



An Overview of English Learner Reclassification Policy: Approaches and Planning Considerations for State Education Agencies

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This report presents an overview of current state-level reclassification approaches, describes the range of methods employed, highlights aspects of existing approaches, and offers implications and recommendations for improving policy and practice.



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Contents

WIDA Research	2
Introduction	4
Reclassification Approaches: A Review of State Practices	5
Automatic Reclassification Cut Score(s)	5
Automatic Reclassification Cut Score(s) With a Flexibility Range	6
Multiple Measures Including a Reclassification Cut Score	7
Summary of Reclassification Practices	7
Opportunities and Challenges of Perspectives for Reclassification Policymaking	8
Summary of Opportunities and Challenges	10
Implications for Reclassification Practices	10
Balance Standardization With Flexibility	11
Incorporate Multiple Measures of Proficiency, Including Qualitative Data	11
Adopt Growth Models That Recognize Incremental Progress	12
Prioritize Inclusion by Engaging Families and Communities and Ensuring Cultural and Linguistic Responsiveness	13
Professional Learning and Resources for Educators on the Complexities of EL Reclassification	14
Continuous Research and Evaluation to Monitor and Refine Reclassification Criteria and Examine Consequences	15
Implications for Future Policymaking	16
Factor 1: Educator Expertise	16
Factor 2: Instructional Programs	17
Factor 3: Statewide Interest-Holder Engagement	18
Factor 4: Family Partnership	19
Factor 5: State Administrative Codes and Statutes	20
Factor 6: Federal Law and Non-Regulatory Guidance	21
Factor 7: Academic and Linguistic Proficiency Benchmarks and Factor 8: Local Demographic Characteristics	23
Conclusion	24
References	25

Introduction

English learners¹ (ELs) represent a diverse and growing segment of the U.S. K–12 student population, representing approximately 10% of all students (National Center for Education Statistics [NCES], 2023). These students bring a wide range of linguistic, cultural, and socioeconomic backgrounds to their learning, underscoring the importance of well-designed policies that effectively support their English language development and educational success.

Historically, federal legislation has played a central role in shaping policies affecting ELs (Sato & Thompson, 2020). The Bilingual Education Act of 1968 marked a major federal commitment to supporting students with “limited English proficiency.” Later, the reauthorization of the 1965 Elementary and Secondary Education Act (ESEA) through the No Child Left Behind (NCLB) Act of 2001 placed a strong emphasis on accountability and standardized testing for ELs. Under NCLB, schools were required to assess the progress of ELs in demonstrating English language proficiency and meeting state academic standards. However, the approach often led to unintended consequences, such as schools focusing on test preparation rather than holistic language development (Baker et al., 2010; Neill, 2005; Sugarman, 2019). The Every Student Succeeds Act (ESSA) of 2015 sought to address some of these challenges by offering greater flexibility to states in how they measure and report the progress of ELs in demonstrating English language proficiency. It also introduced requirements for states to have their statewide EL reclassification policies reviewed and approved by the U.S. Department of Education.

A key aspect of EL policy under ESSA is reclassification—the process by which students are determined to have reached a sufficient level of English language proficiency to exit specialized EL services and fully transition into instructional settings without additional language support. Reclassification is a critical milestone for ELs because it can have long-term implications for their academic trajectories, access to rigorous coursework, and overall educational opportunities (Umansky, 2016; Uysal, 2024). However, reclassification policies vary widely across states in terms of the criteria used, including standardized English language proficiency (ELP) assessments, academic achievement measures, teacher evaluations, and parental input. These variations reflect a broader challenge of balancing the need for consistency and rigor with the importance of addressing the individual needs of students. In some cases, the lack of uniform standards can create disparities in outcomes for students identified as ELs across states and districts (Cimpian et al., 2017).

This report presents an overview of current² state-level reclassification approaches, describes the range of methods employed, highlights aspects of existing approaches, and offers implications and recommendations for improving policy and practice. By exploring the various ways states handle reclassification, the authors aim to illuminate how current policies can either support or hinder the educational success of ELs, while offering insights for future policy innovations that more effectively serve this vital student population.

1 In this paper, the term *English learner* (EL) is used for consistency with policy and assessment contexts. Its use is not intended to exclude or diminish the broader population of multilingual learners, whose diverse linguistic repertoires and strengths are equally recognized.

2 “Current” refers to information publicly available as of calendar year 2024.

Reclassification Approaches: A Review of State Practices

The U.S. Department of Education requires state education agencies (SEAs) to determine “standardized statewide” reclassification criteria and submit these criteria in their ESSA *state plan under section 3113(b) (2) of ESSA*. In doing so, SEAs must follow a state-specific process for policymaking to identify and approve reclassification criteria.

Reclassification policies vary substantially across states, reflecting diverse educational contexts and priorities. A review of state practices reveals reclassification based on combinations of standardized assessments, teacher evaluations, and student performance indicators (Rafa et al., 2020). In 24 states, reclassification is based on a single test-based criterion; however, the number, kind, and minimum cutoffs associated with test-based reclassification benchmarks vary across states (Morales & Lepper, 2024). Within this context, there is a spectrum of specific models and approaches for setting statewide reclassification criteria.

Automatic Reclassification Cut Score(s)

Some states have an automatic exit score on their ELP test. This approach ensures consistency in the reclassification process across schools and districts. The score(s) from an annual ELP exam alone determine(s) a student’s status as an EL.

