in the identification, placement, and exit from language-support programs." p. 12
Linguistics	"Apply knowledge of phonology, morphology, syntax, and semantics to promote emergent bilingual students' foundational language skills in listening comprehension and reading in both Spanish and English." p. 817-3	"Understands phonetics, stress and intonation patterns, and the effects of phonetic environment on pronunciation." p. 6 "Understands the concepts of sociolinguistics." p. 6
Cultural & Linguistic Diversity	"Demonstrate knowledge of major federal and state legislation and court cases (e.g., the Civil Rights Act of 1964, the Bilingual Education Act [BEA], Lau v. Nichols, San Antonio ISD v. Rodriguez, Plyler v. Doe, Santamaria v. Dallas ISD)." p. 165-3	"Understands the interrelationship between language and culture." p. 12 "Understands the difference between acculturation and assimilation." p. 12
Practicum	Under 19 TAC § 228.61 (Educator Candidate Clinical Experiences), the Texas Education Agency requires that educator preparation programs provide clinical teaching, internship, residency, or an equivalent supervised experience for certification candidates.	Under Indiana Administrative Code Title 511, Article 15, Rule 1, a "minimum of ten (10) weeks of full-time student teaching with an effective teacher who holds a professional, proficient, practitioner, or accomplished practitioner license during the later stages of the program."

Comparative Synthesis

All three states demonstrate strong alignment with the research-based framework through mandatory competency requirements that formally assess pedagogical, linguistic, and policy knowledge prior to or concurrent with service as a specialist teacher of MLEs (see Table 3). California's requirements are embedded in coursework and the edTPA[27] assessment whereas in Texas and Indiana, candidates serving MLEs must pass a separate state-mandated English as a Second Language (ESL) and/or bilingual assessment in addition to content area. Accordingly, in both Texas and Indiana, required testing functions as a gatekeeping mechanism that externalizes verification of core competencies, reducing reliance on program-level discretion alone and strengthening coherence between research-based preparation principles and state policy design (López & Santibañez, 2018). That is, California does not require a standalone certification or licensure examination that externally verifies MLE–specific pedagogical, linguistic, and assessment competencies aligned with the framework in Table 1. Instead, California relies on programs delivering coursework in ways that build strong skills and competencies through embedded MLE authorization and program approval standards. Because the main post-preparation program check (induction) is not MLE-specific, there is no assessment event post credential that ensures these skills/competencies have been met. This may potentially introduce greater variation in the depth and coherence of teacher preparation across credential pathways.

Teacher Preparation: Implications for California Policy

Issues surrounding the lack of access to grade-level content instruction and the need to expand bilingual programs were raised in a previous report focused on improving MLEs' outcomes in California (Umansky, 2018). Teacher preparation policy in California continues to require an intentional alignment with other domains that ensure that expectations for educator knowledge and practice are coherent with state policies governing assessment, accountability, instructional models, and student classification, so that improvements in teacher capacity translate into meaningful changes in students' educational experiences.

López and Santibañez (2018) identified teacher preparation requirements as a critical lever shaping instructional capacity for MLEs, emphasizing the importance of explicit specialist pathways,

[27] https://www.edtpa.com/PageView.aspx?f=GEN_California.html

substantive coursework, assessment literacy, and supervised clinical experience. Although they also identified state policy regarding LIEPs as a critical lever that provides assurances (albeit with limitations of their own) to MLEs, Indiana serves as an example that robust teacher preparation requirements do not necessarily require prescribed bilingual LIEPs. That said, California's policies that emphasize inclusive instruction, bilingualism, and shared responsibility for multilingual learning suggest adopting a model that prioritizes access to bilingual education, as in Texas. Namely, in Texas, the existing policy environment is such that a numerical trigger explicitly requires access to bilingual education while providing flexibility given the wide variability of contexts. The policy requirement translates into clearly delineated bilingual and ESL certification pathways, requiring teachers serving MLEs to complete formal preparation in second language acquisition, linguistically responsive pedagogy, and language development assessment. In Texas, nearly 40% of MLEs are in bilingual (transitional or dual-language immersion; see Table 4) classrooms, likely an artifact of the state LIEP policy.

Table 4

Enrollment of MLEs in LIEPs in Texas, Indiana, and California (2021-2022)

LIEP Type	TX n	TX %	IN n	IN %	CA n	CA %
			1815			
Content Classes with integrated ESL support	116803	11	1	26	985857	43
Dual Language or Two-way Immersion	212557	19	1894	2	101515	4[28]
			5088		106811	
ESL or ELD	500953	46	9	71	4	47
Newcomer					17136	1
Other	45936	4	4	0	28860	1
Transitional bilingual	216514	20	6	0	93748	4
	109276		7094		229523	
Total MLEs	3		4		0	

Source: Consolidated State Performance Reports, 2021-2022.

