

June 16, 2025

Secretary Linda McMahon
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Written Comment RE: Priorities, Requirements, Definitions, and Selection Criteria: Evidence-Based Literacy, Education Choice, and Returning Education to the States ED-2025-OS-0020-0001

Submitted Electronically via Regulations.gov

Dear Secretary McMahon:

We submit this written public comment in response to the U.S. Department of Education's (the Department) proposal regarding priorities to include Evidence-Based Literacy, Education Choice, and Returning Education to the States (the Priorities) (Docket ID ED-2025-OS-0020-0001).

As an individual membership organization representing more than 10,000 language educators and administrators nationally and internationally, ACTFL is dedicated to the improvement and expansion of the teaching and learning of all languages at all levels of instruction. As such, we follow the pulse of language programs nationwide and can see in real time the numerous advantages such programs—when adequately supported—provide to their communities, our national economy, and to our children's future.

Given the wealth of research-based evidence that points to the cognitive and employability benefits of language education for all students,¹ **ACTFL strongly encourages that language education be included as an essential component of the Priorities—as a valuable tool in the promotion of literacy, a necessary option for students and families when planning academic pathways, and as a subject matter adequately supported at the federal level to ensure accountability.**

Proposed Priority 1: Promoting Evidence-Based Literacy

ACTFL agrees that federal education spending should prioritize “ensuring that every student in America becomes proficient in reading” and that we should be deeply concerned about promoting robust “educator pipelines at the postsecondary level” to develop highly trained,

¹ Fox, R., Corretjer, O., & Webb, K. (2019). Benefits of foreign language learning and bilingualism: An analysis of published empirical research 2012–2019. *Foreign Language Annals*, 52(4), 699-726. <https://doi.org/10.1111/flan.12424>

certified educators across subject matter. What is missing in the Priorities is the fact that combining the goal of literacy with concurrent language education will produce much stronger results than a focus on building literacy via English coursework alone.

Research shows—and has consistently demonstrated as far back as the 1970s—that laying strong foundation in language education for our youngest learners and sustaining that study throughout their K-20 experience is deeply beneficial in the [development of students' reading abilities](#), and produces higher scores [across academic subject areas](#) (including [higher SAT and ACT test scores](#), extending specifically to English scores²).

Data proves that bilingual children and those learning a target, home, or heritage language in addition to English:

- Score higher on **word-reading and spelling tasks** than monolingual skilled readers³;
- Perform better in **reading achievement** (vocabulary, comprehension, and total reading skills) when compared with students with no world language instruction⁴;
- Are better at **grammatical judgment, correction tasks, and word recognition**, developing strong **linguistic awareness**⁵;
- Have a better understanding of the **symbolic representation of print**⁶;
- See boosted **metalinguistic abilities, including morphological and phonological awareness** as early as kindergarten⁷; and
- Transfer **awareness of syntactic structures** from one language to another with a positive impact on reading comprehension⁸.

We advise the Department to consider combining a focus on literacy with the study of world languages to provide students with all the skills they require to produce the most efficient results in raising literacy rates.

² Olsen, S.A., Brown, L.K. (1992). The relation between high school study of foreign languages and ACT English and mathematics performance. *ADFL Bulletin*, 23(3), from ERIC database.

³ D'Angiulli, A., Siegel, L. S., & Serra, E. (2001). The development of reading in English and Italian in bilingual children. *Applied Psycholinguistics*, 22(4), 479-507. from PsycINFO database.

⁴ District of Columbia Public Schools, Washington, D.C. (1971). A study of the effect of Latin instruction on English reading skills of sixth grade students in the public schools of the district of Columbia, school year, 1970-71., 18. from ERIC database.

⁵ Demont, E. (2001). Contribution of early 2nd-language learning to the development of linguistic awareness and learning to read/Contribution de l'apprentissage précoce d'une deuxième langue au développement de la conscience linguistique et à l'apprentissage de la lecture. *International Journal of Psychology*, 36(4), 274-285. from PsycINFO database.

⁶ Bialystok, E. (1997). Effects of bilingualism and biliteracy on children's emerging concepts of print. *Developmental Psychology*, 33(3), 429-440. from PsycINFO database.

⁷ Eviatar, Z., Taha, H., & Schwartz, M. (2018). Metalinguistic awareness and literacy among semitic-bilingual learners: A cross-language perspective. *Reading and Writing: An Interdisciplinary Journal*, 31(8), 1869–1891. <https://doi.org/10.1007/s11145-018-9850-9>

⁸ Tong, X., Kwan, J. L. Y., Tong, S., & Deacon, S. H. (2022). How Chinese–English bilingual fourth graders draw on syntactic awareness in reading comprehension: Within-and cross-language effects. *Journal of Research in Reading*, 45(1), 78-94.