- **Statewide ELP Composite Exit Score Criteria:** States that utilize this model for reclassification require ELs to score at or above a single overall ELP composite score. The threshold for ELP reclassification is based on composite scores, which are weighted averages of ELs’ individual Listening, Speaking, Reading, and Writing domain scores. A student’s overall composite score corresponds to a proficiency level (PL) and a composite scale score in the tested grade, and it serves as the single factor that determines reclassification.

Example: Delaware has a single composite exit score criterion of an overall composite PL of 4.7 or greater for the K–12 WIDA ACCESS™ (ACCESS) assessment refer to Delaware Department of Education, 2024, for more information.³

- **Statewide ELP Composite and Sub-Score(s) Criteria:** States that utilize this model for reclassification require ELs to score above a specified composite PL cut score and one or more sub-score cut(s). Sub-score cuts can include other composite scores like literacy (a Reading and Writing composite) or individual domain scores. The composite and sub-score cut(s) are the factors used to determine reclassification.

Example: Massachusetts has exit score criteria of a composite PL of 4.2 or greater for the overall composite and a literacy composite sub-score of 3.9 or greater on ACCESS (refer to Massachusetts Department of Elementary and Secondary Education, 2017, for more information).

3 The exit scores shown do not apply to alternate English language proficiency assessments.

- **Statewide ELP Conjunctive Scores Criteria:** States that utilize this model for reclassification require ELs to score above a specific cut score in each of the four domains: Listening, Speaking, Reading, and Writing. The domain cut scores are the factors used to determine reclassification.

Example: Ohio has a conjunctive exit score of 4 or 5 in each of the four domains of the Ohio English Language Proficiency Assessment: Listening, Reading, Speaking, and Writing (refer to Ohio Department of Education and Workforce, 2025, for more information).

Automatic Reclassification Cut Score(s) With a Flexibility Range

Some states utilize a flexibility range around an established exit score. Within this flexibility range, multiple potential reclassification cut scores may be applied at the student or local education agency (LEA) level. The specific cut score used for reclassification is determined by additional factors beyond students' performance on the ELP assessment.

- **Statewide ELP Flexibility Range:** States that utilize this reclassification model have standardized, statewide criteria that allow for a range of PL scores for reclassification based on student-level factors. Within the flexibility range, LEAs are required to use other statewide standardized data—such as statewide content tests, student inventories, rubrics, and interim assessments—to determine eligibility for reclassification within the flexibility range.

Example: Pennsylvania requires both ACCESS and standardized language use inventories for reclassification. Educators leverage a points system based on ACCESS and the language use inventory to produce a single score. If that score exceeds the state-defined threshold, then the student is eligible to be reclassified. The minimum ACCESS overall composite PL for the reclassification range is 4.5. Once students score at or above a 4.5, the reclassification cut score at which ELs are eligible for reclassification is based on the number of points they score on the standardized language use inventories (refer to Pennsylvania Department of Education, 2025, for more information).

- **Statewide Automatic Reclassification Cut Score(s) and LEA Choice Within the Flexibility Range:** States that utilize this reclassification model have a statewide automatic exit and a defined flexibility range within which LEAs choose and report their reclassification criteria to the SEA. LEAs can choose to adopt the use of only the automatic exit score as a single measure, or they can choose any lower PL within the flexibility range. They may also be able to evaluate students for reclassification using other statewide standardized data, such as student inventories, rubrics, and assessments.

Example: In Georgia, in grades 1–12, all ELs are eligible for reclassification when they score an overall composite PL of 5.0 or greater. This is called a “clear exit.” In addition to the “clear exit,” LEAs may establish other written procedures and submit them to the state. These procedures allow reclassification for students with composite PLs in the range of 4.3–4.9. An LEA may leverage other measures in its standardized exit procedures that are “valid, reliable, objective and applied and weighted consistently across the LEA” (refer to Georgia Department of Education, 2025, for more information).

Multiple Measures Including a Reclassification Cut Score

- **Statewide Multiple Measures:** States that utilize this reclassification model expect districts to apply uniform, statewide evaluation criteria to determine whether a student is ready for reclassification once they score at or above a statewide reclassification cut score. Those measures can include standardized data such as statewide content tests, student inventories, rubrics, and assessments.

Example: New Jersey has a reclassification cut score of a 4.5 composite PL or higher on ACCESS or WIDA MODEL™ (MODEL). To be reclassified, students who are multilingual learners⁴ must also demonstrate readiness based on educator evaluation through an English language observation form (refer to New Jersey Department of Education, 2025, for more information).

- **LEA-Determined Multiple Measure:** States that utilize this reclassification model expect LEAs to develop local evaluation criteria to determine whether a student is ready for reclassification once they score at or above a statewide reclassification cut score.

Example: California has four statewide reclassification criteria within which LEAs can set locally established reclassification policies and procedures. Students must score at PL 4 or above on the Summative English Language Proficiency Assessments for California. LEAs need to also define how to document and measure teacher evaluation, parent opinion and consultation, and the comparison of basic skills between the student being evaluated for reclassification and English-proficient students (refer to California Department of Education, 2025, for more information).

Summary of Reclassification Practices

As elucidated in this review of reclassification policies, SEAs set reclassification through one of the following three reclassification approaches: **(1) Automatic reclassification cut score(s) as a sole criterion for reclassification**, which provides LEAs with a simple reclassification process; **(2) Automatic reclassification cut score(s) with a flexibility range**, which can be more complex but also gives LEAs more autonomy to adjust reclassification cut score expectations based on local and/or student-specific considerations; **(3) Multiple measures including a reclassification cut score**, which set a standardized reclassification cut score on an ELP assessment and then allow LEAs to evaluate other measures of student performance as a part of the reclassification decision-making process.