[28] According to Californians Together, the figure was 9% using 2022 Title III DoE data. Source: https://californianstogether.org/state-of-english-learners/

Indiana offers a model that aligns with the framework used in this report but differs from Texas in its reliance on guidance and local verification rather than statute to enforce specialist preparation requirements. Although Indiana does not mandate universal specialist certification for all teachers of MLEs (evident in the absence of MLEs in bilingual programs; see Table 4), the state requires that MLE Teachers of Record hold a specialized license or meet documented criteria demonstrating equivalent preparation. This structure preserves a distinct specialist role, emphasizes targeted coursework and assessment of content knowledge through licensure exams, and incorporates supervised practicum experiences focused on MLE instruction.

Key Recommendations for California Policy

The comparative analysis of Texas and Indiana underscores that California's current approach to teacher preparation for MLEs is not misaligned in intent but is structurally weaker in enforcement, coherence, and depth. Both Texas and Indiana operationalize research-based competencies for MLE instruction by establishing clear specialist policies that inform pathway requirements, which are externally verified through licensure or certification exams, and anchored in explicit linguistic, pedagogical, and assessment knowledge. In contrast, California relies primarily on a universal authorization model embedded within multiple and single subject credentials, enforced through program approval standards rather than MLE-specific verification of competencies through a dedicated assessment. This approach promotes broad responsibility for MLEs but permits substantial variation in how and how well core competencies are assessed across preparation programs.

California's policy framework, which is enhanced by the English Learner Roadmap, integrated and designated ELD standards, and recent literacy reforms, articulates a strong vision for linguistically responsive instruction. The mechanisms through which this vision is operationalized, however, rely heavily on local discretion and program-level implementation, resulting in uneven access to bilingual education and substantial variation in the depth and coherence of teacher preparation across the state. Prior evidence from analyses of California's teacher preparation and induction systems (Santibañez & Snyder, 2018) suggests that while expectations for supporting multilingual learners are widely articulated, there are few consequential mechanisms to ensure that teachers can consistently demonstrate evidence-based instructional competence in practice. In particular, the state's reliance on

embedded coursework and formative induction processes has expanded exposure to MLE-related content without establishing clear, enforceable standards for proficiency. This underscores an unaddressed need for stronger accountability within preparation and credentialing systems.

Institute formal, statewide verification of evidence-based MLE instructional competencies.

One recommendation concerns the absence of a formal, statewide assessment mechanism or an induction-related process in California to verify the evidence-based domains of knowledge associated with MLE success. Both Texas and Indiana employ licensure examinations that function as gatekeeping tools, externally validating teachers' pedagogical, linguistic, assessment, and policy knowledge prior to or concurrent with service. California currently relies on program approval standards and embedded coursework to develop these competencies but does not require candidates to demonstrate them through a common, externally assessed benchmark *specific* to the needs of MLEs. The aforementioned requirement of a MLE specialist licensure could rely on the existing testing requirements in California (i.e., CSET exams), which are aligned explicitly to the research-based framework used in this report. Alternatively, CBEST and CSET (as well as edTPA) could explicitly include EL-specific content that would strengthen coherence between preparation policy and instructional expectations.

Integrating specialist expertise and shared responsibility across the teaching workforce.

Importantly, the comparative evidence suggests that California need not choose between specialist and generalist models of preparation but should integrate the strengths of both. Texas and Indiana illustrate the value of specialist pathways with verified competencies, while the research base synthesized in this report underscores the importance of shared responsibility among all teachers for linguistically responsive instruction. California is well positioned to advance a hybrid model that preserves its universal authorization while strengthening differentiation of roles, verification of specialist expertise, and expectations for practice-based learning aligned with MLE instruction. This approach would address the documented gap between policy vision and instructional enactment

without abandoning California's commitment to systemwide responsibility for multilingual learners.

Part II: MLE Funding Policy and Resource Use: Design Principles from Texas and Indiana for Consideration in California

California's ongoing efforts to improve support for English learners raises a natural question about what the state can learn from other states. In the first part of this report, we showed that Texas and Indiana stand out for their strong English learner outcomes. An important question, however, is why these states perform well with their MLE student populations. In this part of our report, we focus on one potential contributing factor to this success, namely state funding policy supporting English language and bilingual education (Griffith & Burns, 2025; Villegas, 2023; Kaplan, 2025).

To understand the potential ways in which funding policy might contribute to improving outcomes for English learners, we attend to two related but distinct dimensions of K-12 school finance policy. The first is the funding level of policy, which concerns how much money is allocated to support MLE students and through what mechanisms, including funding weights, eligibility rules, and program incentives (Griffith & Burns, 2025; Villegas, 2023; Education Commission of the States, 2020). The second is resource use, which concerns how districts actually deploy funds provided by state funding policy, including accountability structures managing whether money reaches intended students, including investments in the workforce, programming, and physical infrastructure needed to translate funding into effective services for English learners and emerging bilingual students (Lafortune et al., 2023; Johnson, 2025). A state can have well-designed funding policies that fail to improve outcomes if resources are not used effectively, and conversely, strong accountability systems that shape resource use cannot overcome fundamentally inadequate levels of funding.