Proposed Priority 2: Expanding Education Choice

Access to a world-class education is a right of all U.S. students, and a world-class education includes the study of world languages at all levels of instruction—from our youngest children to the most advanced scholars.

ACTFL agrees that students and their families should be empowered to choose “an education that aligns with their unique needs and career goals,” and we insist that high-quality, proficiency-based language education taught by a certified language educator be among the choices available to every student. Proven outcomes of language education include enhanced workforce opportunities, increased competition in the jobs market for roles at all levels of education, and career benefits across sectors.

Findings by ACTFL and [New American Economy](#) indicate that language skills place multilingual job candidates at a distinct competitive advantage over their monolingual peers—whether these individuals enter the workforce immediately upon graduation or seek an advanced degree. [Our research shows](#) that the demand for multilingual talent across industries and functions is both urgent and rising, with 90 percent of U.S. employers stating reliance on employees with skills in languages other than English⁹.

Furthermore, we know that language learners develop improved skills in categories identified in the [Career and Technical Education \(CTE\) Employability Skills Framework](#), as established by the U.S. Department of Education—becoming advanced collaborators, analyzers, planners, thinkers, and communicators. For these reasons, companies in manufacturing, construction, the health sciences, hospitality and travel, trade, and other sectors are seeking multilingual talent *not only* for the language skills they can leverage in working with partners and clients who do not speak English, but also for the social skills and perspective that language learners bring to the table.

Supporting the Department’s focus on students’ ability to choose a pathway leading to earning an “industry-recognized credential prior to high school graduation” and access to “programs or coursework that lead to in-demand, industry-recognized credentials,” ACTFL suggests inclusion of the [Seal of Biliteracy](#)—a recognized credential now available to multilingual high school students in all 50 states—among the choices supporting pathways between K-20 education and career preparation.

Research on the impact of earning a Seal of Biliteracy indicates increased employability in sales and education, as well as greater confidence and interest in postsecondary education among Seal recipients post-graduation¹⁰. Based on assessment of a student’s proficiency in both English and another language, the Seal is recognized by institutions of higher education (often for college credit) and future employers.

⁹ ACTFL. *Making Languages Our Business*. (2019). <https://www.actfl.org/advocacy-and-public-education/making-languages-our-business>

¹⁰ Davin, K. J., Cruz, K. R., & Hancock, C. R. (2024). An examination of the postgraduation benefits of earning a Seal of Biliteracy. *Foreign Language Annals*, 57(3), 634-653. <https://doi.org/10.1111/flan.12753>

Proposed Priority 3: Returning Education to the States

As explained in detail in [our public statement dated March 12, 2025](#), following the grave reduction of U.S. Department of Education staff, ACTFL strongly opposes ongoing efforts to eliminate a federal agency that is vital to the success of our nation's youth.¹¹

We are compelled to reiterate that the Tenth Amendment to the U.S. Constitution establishes limited federal authority over education, so that by default states *already* direct many of our educational processes—including teacher certification, curricula, academic standards, and graduation requirements.

We ask that the U.S. Department of Education complete its responsibilities to U.S. students and their families, educators, administrators, and state-level colleagues in providing the necessary federal support which states depend upon to ensure consistent programming.

In removing this federal accountability, the proposed changes would place learners in less wealthy states at a dangerous disadvantage, with access to fewer resources and without leaders having the means of sustaining the same level of programming as their peers in states with greater networks of support.

A move away from all federal direction in education does not “empower” states; rather, it would detract from their already strained capacity to support learners and families to the best of their ability. Instead of providing such families with a greater excellence of choice in literacy, career-readiness, or language education—among other areas—elimination of the Department would actively prevent millions of children and families from accessing resources critical to their learning and well-being.

For the reasons mentioned above, we strongly encourage the Department to include language education as a means to accomplishing its proposed Priorities 1 & 2, and we condemn the proposed removal of federal support by means of a dedicated agency.

Should you have any questions regarding these comments, please contact Lawrence M. Paska, Ph.D., CAE, ACTFL Executive Director, at lpaska@actfl.org. Thank you.

¹¹ ACTFL. “ACTFL Statement Supporting the U.S. Department of Education.” (March 12, 2025). <https://www.actfl.org/news/actfl-statement-supporting-us-department-of-education>