Consistent with federally mandated guidelines under ESSA, which emphasize standardized criteria for determining English proficiency, states require students to demonstrate a minimum score on an ELP assessment as a key metric for reclassification. States that allow a flexibility range or multiple measures may also include supplementary criteria; however, there is a trend toward reduction of criteria (Morales & Lepper, 2024). While this trend may streamline administrative processes and support consistency of decisions based on a standardized criterion, issues remain related to adequately capturing the nuanced progress of ELs. The following section discusses some limitations and challenges to current approaches.

⁴ New Jersey, like many other states, uses the term multilingual learner in their state policy instead of the federal term *English learner*.

Opportunities and Challenges of Perspectives for Reclassification Policymaking

SEAs determine their state’s reclassification practices based on the underlying perspectives of SEA staff members and the other interest holders involved in EL policymaking. These perspectives impact reclassification policy decisions promulgated by SEAs (Bond, 2020a; Bond, 2020b; Flores & Lewis, 2023; Kangas, 2024). Policymakers should be mindful of the assumptions underlying their perspectives so that they can monitor the development of reclassification policy decisions with knowledge of the opportunities and challenges of their perspectives. Areas of opportunity and challenge include establishing policymaking legitimacy, fluid and compartment viewpoints, and policymaking for ELs with disabilities.

Underlying SEAs’ approaches to reclassification are tensions inherent with public policymaking. When creating any statewide policy, in this case for ELs, SEAs need to establish legitimacy with a variety of interest holders. Many SEA staff consider how their reclassification criteria impact interest holders based on implications for state funding, federal funding, and school accountability. SEA staff also need to negotiate the ideologies of statewide EL advisory committees, family groups, educators, and other interest holders (Bond, 2020b). As SEA staff negotiate the process to establish reclassification criteria, they must co-construct criteria that are deemed legitimate by interest holders. For SEAs to establish legitimacy, interested parties must view the rules as fair-minded and valid. In a democratic setting, quantification and standardization have been utilized to justify legitimacy. Porter (1996, pp. 7–8) explains this tension between quantification and informed intuition:

Ideally, expertise should be mechanized and objectified. It should be grounded in specific techniques sanctioned by a body of specialists. Then mere judgment, with all its gaps and idiosyncrasies, seems almost to disappear. . . . This ideal of mechanical objectivity, knowledge based completely on explicit rules, is never fully attainable. Even with regard to purely scientific matters, the importance of tacit knowledge is now widely recognized. In efforts to solve problems posed from outside the scientific community, informed intuition is all the more crucial. The public rhetoric of scientific expertise, however, studiously ignores this aspect of science. Objectivity derives not mainly from the wisdom acquired through a long career, but from the application of sanctioned methods, or perhaps the mythical, unitary “scientific method,” to presumably neutral facts.

SEA staff making reclassification decisions are members of bureaucracies with a federal mandate for statewide standardization and a need to justify reclassification rules to interest holders. As Porter (1996) states, there is a pressure to create policies (including reclassification policies) that are “mechanized and objectified” to remove the perception of bias in local decisions made about individual students. Mahoney and MacSwan (2005) and Kangas⁵ (2024) write against a “mechanized and objectified” measure and for a team-based approach that integrates a range of evidence, including interest-holder voices. They state that a high-impact decision like reclassification should not be made on standardized test scores alone. Therefore, there is a tension between leveraging the qualitative expertise and judgment of local educators with “objective,” quantitative cut scores on an ELP assessment.

5 Kangas (2024) promotes a team-based approach specifically in the context of reclassification for students with disabilities.

Another facet of this tension in reclassification policymaking is the ideological underpinnings of the fluid and compartment viewpoints of reclassification (Bond, 2020b). These viewpoints reflect the range of opinions on how flexible or rigid reclassification criteria should be. SEA staff who espouse the compartment viewpoint believe that EL categorization should be a strict, systemwide binary that is clearly determined, usually by a proficient cut score and/or proficient domain scores on an ELP assessment. Students who are close to the reclassification cut score are either fully in a language instruction educational program (LIEP) if they are ELs or fully out of an LIEP if they are reclassified (Klayton, 2023). While they can be monitored for reentry once they exit, there is a clear delineation between those who fall in and out of EL status and no room for flexibility in the decision-making process. This viewpoint clearly delineates which students are ELs (and therefore are afforded civil rights protections) and makes it easy to monitor whether LEAs are providing adequate support to meet students' civil rights. On the other side of this ideological tension is the fluid viewpoint of reclassification. SEAs who take this perspective may also advocate that support for language development should be provided regardless of EL status and based on ongoing assessment of students' language development, not binary, once-per-year standardized ELP assessment (Bond, 2020b). A more fluid viewpoint of reclassification produces a more holistic view of reclassification that "enacts visions of differentiated support that benefit all bilingual students without the need to identify their supposed linguistic limitations to justify this support" (Flores & Lewis, 2023, p. 10). Many SEA policies lie on a spectrum. SEA staff members implement policies that leverage aspects of the compartment and fluid viewpoints to navigate and contest the implementation and ideological policy spaces within their contexts (Bond, 2020a).