We examine both dimensions as they apply to MLE students and bilingual education in Texas and Indiana. By comparing these states' approaches with California's Local Control Funding Formula, we identify potential lessons for California policymakers. In our review, it is important that we note that all states included in this comparative review of policies, California, Indiana, and Texas, face significant ongoing challenges in equitably and adequately supporting the education of English Learners and

emerging bilingual students. Therefore, we consider this review an exercise in identifying potentially useful design principles rather than complete models for replication.

The Importance of Adequate Funding and Strategic Resource Use

Adequate funding levels. Research demonstrates that adequate funding is a critical component of any high-quality and effective educational system (Baker, 2018; Jackson et al., 2016). In K-12 educational finance, adequate funding refers to the level of resources necessary for school district and educational leaders to meet constitutionally mandated standards of public education (Baker & Green, 2015; Griffith & Burns, 2025). In practice, adequacy is typically judged by considering students' opportunity to achieve proficiency on state content and performance standards as assessed through standardized tests (Baker & Green, 2015; Griffith & Burns, 2025). A substantial body of research demonstrates that increased school spending improves student outcomes, with these effects most pronounced for students from economically disadvantaged and historically marginalized backgrounds (Jackson et al., 2016; Johnson, 2025).

For English learners specifically, research suggests that meaningful additional resources are needed to provide appropriate language instruction, specialized staff, curriculum materials, and family engagement supports (Gandara & Rumberger, 2008; Jimenez-Castellanos & Topper, 2012; Srikanth, 2024; Knight & DeMatthews, 2017). A Learning Policy Institute review of five adequacy studies conducted between 2016 and 2023, for example, found that recommended additional funding weights for English learners ranged from 15% to 40% above base funding levels (Griffith & Burns, 2025).

Beyond the funding level itself, research emphasizes the importance of how funding formulas are designed to allocate resources (Griffith & Burns, 2025; Villegas, 2023; Kaplan, 2025). Effective formula design for MLE students includes several key principles. First, differentiated funding based on student proficiency levels or program type recognizes that students at different stages of language acquisition and in different program models require different levels of support (Griffith & Burns, 2025; Villegas, 2023). Second, dual funding that allows students who are both English learners and low-income to generate funding under both categories acknowledges the compounding challenges these students face. Currently, 37 of the 42 states with both MLE and at-risk funding streams allow dual funding (Kaplan, 2025).

Third, concentration adjustments for districts serving high proportions of MLE students recognize the additional coordination costs and specialized infrastructure required when English learners constitute a large share of enrollment (Morgan, 2022). Fourth, continued funding support for students after reclassification acknowledges that former English learners may still benefit from additional services during the transition period and removes financial disincentives for timely reclassification (Villegas, 2023; Sugarman, 2021). Fifth, program-based incentives that provide higher funding weights for evidence-based models, like dual language immersion, can encourage districts to adopt instructional approaches with stronger research support (Zabala, 2022).

Strategic resource allocation. While adequate funding levels and well-designed formulas are necessary conditions for improving MLE outcomes, they are not sufficient. Research increasingly emphasizes how money is spent matters as well (Lafortune et al., 2023; Lee et al., 2022; Blagg et al., 2022). This concern is particularly salient for targeted funding streams like those intended for English learners. For example, research from California's LCFF implementation found that "incomplete targeting of funds dilutes the funding impact of LCFF on high-need students, limiting the extent to which LCFF can affect achievement gaps" (Lafortune et al., 2023, p. 3). The same study found that nearly 60% of districts reported plans to spend less on high-need students than the additional funding they received for those students, raising questions about whether supplemental funds actually translate into supplemental services.

Research also demonstrates which types of spending are most effective. A comprehensive study of California's LCFF found that "[s]chool input changes can explain roughly 84% of the variation in school spending effectiveness, with three school inputs seeming systematically to matter most: reductions in class size, increases in teacher salaries, and reductions in teacher turnover" (Johnson, 2025, p. 29). This finding underscores that funding translates into improved outcomes primarily through investments in instructional quality, particularly teacher recruitment, retention, and support. For English learners specifically, this underscores the importance of resource allocation (Gandara & Rumberger, 2008). Specifically, it means that increased funding should be accompanied by investments in the bilingual and ESL teacher pipeline, as funding cannot improve outcomes if qualified teachers are not available to deliver instruction.

Finally, effective resource allocation requires accountability mechanisms that ensure funds reach their intended beneficiaries. This includes transparent tracking of how supplemental funds are spent, minimum spending requirements on direct services, and reporting requirements that allow stakeholders to assess whether funds are being used as intended. As Lafortune and colleagues note (2023), "to better measure the effectiveness of funds in helping high-need students, the state should improve data on within-district spending and consider adding reporting for school sites" (p. 3). Without such mechanisms, additional funding may be absorbed into general operations rather than producing the targeted services that improve outcomes for English learners.

