



February 17, 2011

Secretary Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Comments on the U.S. Department of Education Interagency Working Group Action Plan on Asian Americans and Pacific Islanders

Dear Secretary Duncan:

Southeast Asia Resource Action Center (SEARAC) is a national organization that advances the interests of Cambodian, Laotian and Vietnamese Americans by empowering communities through advocacy, leadership development, and capacity building to create a socially just and equitable society. In the aftermath of the Vietnam War, over one million refugees escaping war and persecution in Cambodia, Laos and Vietnam were resettled in the U.S.¹ Today, nearly two million Southeast Asian Americans make their home throughout this nation.

The Asian American Legal Defense and Education Fund (AALDEF) is a national organization that protects and promotes the civil rights of Asian Americans. By combining litigation, advocacy, education, and organizing, AALDEF works with Asian American communities across the country to secure human rights for all.

Many Asian Americans, particularly Southeast Asian Americans, recent immigrants, and English Language Learner (ELL) students, face enormous struggles in our nation's public schools. While Asian American students are often overlooked due to the "model minority" myth, statistics show that Asian American students are struggling, failing, and dropping out of schools that ignore their needs. For example, nearly 25% of Asian American students are English Language Learners (ELLs) and Asian Americans as a whole constitute 12% of the ELL student population nationwide.² In addition, when compared to 85.3% of the overall U.S. population, disaggregated data reveals that only 61.5% of Cambodian, 61.7% of Hmong, 62.5% of Laotian, and 70% of Vietnamese Americans aged 25 and over hold a high school degree or higher.³

The following are recommendations from a collective of organizations representing many service sectors including direct service and health agencies, and community leaders serving Asian American communities.

We are encouraged by the U.S. Department of Education's plan to improve the quality of life of Asian Americans and Pacific Islanders (AAPIs) as specified by Executive Order 13515. We are especially pleased by the agency's plans to improve access and increase technical assistance and outreach to institutions that qualify for ED's AANAPISI program and other competitive grants, improve delivery of services to AAPI English language learners (ELLs), and increase recruitment of AAPI teachers.

¹ Max Niedzwiecki and TC Duong. 2004. *Southeast Asian American Statistical Profile*. Washington, DC: Southeast Asia Resource Action Center (2004): 10.

² Randolph Capps et al., *The New Demography of America's Schools: Immigration and the No Child Left Behind Act*, Urban Institute, 2005; 2000 U.S. Census.

³ U.S. American Community Survey. 2009.



RECOMMENDATIONS

SEARAC, AALDEF, and the undersigned organizations and individuals urge the U.S. Department of Education to consider further recommendations to its agency plan.

Inter-Agency Collaboration: We urge agencies to work collaboratively to address issues that are overlapping. For example, the Department of Education should work with the U.S. Census Bureau and the Department of Health and Human Services on disaggregating data by ethnicity; with the Department of Justice on anti-bullying; and with the Department of Labor on recruitment of AAPI teachers.

Agency Wide Infrastructure Building: We have seen the significant impact that community liaisons in federal agencies have had and on communities across the U.S. We urge each federal agency to ensure that there is staff designated to working with Asian American and Pacific Islander communities to better inform and engage them in federal resources and information. For example, the Department of Education currently has a number of directors of communications and outreach for many underserved communities except the AAPI community. In addition, the Department of Labor has a Special Assistant to the Secretary that focuses on reaching out to the AAPI community. Similar outreach staff that are senior level and have access to high level directors and secretaries have been key to effective engagement and outreach with AAPI communities.

While we believe that the current version of the plan is strong, we write to offer our recommendations to strengthen the U.S. Department of Education's Interagency Working Group Action Plan.

Goal 1: Data. We believe that identifying and highlighting models with potential for replication of how schools and colleges use disaggregated data systems for AAPI students is extremely important. However, since the need for disaggregation of data is central to addressing the diverse needs of AAPI students, there must be stronger support for State Education Agencies (SEAs) and Local Education Agencies (LEAs) to ensure that actions are taken to address the dire educational needs of AAPI students.

Recommended Changes to Objective 1.1:

- Under Objective 1.1, after "*identify*," add "**and make public.**"
- Under Objective 1.1, after "*identify three states or school districts that disaggregate data*," add "**by ethnicity.**"
- Under Objective 1.1, after "*with potential for replication*," add "**and identify which would be most appropriate for district by district and/or state by state comparisons.**"

Objective 1.1 should read:

Objective 1.1: Identify and make public three data systems that disaggregate data by ethnicity with potential for replication, and identify which would be most appropriate for district by district and/or state by state comparisons.

Recommended Changes to Objective 1.2:

- Under Objective 1.2, after, "*provide technical assistance*," add "**to states/districts that have been identified and.**"



- Under Objective 1.2, after “*significant AAPI populations regarding,*” add “**how to transition to one of these data system models.**”
- Under Objective 1.2, **eliminate** “*on a voluntary basis.*”
- Under Objective 1.2, **eliminate** “*potential data system models.*”
- **Replace** “*Objective 1.2*” with “**Objective 1.3.**”

Objective 1.2 should read:

Objective 1.3: Provide technical assistance to states/districts that have been identified and to states/districts with significant AAPI populations regarding how to transition to one of these data system models.

- After Objective 1.1 and before Objective 1.3, add “**Objective 1.2: Identify at least 3 states/districts with significant AAPI populations that should transition into a data system that disaggregates data by ethnicity.**”

Goal 2: AANAPISI. We believe improving access and increasing technical assistance and outreach to institutions that qualify for ED’s AANAPISI program and other competitive grants are essential to ensuring students who make it to post-secondary education are being well served. While funding is guaranteed through the Health Care and Education Reconciliation Act of 2010 for the next ten years and these proposed strategies are a step in the right direction, ED must take necessary action to guarantee that the program has the proper administrative support.