An additional limitation of the reclassification approaches summarized in this manuscript is how students with disabilities are included in reclassification criteria. As many EL students with disabilities cannot take all domains on an ELP or alternate ELP assessment, many states have fewer-than-four-domain policies that may modify their reclassification approach. These policies are set in place for students who LEAs identify as having a disability that prevents them from taking assessments in a specific ELP domain or domains based on their 504 plan and/or Individualized Education Program (IEP) (Kangas, 2024). In the WIDA Consortium, approximately 2% of those with 504 plans and/or IEPs had a missing domain (Porter et al., 2019). In these cases, a composite PL cannot be calculated unless an LEA identifies a student as needing an exemption from the impacted domain(s) and the state allows for a fewer-than-four-domain reclassification process (Kangas, 2024). There are challenges with this approach—it depends on whether SEAs support these procedures, whether LEA determinations to exempt students from the particular domain(s) are valid, and how well one, two, or three domain scores can substitute for four domains. For students with disabilities who can take assessments in all four domains, reclassification challenges may still exist. Recent research has demonstrated that ELs with IEPs report substantially lower scores on ACCESS (Sahakyan, 2024) and the intersectional experiences of students who are classified as both an EL and a student with disabilities have an impact on students' reclassification rates. For example, in their research in a WIDA state, Sahakyan and Poole (2023) found that students who have an IEP are more likely to be kept in EL status after 5 years (often defined in the literature as "long-term EL" identification) than students who do not have an IEP: "ELs with IEPs do report much higher rates of long-term identification compared to ELs who do not report ever having an IEP (73% vs. 39%)" (p. 86). Except for students with the most significant cognitive disabilities, most SEAs offered limited options to LEAs for tailoring reclassification approaches for students with disabilities (Burho et al., 2024; Kangas, 2024). In contexts

where such resources were not available, qualitative research suggests that teachers often relied on their professional judgment and values, rather than systematic data, when making reclassification decisions for these students (Kangas & Ruiz, 2025). Another area of score differentiation that was not included in the reclassification review is for students with the most significant cognitive disabilities. As of 2024, 36 states had published reclassification criteria for their alternate ELP assessment (Kangas, 2024), which is taken by students with the most significant disabilities. The authors did not include those criteria since not all states have adopted criteria, and some changes have occurred for alternate ELP assessments. Most SEAs are a part of the WIDA Consortium, which changed its scoring for the 2023–2024 WIDA Alternate ACCESS™ assessment. Many states have yet to adjust their reclassification criteria to reflect the new PLs. As a result, information included for the alternate ELP cut scores and reclassification approaches would not reflect the most up-to-date information.

Summary of Opportunities and Challenges

Reclassification policies continue to face significant challenges due to inherent tensions in public policymaking. To establish legitimacy, SEAs must develop reclassification criteria that interest holders perceive as fair and valid. While quantification and standardization typically can enhance legitimacy by providing clear and consistent benchmarks, such approaches overlook the value of professional judgment and context-specific knowledge, which can be essential for understanding the complexities of individual student progress (Porter, 1996). Additionally, differing perspectives and priorities vis-à-vis reclassification among interest holders can complicate the development of policies that effectively balance standardization with flexibility. Thus, the tension between the need for objective, standardized criteria and the importance of considering contextual, nuanced information continues to be a significant challenge in establishing fair and effective reclassification practices. This challenge underscores the opportunity for reclassification policies that balance standardization with flexibility and also prioritize accessibility, fairness, and inclusivity, providing a foundation for practical policy implications.

Implications for Reclassification Practices

Reclassification policies are pivotal in shaping ELs' educational trajectories and determining access to supports and opportunities within education systems (Cimpian et al., 2017; Umansky, 2016). A challenge for SEAs is to design policies that balance consistency with responsiveness, ensuring comparability across districts while allowing for local expertise and contextual responsiveness to address the diverse needs of students. In addition, SEAs can use key approaches to promote educational access and consistency in reclassification practices, including the incorporation of multiple measures, the adoption of growth models that account for incremental progress, intentional family and community engagement, targeted professional learning, and continuous policy monitoring and refinement. Collectively, these approaches can help SEAs foster more fair and educationally sound pathways for EL success. It is important to acknowledge that many of these approaches, especially those involving multiple measures, family engagement, or growth modeling, require greater resources, staffing, and professional learning investments than a single test-based exit score. These costs and capacity demands shape what is feasible for SEAs and LEAs, even when more nuanced approaches may be educationally sound.

Balance Standardization With Flexibility

When developing reclassification criteria, SEAs should determine the appropriate balance between state oversight and local discretion. Standardization, such as the use of a specified composite cut score, provides LEAs with transparency and comparability but can oversimplify complex patterns of language development. Conversely, granting LEAs too much discretion may introduce variation or bias (Estrada & Wang, 2018; Umansky et al., 2020).

Through standardization, SEAs can reduce variation in reclassification policy implementation. When making space for flexibility within a standardized framework, SEAs should consider how to incorporate multiple measures. Reliance on an automatic reclassification cut score alone, a method used in at least 24 states, is limited because it treats language proficiency as binary and does not consider the multidimensional and nonlinear nature of language acquisition (Morales & Lepper, 2024; Rafa et al., 2020). Due to variation in implementation, however, multiple measures can lead to uneven reclassification outcomes within states and LEAs, keeping students in EL status longer than necessary, or exiting them earlier than appropriate (Estrada & Wang, 2018; Mavrogordato & White, 2017; Thompson, 2015). Thompson (2015) found that complexity added by LEAs can cause students to continue EL services for reasons other than English language proficiency based on issues like procedural errors and reclassification measures like math content performance. In addition, assumptions about racial groups may impact how LEAs approach the reclassification process and create barriers that affect how students are considered for and processed through reclassification (Umansky et al., 2020).