Funding Policy for MLEs in Texas

Texas serves over 1 million English learners, representing roughly 20% of the state's total student population. Texas has the second largest MLE population of any state (second only to California) and the highest composition of MLE students of a state’s student composition. The state has a long history of bilingual education policy and funds MLE education through the Bilingual Education Allotment, which provides weighted funding through the state's Foundation School Program (Tex. Educ. Code § 48.105, 2024). The program provides a basic weight of 0.10 for bilingual and ESL programs (TEA, n.d.). Research consistently indicates this weight is insufficient, with studies recommending weights of 0.40 to align with actual program costs (Craven, 2019).

In 2019, the passage of House Bill 3 introduced important structural reforms to the Bilingual Education Allotment (Texas Legislature, 2019; TEA, n.d.). The legislation introduced tiered funding based on program models, with students in dual language immersion programs receiving a weight of 0.15, which is 50% higher than other programs, while transitional bilingual and ESL programs retain the 0.10 weight. This structure creates financial incentives for districts to adopt research-based DLI programming (TEA, n.d.; Zabala, 2022).

HB 3 also assigns a 0.05 weight to non-MLE students enrolled in two-way dual language programs, incentivizing integrated models that bring together native English speakers and native speakers of the partner language. However, critics contend that this funding structure overlooks the majority of Texas's MLE population. Because roughly 80% of MLE students attend school districts without dual language programs, they stand to gain little from HB 3's additional allocations (Craven,

2019). Additionally, HB 3 created an Early Education Allotment that provides an additional 0.1 weight for K-3 students who are either economically disadvantaged or in bilingual/ESL programs, with a 0.2 weight for students who meet both criteria (Texas Education Agency, n.d.).

Resource Use in Texas

To ensure categorical funding translates into meaningful support for MLE students, Texas has established accountability mechanisms that tie dollars to services and programs. HB 3 increased the minimum spending requirement for BEA funds on bilingual and ESL programs from 52% to 55%, with expanded reporting requirements and enforcement mechanisms (Texas Education Agency, 2024, p. 3). TEA monitors compliance by examining the percentage each district spends on direct program costs.

Texas has also invested in state-level infrastructure to support effective resource use, including the Texas Effective Dual Language Immersion Framework (TxEDLIF), the Emergent Bilingual Student Web Portal (TXEL.ORG), and comprehensive professional development resources through regional Education Service Centers (Texas Education Agency, TXEL Portal). This infrastructure supports districts in translating funding into quality programming. Additionally, in 2023, Texas released the *Emergent Bilingual Strategic Plan* (Texas Education Agency, 2023).

Ongoing Challenges

Despite these structural innovations, Texas faces significant ongoing challenges in both funding policy and resource allocation. On the funding side, researchers and advocates consistently characterize overall investment as inadequate. Knight and DeMatthews (2017), for example, find that "district funding for bilingual education programs is inadequate in Texas and across districts nationally," with high-MLE districts receiving approximately the same level of state and local funding as low-MLE districts after various adjustments (p. iii). Their analysis reveals a troubling pattern: districts where MLEs comprise roughly 22% of students actually received slightly less state and local funding per pupil ($9,000) than districts serving virtually no MLEs ($9,100). The Intercultural Development Research Association (IDRA), an independent nonprofit focused on educational equity, raises similar concerns.

While research recommends a 40% funding adjustment to support effective English learner programs, Texas's 0.10 base weight falls far short of this benchmark (Craven, 2019).

On the resource use side, teacher shortages continue to undermine the state's ability to deliver quality programming even where funding is available. Bilingual educators have been identified as a shortage field in Texas every year since 1990 (Texas Association of School Boards, 2023; Texas Education Agency, n.d.). The Texas State Board for Educator Certification reported that in 2006 alone, 867 teachers working in bilingual classes lacked required certification, potentially affecting over 17,000 students (Cortez & Johnson, 2008).

Funding Policy for MLEs in Indiana

Indiana offers a different case study that illustrates both a promising funding policy design principle and the consequences of inadequate funding levels and weak resource use accountability. Indiana provides MLE funding through a flat allocation ranging from $384 to $550, with amounts depending on the student's level of English language proficiency (Indiana Department of Education [IDOE], 2024; Ind. Code § 20-43-10-4, 2023). This tiered approach based on proficiency represents a recognition that students at different stages of language acquisition may require different levels of support. Unlike many states that provide a single flat weight or amount regardless of student characteristics, Indiana's system acknowledges in its design that the cost of educating English learners varies based on their proficiency level. Students demonstrating lower English proficiency generate more funding to support more intensive services (IDOE, 2024).