- Under Objective 2.1, after “*ten percent,*” add “**of the total number of institutions that have been identified by the Congressional Research Service as qualifying.**”
- Under Objectives, add “**Objective 2.3: Increase transparency of AANAPISI institutions’ activities.**”
- Under Goal 2, Strategy 1, after “*c. Conduct two conference calls or webinars re: ED competitive grants,*” add “**Conduct at least 3 on the ground outreach activities in states with significant number of AANAPISI-eligible institutions.**”
- Under Goal 2, Strategy 2, after “*a. Conduct legal research regarding eligibility, prepare a summary of ED programs for which AANAPISIs are eligible along with appropriate guidance, and communicate this information to the public,*” add “**b. Communicate information regarding benefits of the AANAPISI designation to AANAPISI-eligible institutions.**”
- Under Goal 2, Strategy 3, after “*c. WHIAAPI/ED representative will help build better relationships with the philanthropic sector to encourage support,*” add “**d. WHIAAPI/ED representative will help each agency develop a model on how to connect with AANAPISIs.**”
- Under Goal 2 after “*Strategy 4: Increase awareness of AANAPISIs within Federal agencies and philanthropic partners that may provide support to AANAPISIs,*” add “**Strategy 4: Increase transparency of AANAPISI institutions’ activities**” and under benchmarks, add “**Post AANAPISI institutions’ application, grant report, and budget online for public viewing.**”

Goal 3: Anti-Bullying. We believe that students cannot thrive in a learning environment that is not safe. Unfortunately, as seen in the past couple of years, AAPI students are constantly faced with bias-based harassment and violence that often goes unaddressed.

- Under Goal 3, Strategy 2, **replace** “*combat*” with “**address.**”
- Under Goal 3, Strategy 5, after “*Release a fact sheet with data,*” add “**disaggregated by ethnicity and English language learner status.**”



Goal 4: English Language Learners. We believe that all students, including English language learners (ELLs), should be held to high standards and should be provided with the support necessary to be successful. While nearly one out of four AAPI students is an ELL and lives in a linguistically isolated household where one or more parents have limited English proficiency,⁴ most school districts are not required to and therefore, do not provide, sufficient services for ELL students and their parents, especially in cases where students speak a language other than Spanish.

- Under Goal 4, after *“Strategy 4: Hold a series of summits in at least three locations around the country to engage with diverse communities, researchers and practitioners on ‘What makes a high-quality EL program in the 21st Century,’”* add ***“Strategy 5: Develop and utilize native language assessments in AAPI languages for AAPI ELL students.”***

We applaud the great work the White House Initiative on Asian Americans and Pacific Islanders and the U.S. Department of Education have been doing over the past couple of years to engage the AAPI community, and we look forward to working with you to ensure that the needs of all students are being met. We hope you will carefully consider our comments when drafting the final Interagency Working Group Action Plan for the U.S. Department of Education.

If you have any questions regarding these comments, please contact: **Monica Thammarath**, Education Policy Advocate, Southeast Asia Resource Action Center (SEARAC), email: monica@searac.org, phone: (202) 667-4690, or **Khin Mai Aung**, Director, Educational Equity and Youth Rights Project, Asian American Legal Defense and Education Fund (AALDEF), email: kaung@aaldef.org, phone: (212) 966-5932 ext. 219.

Sincerely,

National Organizations

Margaret Fung, Executive Director
Asian American Legal Defense and Education Fund (AALDEF)
New York, NY

Doua Thor, Executive Director
Southeast Asia Resource Action Center (SEARAC)
Washington, DC

Marita Etcubañez, Director of Programs
Asian American Justice Center
Washington, DC

Gregory Cendana, Executive Director
Asian Pacific American Labor Alliance, AFL-CIO
Washington, DC

Neil Horikoshi, Executive Director
Asian & Pacific Islander American Scholarship Fund
Washington, DC

⁴ Randolph Capps, et al. *The New Demography of America's Schools: Immigration and the No Child Left Behind Act*, Urban Institute (2005).



Floyd Mori, Executive Director
Japanese American Citizens League
Washington, DC

Amardeep Singh, Director of Programs
The Sikh Coalition
New York, NY

Local Organizations

Marge Leopold, Site Coordinator
The Bridge
Modesto, CA

Alberto Audifaz Gonzalez, Jr., Statewide Policy Advocate
California Immigrant Policy Center
Sacramento, CA

Sarong (Rorng) Sorn, Executive Director
Cambodian Association of Greater Philadelphia
Philadelphia, PA

Wayne Ho, Executive Director
Coalition for Asian American Children and Families
New York, NY

Candice Adam-Medefind, Executive Director
Health House Within a MATCH Coalition
Merced, CA

Theanvy Kuoch, Executive Director
Khmer Health Advocates, Inc.
West Hartford, CT

Bounchanh Senthavong, Board of Directors
Lao American Women Association, Washington Metro Area
Alexandria, VA

Houa Vang, Executive Director
Merced Lao Family, Inc.
Merced, CA

Debbie Almontaser, Board Chair
Muslim Consultative Network
New York, NY



Vilay Chaleunrath, Executive Director
Newcomer Community Service Center
Washington, DC

Anthony Layton, Associate Director
Providence Youth Student Movement
Providence, RI

Mai Ka Yang, Executive Director
Stone Soup Fresno
Fresno, CA

Minh Nguyen, Executive Director
Vietnamese American Young Leaders Association of New Orleans
New Orleans, LA