A promising approach is to establish statewide minimum thresholds (e.g., composite or domain cut scores) paired with carefully defined flexibility ranges or supplementary measures. This approach allows for local expertise about students to inform decisions without undermining comparability (Bond, 2020b; Flores & Lewis, 2023). Nonetheless, the feasibility of such approaches depends on SEA capacity and funding to design tools, train educators, and monitor implementation.

Incorporate Multiple Measures of Proficiency, Including Qualitative Data

While a single measure for proficiency is mechanized and simple for LEAs to apply in their local context, it does not account for the depth and breadth of qualitative data available to LEA staff (Morales & Lepper, 2024; Neill, 2005). Leveraging their professional insights and judgment, LEAs can develop a more complete and balanced understanding of students' assets and skills. Multiple measures can include sources such as a "teacher rubric or objective portfolio . . . as long as the local input is applied and weighted consistently across the State" (U.S. Department of Education, 2019, p. 49). SEAs could provide standardized tools (e.g., observation forms or portfolios with scoring guidance) so that statewide ELP tests are not the sole determinant of reclassification eligibility (Neill, 2005). Once such tools are established, states must determine how to meaningfully integrate local input alongside standardized test scores. ESSA (2015, §3113(b)(2)) requires that reclassification criteria be statewide, standardized, and approved in state plans (U.S. Department of Education, 2019).

One option to ensure a system that both safeguards students' civil rights and values local professional judgment is for SEAs to consider setting a relatively high "automatic exit score." At or above this score, students could be reclassified without the need for additional qualitative data. For students scoring below this threshold, standardized tools for incorporating local input could provide an additional pathway, allowing professional insights and evidence from multiple sources to complement test performance in reclassification decisions. Quantitative data from other measures of ELP, such as an interim assessment or state-designated assessment, could also be used.⁶ However, as noted previously, these practices require SEAs and LEAs to ensure staffing capacity and invest in appropriate professional development and monitoring.

Adopt Growth Models That Recognize Incremental Progress

Second language acquisition is not linear. Students often make rapid gains at lower PLs and slower gains as proficiency increases (Cook et al., 2012; Hopkins et al., 2024). Traditional reclassification policies, however, rely on fixed benchmarks and growth-to-target (GTT) models that typically assume linear progress. These approaches can result in students being exited prematurely or kept in EL status longer than necessary, limiting access to rigorous coursework and contributing to a "long-term EL" designation (Hopkins et al., 2024; Kim & Herman, 2012; Umansky, 2016; Villegas & Pompa, 2020).

Research suggests that GTT and other more linear frameworks impose rigid expectations that oversimplify the inherently nonlinear nature of language development. ELs at lower PLs tend to make more rapid gains in their language development than ELs at higher PLs, who tend to make slower progress (Cook et al., 2012). Growth rates also vary by age, grade level, prior schooling, literacy experiences, and other contextual factors. Applying fixed, linear expectations could risk misclassifying students by promoting premature exit for those with rapid initial gains and prolonged classification for those whose progress naturally slows at more advanced stages of development, for example, resulting in inaccurate conclusions about both student learning and program effectiveness (Hopkins et al., 2024). Student growth percentiles (SGPs) and value-added models (VAMs) typically offer more nuance by accounting for relative progress as well as the deceleration of growth at higher levels (Hopkins et al., 2024). For example, SGP models recognize that students at advanced levels typically show slower gains than students at lower levels, providing a fairer assessment of incremental progress. When incorporated into reclassification policies, these models can reduce unfairness, decrease the number of students in "long-term EL" status, and better align policy with research on language acquisition (Villegas & Pompa, 2020). These models, however, can be resource-intensive, requiring robust data systems, analytic expertise, and deliberate communication strategies to ensure transparency and understanding by educators, policymakers, and families. Without adequate capacity and funding, SEAs may struggle to implement such models effectively.

⁶ Federal guidance has inferred that SEAs should not include the results of content assessments because "English language proficiency and State academic content standards are distinct concepts" (U.S. Department of Education, 2019, p. 49). However, state requirements may necessitate the use of content assessments for reclassification (Texas Administrative Code Title 19 § 89.1226).

Beyond reclassification, adopting growth-based approaches has broader implications for accountability and fairness. SEAs can expand their systems to integrate multiple indicators of EL success beyond proficiency thresholds, such as sustained academic performance post-reclassification (Kim & Herman, 2012). By shifting toward growth-based approaches, states can also mitigate disparities in reclassification across districts by reducing the influence of subjective judgments and inconsistent exit criteria (Villegas & Pompa, 2020). Incorporating models that recognize incremental growth can help SEAs balance standardization with flexibility, ensuring reclassification policies are rigorous, fair, and contextually responsive.

Prioritize Inclusion by Engaging Families and Communities and Ensuring Cultural and Linguistic Responsiveness

Research underscores that meaningful family engagement in educational decision-making contributes to improved student outcomes, particularly for ELs (Hughes et al., 2016). However, current reclassification practices often fail to account for the unique linguistic, cultural, and familial contexts of ELs, leading to policies that may unintentionally disadvantage certain student populations. By fostering reciprocal communication with families, educational institutions can ensure that reclassification decisions reflect a more holistic understanding of students' language development, academic readiness, and socioemotional well-being (Burho & Thompson, 2021). For example, schools that incorporate parent/family and community consultations into reclassification decisions provide families with the opportunity to contribute valuable insights regarding their children's language use, learning experiences, and educational goals, thereby ensuring a more culturally and linguistically sustaining approach to policy implementation (Barrueco et al., 2016).