Indiana uses a foundation formula funding system in which the MLE allocation sits alongside other adjustments for student needs such as special education and at-risk students. The state uses the WIDA ACCESS assessment to measure English language proficiency and track student progress toward reclassification (Ind. Code § 20-43-10-4, 2023).

Resource Use in Indiana

Indiana provides guidance to local education agencies (LEAs) on allocating resources and staffing to support English Learners (ELs) through policy memoranda and comprehensive guidance

documents from the Department of Education. For example, in August 2019, Indiana Superintendent of Public Instruction Dr. Jennifer McCormick, along with the Indiana Department of Education's (IDOE) Office of Title Grants and Support, issued guidance clarifying staffing requirements for EL programs to ensure compliance with federal civil rights law (McCormick et al., 2019). The memorandum responded to the Every Student Succeeds Act (ESSA), building on legal precedents established by Title VI of the Civil Rights Act of 1964, *Lau v. Nichols* (1974), and *Castañeda v. Pickard* (1981) (McCormick et al., 2019, p. 1). As described in Part I of this report, Indiana, state guidance established that every MLE is entitled to instruction from an ENL-certified "EL Teacher of Record." The guidance further recommends that caseloads not exceed 30 students and clarifies that EL students must receive English language development services for 30–45 minutes daily, 4–5 days per week, beyond standard English Language Arts instruction (McCormick et al., 2019, p. 2). The memo further specified that LEAs may fund coursework and professional learning for teachers through Title I, Title II, Title III, the Non-English Speaking Program (NESP), or other federal, state, and local funding streams to meet these requirements (McCormick et al., 2019, p. 3).

IDOE also publishes an *English Learner Guidebook*, updated annually, which serves as a reference for district and school personnel on topics including EL identification, program models, staffing requirements, assessment, funding sources, and federal accountability measures (Indiana Department of Education [IDOE], 2024). This guidebook and additional EL resources, including program evaluation toolkits, compliance documents, and professional learning opportunities, are available through the IDOE Office of English Learning and Migrant Education website (IDOE, n.d.).

Significant Challenges in Both Dimensions

On funding adequacy, school administrators testifying before the state legislature in 2022 stated that fully funding English language learners would require $54 million more in funding, double what Indiana appropriated at the time (Smith, 2022). This testimony is informed by larger trends in state funding. For example, Indiana relies on a “complexity grant” program to support the education of students from low income families. The state's "complexity grant” has seen funding decline by 39% since 2015, dropping from $1.15 billion to approximately $700 million (Hinnefeld, 2023). In 2021, the

Indiana state legislature eliminated the English language learner adjustment from the complexity formula calculation entirely (Weddle, 2021).

On resource use, the reduction in complexity grants to districts has created challenges for districts attempting to meet the needs of increasingly diverse student populations. Statewide, for example, approximately 16% of complexity grant dollars were used to backfill special education and MLE costs in the 2021-2022 school year (Smith, 2022). These challenges persist while Indiana's MLE population has grown by more than 50% since 2017, with English learners now comprising more than 6% of the state's total student population (Smith, 2022). Despite some improvement in English learner proficiency rates in 2022, state data showed that proficiency rates continue to be below grade level peers, with academic progress falling behind peers. Most recently, English learner students saw ELA scores drop by 1.1 percentage points in 2025, with math scores improving by 0.6 percentage points (Fradette, 2025). It is important, however, to remember test scores are only one indicator of educational outcomes for students.

How Does California Differ from Texas and Indiana?

California's Local Control Funding Formula, enacted in 2013, represented a significant reform to the state's school finance system (Bruno & Kim, 2024). Research from the Learning Policy Institute found that LCFF funding increases have positively impacted student outcomes, with spending increases leading to a full grade-level improvement in math and reading after three years of $1,000 per-pupil increases (Kaplan, 2025, p. 2). However, California faces challenges in both funding policy and resource use that may limit LCFF's effectiveness in supporting English learners (Kaplan, 2025).

Funding Policy Differences

Perhaps the most significant funding policy difference is California's use of "unduplicated" pupil counts. Under LCFF, English learners, low-income students, and foster youth are grouped together for supplemental funding purposes, and each student can only be counted once regardless of how many categories they fall into (California Department of Education, n.d.). This means districts receive no additional funding for students who are both MLE and low-income. In contrast, 37 of 42 states that provide funding for both MLE and at-risk students allow "dual funding" in which students meeting both criteria generate funding under each category (Kaplan, 2025, p. 7).

California's supplemental grant also provides a relatively low funding weight of 20% for high-need students, whether they are MLE, low-income, or foster youth (California Department of Education, n.d.). This falls at the lower end of recommended ranges from adequacy studies, which suggest 15-40% more funding for MLEs above baseline funding levels (Griffith & Burns, 2025). The Learning Policy Institute notes that "the supplemental grant weight of 20% was not designed to provide the level of funding required to support students with greater needs" (Kaplan, 2025, p. 4).