Furthermore, culturally and linguistically responsive engagement strategies can mitigate barriers that prevent families from participating in reclassification decisions. Many linguistically diverse families experience difficulties navigating educational systems due to language barriers, insufficient familiarity with U.S. school policies, and/or historical exclusion from school decision-making processes (Duran et al., 2010). Research suggests that schools that actively employ strategies such as bilingual family liaisons, translated materials, and multilingual advisory councils see increased parental involvement, which in turn fosters trust and shared responsibility in student success (Hughes et al., 2016). Schools that incorporate culturally relevant pedagogy in their outreach (e.g., using culturally familiar narratives and community storytelling) can bridge communication gaps and make policies like reclassification criteria more transparent to families (Goodman & Hooks, 2016). Ensuring that parents/families understand not only the technical criteria for reclassification but also the long-term academic implications of exiting EL services supports families in making informed decisions that align with their children's linguistic and educational trajectories.

Reclassification policies that prioritize inclusivity through family engagement can support more fair educational outcomes for ELs. Schools that integrate families as active interest holders in reclassification decisions move beyond a one-size-fits-all approach and instead develop policies that recognize the complexity of language development and the diverse needs of ELs (Burho & Thompson, 2021). Policymakers should consider embedding parent/family and community perspectives into state- and district-level policy frameworks to ensure that reclassification systems do not disproportionately

disadvantage ELs from particular linguistic or socioeconomic backgrounds. By intentionally promoting school–community partnerships and ensuring culturally and linguistically responsive outreach efforts, states and districts can work toward a more culturally and linguistically sustaining approach to EL reclassification. Embedding structured family input into reclassification decisions ensures policies reflect students’ lived experiences and educational goals (Burho & Thompson, 2021). However, this requires investments in translation, communication and outreach, and staffing, which may pose challenges for under-resourced SEAs and LEAs. Capacity and funding, therefore, affect the extent to which family engagement can be operationalized beyond minimal consultation.

Professional Learning and Resources for Educators on the Complexities of EL Reclassification

How reclassification policy is interpreted by LEA staff is “dependent upon individuals’ understanding of the words within their own personal context, as well as their social and professional contexts” (White & Mavrogordato, 2019, p. 563). Educators apply policy based on personal interpretation and the norms that exist around them. This can lead to wide variations in implementation between individual educators and between LEAs (Estrada & Wang, 2018; Mavrogordato & White, 2017). Any deviation from a binary, automatic reclassification cut score requires SEAs to give local educators discretion of the reclassification decision process. Even when SEAs have automatic reclassification cut scores, local educators can still deviate from SEA guidance and reclassify students below the automatic cut score or keep students in EL status who score above the automatic cut score (Bond, 2020b; White & Mavrogordato, 2019). To ensure educators informing reclassification decisions are adequately equipped to do so, they should be trained to implement SEA recommendations.

Some SEAs are hesitant to allow local expertise to be exercised in reclassification because they do not view LEA staff as sufficiently equipped to evaluate the ELP of students for reclassification (Bond, 2020a). SEAs should take a comprehensive approach to professional learning and resources for reclassification. Resources should be developed with clear, plain language guidelines for what the evaluation of student English language proficiency for reclassification must look like. Exemplars, on-demand training videos/courses, and toolkits can all be used to translate reclassification policy into practice. SEAs can utilize partnerships with their regional roundtables, state professional organizations, and/or county offices to conduct training of EL educators. To ensure LEAs understand the importance of appropriate reclassification practices, part of that training can include the types of documentation and evidence necessary for LEAs to comply with state-level or ESSA monitoring. Preservice educator training can also increase the appropriate application of reclassification criteria. SEAs should engage institutes of higher education (IHEs) with EL-focused teacher and administrator preparation programs through summits, regular meetings, or other venues, and they can provide standardized reclassification policy resources during these interactions. SEAs may even want to consider a train-the-trainer model for IHE faculty so that they are equipped to pass along reclassification policy information to their students. Again, feasibility depends on SEA funding and staffing capacity, which affect the extent to which SEAs can develop and disseminate resources at scale and support local implementation.

Continuous Research and Evaluation to Monitor and Refine Reclassification Criteria and Examine Consequences

Despite research findings showing reclassification significantly impacting EL students' academic trajectories, there remains considerable variability in how districts and states implement and assess reclassification policies (Cimpian et al., 2017). Without appropriate monitoring and evaluation, standardized criteria may inadvertently create barriers for certain student populations, particularly those from historically minoritized linguistic backgrounds. Research leveraging regression discontinuity designs (RDDs) has revealed that while reclassification may improve academic outcomes for some ELs, it also can result in unintended consequences, such as reduced access to linguistic supports or shifts in instructional placement that disrupt students' learning progress (Chin, n.d.). These findings underscore the need for iterative policy evaluation that assesses student progress post-reclassification and examines the broader systemic effects of policy implementation.

A key challenge in evaluating reclassification policies is accounting for both intended and unintended consequences, particularly in relation to educational fairness. For instance, research suggests that reclassification policies structured around rigid proficiency benchmarks may disproportionately disadvantage students who demonstrate strong academic performance but still require targeted language support (Lee & Soland, 2022). Additionally, state-level standardization efforts suggest that shifts in policy design can significantly alter reclassification rates and reduce linguistic bias in decision-making (e.g., a shift from district-led to state-led reclassification) (Bartlett et al., 2024). However, such shifts must be continuously examined to ensure they do not inadvertently create new disparities or overlook the nuanced needs of ELs who benefit from extended linguistic support. Policymakers should employ mixed-methods research approaches (i.e., the integration of quantitative analyses with qualitative insights) and involve a range of interest holders (educators, students, families) to assess how reclassification policies affect ELs' long-term academic success, socioemotional development, and access to coursework (Cimpian et al., 2017; Thompson, 2015; Umansky, 2016; Villegas & Pompa, 2020).