Unlike Texas, California does not differentiate funding based on the type of language instruction program (Kaplan, 2025, p. 9). A district receives the same supplemental funding regardless of whether students are enrolled in a research-based dual language immersion program or receive minimal ESL pullout services. Texas's higher weight for DLI programs creates a financial incentive to expand these evidence-based programs (Zabala, 2022). Similarly, unlike Indiana's design principle of proficiency-differentiated funding, California provides the same funding weight regardless of a student's English proficiency level (Bruno & Kim, 2024).

Resource use challenges. California also faces significant challenges in translating funding into effective services. The state's bilingual teacher pipeline was devastated by Proposition 227 (1998), which mandated English-only instruction and dismantled bilingual teacher training programs. Before Prop 227, approximately 30% of MLEs were served by bilingual programs; a decade later, this had dropped to just 5% (Carver-Thomas & Darling-Hammond, 2017). Though Proposition 58 repealed these restrictions in 2016, the effects persist. Only 1,011 new bilingual authorizations were issued statewide in 2022-23, and only 7 Vietnamese authorizations despite it being the second-most-common language among California MLEs (Mathewson, 2024). As a result, California enrolls only about 10% of its English learners in bilingual programs, compared to nearly 40% in Texas (Williams, 2025; Mathewson, 2024).

California's policy guidance for English learners is important when considering how the state support educational leaders to allocate resources, but it is also largely non-binding. The state's EL Roadmap, adopted in 2017, established a comprehensive vision but explicitly states:

> “The guidance in the *CA EL Roadmap* is not binding on local educational agencies or other entities. Except for statutes, regulations, and court decisions that are referenced herein, the document is exemplary, and compliance with it is not mandatory. (See Education Code Section 33308.5.)” (California Department of Education, 2017, p. 2)

Unlike Texas, which has established formula-based incentives that automatically flow to districts implementing dual language programs, California has relied primarily on one-time competitive grants. In 2021, California created the Dual Language Immersion Grant (DLIG) program, allocating $10 million to expand bilingual education. This funding has now been exhausted with only one proposal for new funding (California Department of Education, n.d.).

Finally, California's accountability system provides limited assurance that supplemental funds reach English learners. The state's financial system does not explicitly track the use of supplemental and concentration funds, nor the students or school sites on which the funding is spent. A research study published by the Public Policy Institute of California (PPIC) found that nearly 60% of districts in 2021-22 reported plans to spend less on high-need students than the additional funding they received for those students (Lafortune et al., 2023), raising concerns about the use of funds designed to support English language learners and other students with exceptional needs.

Potential Policy Recommendations

Based on the comparative analysis of MLE funding policies across Texas, Indiana, and California, and informed by research on funding adequacy, California policymakers should consider the following six principles for funding design and resource allocation. The recommendations are organized into two categories reflecting the two dimensions of this analysis: (1) funding policy reforms that address how much money is allocated and through what mechanisms, and (2) resource use reforms that address how districts deploy funds and whether they translate into effective services.

Funding policy reforms.

Allow dual funding for students who are both MLEs and low-income. California's LCFF uses "unduplicated" pupil counts, meaning students can only be counted once for supplemental funding regardless of how many high-need categories they fall into. Approximately 85% of California's English learners also qualify as low-income (Jacobson et al., 2025), meaning districts receive no additional funding for students facing both language barriers and economic disadvantage. These students face compounding challenges that require additional resources to address. Currently, 37 of the 42 states with both MLE and at-risk funding streams allow "dual funding" in which students meeting both criteria

generate funding under each category (Griffith & Burns, 2025). California is one of only five states using unduplicated counts for these overlapping categories. This recommendation aligns with past work published by the Learning Policy Institute, which recommends that California use duplicated student counts to determine school districts' supplemental grants to target supplemental funding to school districts enrolling students facing multiple challenges (Kaplan, 2025). PPIC modeling shows this change would cost approximately $1.7 billion and increase revenues by about 2 percent across all districts, with the greatest impact felt by districts serving the highest percentage of high need students (Lafortune et al., 2025, p. 15).

Increase the MLE funding weight. California's 20% supplemental grant weight is not specific to English learners and applies broadly to all "high-need" students, including low-income students and foster youth. This weight falls at the lower end of what research suggests is necessary to adequately support English learners (Griffith & Burns, 2025). The funding weight was also not designed based on an analysis of what it actually costs to provide effective MLE services (Kaplan, 2025). For example, Kaplan (2025) notes that California's 20% supplemental grant weight "is at the lower end of the recommended range for English learners (from 15% to 40%) and below the recommended range for at-risk students (from 30% to 81%)" based on five adequacy studies conducted in other states (p. v). These studies' recommended weights translated into nearly $6,500 in additional funds per pupil in the District of Columbia and more than $9,900 per pupil in Delaware and Maryland for students who are both English learners and at-risk. California's 20% supplemental grant weight translated into additional funding of about $2,100 per student, substantially below these levels (Kaplan, 2025, p. v). Both Texas and Indiana illustrate that funding levels matter as much as funding structures. Texas's ongoing challenges despite innovative program incentives, and Indiana's declining outcomes despite proficiency-differentiated allocations, demonstrate that design principles alone are insufficient without adequate overall funding.

Create formula-based incentives for dual language programs. California currently provides the same supplemental funding regardless of whether students are enrolled in evidence-based dual language immersion programs or receive minimal ESL pullout services. The state has relied on one-time competitive grants totaling $10 million over three years to expand bilingual education, and these funds have now been exhausted (California Department of Education, n.d.). Only 10% of California's MLEs are

enrolled in bilingual programs, compared to 40% in Texas (Williams, 2025; Mathewson, 2024). Without sustained formula-based incentives, program expansion has stalled.

Research suggests that dual language immersion programs produce better outcomes for MLEs. For example, the largest random-assignment study of DLI education, conducted by Steele and colleagues (2017) in Portland Public Schools, found that students in DLI programs outperformed their peers on state reading tests by 13% of a standard deviation in grade 5 and by 22% of a standard deviation in grade 8, reflecting 7 to 9 months of additional learning, respectively (Steele et al., 2017). Additionally, Morales (2024) found that native English-speaking students in grades 1 through 4 who win access to a DLI program score higher in reading and math by 0.12 and 0.14 standard deviations, respectively, with achievement gains realized as early as first grade (Morales, 2024). Texas's experience demonstrates the potential power of formula-based incentives. Recent reports suggest that several school districts have responded to House Bill 3 by adding dual-language immersion programs to additional schools (Zabala, 2022).

Differentiate funding by English proficiency level. California currently provides the same funding weight regardless of a student's English proficiency level. A newcomer student at the beginning stages of English acquisition, who may require intensive support including specialized curriculum, additional staff time, and assessment accommodations, generates the same funding as a student approaching reclassification who may need only maintenance support. This one-size-fits-all approach fails to recognize the varying costs of serving students at different points in their language development. By contrast, Indiana's funding model provides MLE funding ranging from $384 to $550 per student depending on English proficiency level, with students demonstrating lower proficiency generating more funding (Indiana Department of Education [IDOE], 2024; Ind. Code § 20-43-10-4, 2023). Current funding systems often fail to account for the diverse needs of English learner students, which vary based on proficiency level, grade, recency of arrival, and prior educational disruptions (Villegas, 2023). Research on resource needs makes clear that a student entering an English language program requires fundamentally different and more intensive services than one building on existing English proficiency (Gandara & Rumberger, 2008). Further, any such differentiation must be accompanied by adequate overall funding levels to be effective, as Indiana's experience demonstrates.

Resource use reforms.

Strengthen accountability for MLE funding use. California's current system provides districts with significant flexibility in how they spend supplemental and concentration funds but offers limited accountability for whether these funds actually reach the MLEs and other high-need students they are intended to support. The state's financial system does not explicitly track the use of these additional funds, nor the students or school sites on which the funding is spent. Rather, districts must provide plans through Local Control and Accountability Plans (LCAPs) that document how they will use funds to increase or improve services for high-need students.

Research shows that this system has significant gaps. A 2019 report from the California State Auditor revealed significant accountability gaps in the state's school funding system. The audit's central finding was stark. California does not explicitly require districts to spend supplemental and concentration funds on intended student groups or to track how those funds are used (California State Auditor, 2019, p. 1). The requirement for districts to "increase or improve services" by a specific percentage was deemed "essentially meaningless" because districts had no way to demonstrate compliance (p. 23). Subsequent research confirmed these patterns statewide. The Public Policy Institute of California found that nearly 60% of districts in 2021-22 planned to spend less on high-need students than the supplemental funding they received for them (Lafortune et al., 2023). Even when districts used LCFF funds to increase staffing at high-need schools, the impact was muted because these schools tend to employ newer, lower-paid teachers (Bruno & Kim, 2024).

The California State Auditor's report (2019) recommended requiring districts to track supplemental and concentration spending, retain unspent funds for intended students in subsequent years, and provide clearer analyses of service effectiveness in their LCAPs (California State Auditor, 2019, pp. 2–3). Texas's Bilingual Education Allotment reflects this principle. Districts must spend at least 55% of allotment funds on direct program costs, with compliance monitored by TEA (Texas Education Agency, 2024, p. 3).