To promote fair and effective reclassification practices, SEAs should establish mechanisms for ongoing policy refinement informed by empirical evidence. Longitudinal studies tracking ELs' academic performance before and after reclassification can provide insights into whether current thresholds were appropriately set or require adjustment to reflect the diverse trajectories of language acquisition (Cimpian et al., 2017). Additionally, periodic policy reviews that include interest-holder engagement can help ensure that reclassification criteria remain both rigorous and responsive to ELs' educational needs. As states continue to refine their accountability frameworks, embedding continuous evaluation into policy design will be essential to balancing standardization with flexibility, fostering full access to educational outcomes, and mitigating unintended consequences. Such evaluation systems require technical expertise, staff capacity, and funding to ensure consistent implementation.

Implications for Future Policymaking

When establishing reclassification policy, SEAs need to consider a wide range of contextual factors that can inform the development of statewide reclassification policy. For each of the following factors, there are policy considerations and policymaking implications. These dot points can be used as checklists to investigate and weigh when creating, navigating, or contesting reclassification policies. Policymaking considerations are lists of environmental features that currently exist. The considerations for each feature can be used to categorically describe the reclassification landscape in a state. Policymaking implications are the areas of impact that a change in reclassification policy could create. These lists can help SEA staff members account for the potential opportunities and challenges of reclassification policy implementation.

Factor 1: Educator Expertise

Policymaking Considerations

Consider the expertise acquired through the following:

- District position(s) making reclassification decisions
- Preservice certification requirements and required in-service training related to reclassification
- SEA-level guidance documents
- SEA-required reclassification documentation and data entry

Policymaking Implications

SEAs need to account for the implications of educator expertise by

- Determining if specific district position types (e.g., EL specialist and content teacher) or certification types (e.g., ESL or bilingual certificate) need required involvement in the reclassification process
- Calibrating the complexity of multiple measures to match the expertise of teachers
- Creating and disseminating training and resources for in-service and preservice teachers
- Building on current documentation monitoring and data entry practices to ensure LEAs are meeting reclassification expectations

(See Bond, 2020b; Estrada & Wang, 2018; Kangas, 2024; Mavrogordato & White, 2017; and White & Mavrogordato, 2019.)

Factor 2: Instructional Programs

Policymaking Considerations

Consider the instructional program environment:

- LIEP models in the state and their implementation
- Characteristics of instructional environments for ELs with LIEP parent refusal
- Response to intervention (RTI)/tiered system of support (TSS) program elements for current and recently exited ELs

Policymaking Implications

SEAs need to account for the implications of instructional programs by

- (if appropriate) Determining what specific program environment(s) (LIEP, content classroom, etc.) might be most appropriate for reclassification-related observations
- Considering how multiple measure tools may need to be adjusted for LIEP parent refusals if LIEP teacher or classroom input is required for reclassification
- Considering how classroom accommodations, modifications, or RTI/TSS may factor into the perceptions of observers
- Determining what impact a change in reclassification could have on the size of LIEP programs across the state

(See Bond, 2020b; ESSA, 2015; Flores & Lewis, 2023; and Mahoney & MacSwan, 2005.)

Factor 3: Statewide Interest-Holder Engagement

Policymaking Considerations

Consider the landscape for interest-holder engagement:

- Requirements for interest-holder engagement activities that may currently be in place at the state and federal level
- Engagement levels of formal, state-level interest-holder groups, such as community advocates, professional organizations, activists, and statewide advisory committees
- Current avenues to capture the input of interest holders who are both highly engaged and less engaged with SEA staff

Policymaking Implications

SEAs need to account for interest-holder engagement by

- Brainstorming a full list of interest-holder contacts with state and LEA leaders
- Building out a strategy that incorporates diverse groups of interest holders across all areas of the state during each step of the reclassification policy change process
- Meeting interest holders where they are (e.g., community centers, schools) to optimize turnout

(See Bond, 2020b; ESSA, 2015; Mahoney & MacSwan, 2005; and Porter, 1996.)

Factor 4: Family Partnership

Policymaking Considerations

Consider the current environment for parental and caregiver partnerships:

- LEA bilingual family liaisons, translated materials, and multilingual advisory councils
- Current state policies and practices for communicating with the parents and caregivers of ELs in their primary language
- Regional and county networks for connecting with the parents and caregivers of ELs
- Research-practice partnerships (RPPs) to build out a strategy for aggregating and interpreting statewide data about parent and caregiver views

Policymaking Implications

SEAs need to account for parental and caregiver partnerships by

- Developing resources for various LEA roles to embed the perspectives of families before, during, and after reclassification policymaking
- Identifying and incorporating opportunities for parents and caregivers to contribute to the reclassification process
- Leveraging LEAs, regional and county networks, RPPs, and other groups to build trust with families who may be less inclined to be involved in government projects
- Considering strategies to collect and analyze large sets of family data (including parents and caregivers across all primary languages) about reclassification to understand how they view current reclassification criteria and how they would want information about new reclassification criteria communicated

(See Barrueco et al., 2016; Burho & Thompson, 2021; Hughes et al., 2016; Kangas, 2024; and Umansky et al., 2020.)