Invest in bilingual teacher pipeline and state-level infrastructure. California faces a severe bilingual teacher shortage that threatens to undermine any funding reforms. This shortage is a direct legacy of Proposition 227 (1998), which mandated English-only instruction and dismantled bilingual teacher training programs across the state. Before Prop 227, approximately 30% of MLEs were served

by bilingual programs; the implementation of Prop 227 would drop this percentage to 8% (Parrish et al., 2006). Though Proposition 58 repealed these restrictions in 2016, the teacher pipeline has not recovered. Only 1,011 new bilingual authorizations were issued statewide in 2022-23 across all languages, and only 7 Vietnamese authorizations despite Vietnamese being the second-most-common language among California MLEs (Mathewson, 2024). As a result, California enrolls only about 10% of its MLEs in bilingual programs, compared to nearly 40% in Texas (Williams, 2025; Mathewson, 2024). Schools serving proportionately more long-term MLEs are also significantly less likely to have enough qualified teachers (Price et al., 2024).

Conclusion

California's renewed commitment to bilingualism and multilingualism reflected in Proposition 58, the English Learner Roadmap, and Global California 2030 places new demands on the educator workforce and on state capacity to support high-quality bilingual education. Although local educational agencies now have expanded authority to offer dual language and other bilingual programs, the effectiveness of these programs depends on both the availability of appropriately prepared bilingual teachers and the presence of clear state guidance and monitoring. Teacher preparation pathways that lead to bilingual authorization must be matched with sustained state investment, technical assistance, and oversight to ensure program quality and equitable implementation. Without attention to both workforce development and system-level support, expansion of bilingual education risks uneven quality and access across districts and student populations.

Looking ahead, the recommendations suggest that California's next phase of MLE policy reform should focus less on articulating new instructional visions and more on strengthening the mechanisms that ensure access, coherence, and accountability. By adopting a more predictable approach to bilingual education access, establishing specialist requirements for teachers of record, and introducing formal assessment of evidence-based competencies, California can better align its preparation and instructional systems with the research base and support more equitable educational trajectories for multilingual learners over time.

Texas and Indiana also offer California important lessons about both MLE funding policy and resource use, though not as simple models to replicate. On funding policy, Texas demonstrates valuable

structural innovations, including formula-based incentives for dual language programs, additional funding for non-MLE students in two-way programs, and tiered weights based on program type. Indiana illustrates the principle of proficiency-differentiated funding, recognizing that students at different stages of language acquisition have different resource needs. However, both states also illustrate the critical importance of adequate funding levels.

On resource use, Texas provides models for both accountability (the 55% minimum spending requirement on direct costs) and infrastructure (the TxEDLIF framework and TXEL portal). Yet Texas also demonstrates that funding incentives cannot overcome chronic teacher shortages, with bilingual educators identified as a shortage field every year since 1990. Indiana's experience shows what happens when resource use accountability is not outlined in funding policy; for example, districts redirect targeted funds to cover shortfalls elsewhere, with 16% of complexity grant dollars statewide backfilling special education and MLE costs.

A challenge that cuts across all three states, and indeed across the nation, is the persistent shortage of qualified bilingual and ESL educators. Texas has identified bilingual educators as a shortage field every year since 1990 (Texas Association of School Boards, 2023). California's bilingual teacher pipeline was severely diminished by Proposition 227, and recovery has been slow, with only 1,011 new bilingual authorizations issued statewide in 2022-23 (Mathewson, 2024). Indiana faces analogous constraints as its MLE population has grown by more than 50% since 2017 (Smith, 2022). These workforce challenges underscore a fundamental limitation of funding policy reform. Even well-designed funding formulas and accountability structures cannot improve outcomes for English learners if there are not enough qualified teachers to deliver instruction. Any state-level reform effort must therefore pair funding and accountability measures with sustained investment in the bilingual educator pipeline.

California faces challenges in both dimensions. On funding policy, the state's unduplicated pupil counts, low supplemental weight, lack of program-differentiated incentives, and absence of proficiency-based funding leave districts without the resources or incentives to serve English learners effectively. On resource use, weak accountability for supplemental spending, a decimated bilingual teacher pipeline from Proposition 227's legacy, and non-binding policy guidance mean that even available funds may not translate into quality services. Only 10% of California's English learners are enrolled in bilingual programs compared to 40% in Texas, and only 10.3% of current EL students met or

exceeded standards on state English language arts assessments (California Department of Education, 2025).

No single reform will close California's MLE achievement gap. Funding policy reforms without resource use reforms may result in additional dollars that never reach classrooms. Resource use reforms without adequate funding policy will leave districts unable to hire qualified teachers or implement effective programs. But by attending to both dimensions and learning from both the successes and ongoing challenges of Texas and Indiana, California has an opportunity to strengthen its approach to supporting the 1.1 million English learners who represent the state's future.

Summary of Recommendations

- Institute formal, statewide verification of evidence-based MLE instructional competencies
- Integrating specialist expertise and shared responsibility across the teaching workforce.
- Allow dual funding for students who are both MLEs and low-income
- Increase the MLE funding weight
- Create formula-based incentives for dual language programs
- Differentiate funding by English proficiency level
- Strengthen accountability for MLE funding use

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