Factor 5: State Administrative Codes and Statutes

Policymaking Considerations

Consider the current environment for administrative codes and statutes:

- State reclassification policies may be grounded in administrative codes or statutes, which have varied requirements for input and approval.
- Some state administrative codes or statutes define the minimum ELP assessment cut scores.
- Some state administrative codes or statutes include provisions for multiple measures or local input.

Policymaking Implications

SEAs need to account for administrative codes and statutes by

- Building legitimacy with interest holders who can influence the input and approval of administrative codes or statutes
- Considering how administrative codes and statutes build consistency across LEAs
- Creating plans for updating or adjusting policies in the future based on emerging research and demographic shifts

(See Morales & Lepper, 2024; Porter, 1996; Rafa et al., 2020; and Villegas & Pompa, 2020.)

Factor 6: Federal Law and Non-Regulatory Guidance

Policymaking Considerations

Under ESSA and federal non-regulatory guidance, states must adopt criteria that are all of the following:

- Statewide for reclassification in all LEAs within a state
- Standardized for assessment cut scores and other measures
- Not reliant on academic content assessment results
- Approved by the U.S. government in the ESSA State Plan

Policymaking Implications

SEAs need to account for federal law and non-regulatory guidance by

- Emphasizing student readiness for grade-level instruction in English in indicators of proficiency that may move beyond a test-centric model
- Determining what implementational leverage states have in ESSA State Plan resubmission based on state and federal landscapes (if applicable) Creating qualitative or contextualized indicators that prioritize comparability across LEAs within a state

(See Cook et al., 2012; ESSA, 2015; Morales & Lepper, 2024; Neill, 2005; Porter, 1996; and U.S. Department of Education, 2019.)

Factor 7: Academic and Linguistic Proficiency Benchmarks and Relevant Data

Policymaking Considerations

Consider the current linguistic proficiency benchmarks and relevant data:

- Understand how new potential reclassification cut scores may impact the average years to attainment compared to current cut scores.
- Determine the degree to which language development changes based on grade and PLs, particularly how growth often slows at higher PLs and grade levels.

Policymaking Implications

SEAs need to account for academic and linguistic proficiency benchmarks and relevant data by

- Researching how changing reclassification criteria will impact growth targets in the state accountability system
- Standardizing metrics to offer administrative simplicity (e.g., domain and/or composite ELP scores)
- Assessing the viability of growth-based approaches, such as student growth percentile, that reflect language development over time and are less impacted by new reclassification policies

(See Bond, 2020b; Cimpian et al., 2017; Cook et al., 2012; ESSA, 2015; Hopkins et al., 2024; Kangas, 2024; Kim & Herman, 2012; Lee & Soland, 2022; Mahoney & MacSwan, 2005; Porter et al., 2019; and Sato & Thompson, 2020.)

Factor 8: Local Demographic Characteristics

Policymaking Considerations

Consider current local demographic characteristics:

- Analyze longitudinal data for the outcomes of ELs, exited ELs, and never ELs
- Determine the frequency of EL re-entry for monitored, former ELs

Policymaking Implications

SEAs need to account for local demographic characteristics by

- Researching how changes in reclassification policies impact demographic variation at the LEA level (e.g., EL density, home languages, intersectional needs) and what impact that could have on accountability n-sizes, EL class size, state LIEP requirements, and LEA funding
- Considering the appropriateness of cut scores for the range of students in the population, including possible unintended consequences

(See Bond, 2020b; Cimpian et al., 2017; Estrada & Wang, 2018; Flores & Lewis, 2023; Mavrogordato & White, 2017; NCES, 2023; Sahakyan & Poole, 2023; Sugarman, 2019; and Umansky et al., 2020.)

Conclusion

Reclassification is a significant milestone for ELs, potentially shaping their access to advanced academic coursework and broader educational opportunities. However, current practices remain uneven across states and often rely heavily on standardized test scores (Cimpian et al., 2017; Cook-Harvey et al., 2016; Neill, 2005). This overreliance oversimplifies the nonlinear nature of language development and risks either prematurely exiting students before they are ready or keeping them in EL status longer than necessary (Kim & Herman, 2012; Umansky, 2016). Both outcomes can produce unfairness, limiting opportunity and reinforcing “long-term EL” designation.

Approaches that incorporate multiple measures, growth-based models, and structured family and educator input offer more comprehensive and fairer ways of capturing student progress. These practices recognize that language proficiency is multidimensional and context-dependent, and they can help ensure that reclassification is not a barrier to opportunity. As noted, however, such approaches require resources. They require SEA and LEA capacity, professional learning, data infrastructure, and staff time to implement well. The feasibility of adopting flexible and nuanced reclassification criteria is affected by available resources and policy design.

Future research and policy should address how reclassification criteria and processes can more effectively account for the diverse needs of ELs, including ELs with disabilities and those with the most significant cognitive disabilities. Investigating how funding levels, SEA staffing, and data capacity influence state reclassification choices is an important area for further study. The understanding yielded from such research is important in assessing not only what policies are educationally sound but also which are realistically scalable. Exploration of alternate ELP assessments, appropriate criteria for reclassification of ELs with the most significant cognitive disabilities, and the role of multiple measures beyond standardized test scores is also needed. Educationally sound reclassification policy necessitates consideration of approaches that account for disability status, intersectional needs, and testing accommodations to ensure these students are not left in EL status indefinitely or reclassified without sufficient support.

Finally, continuous monitoring and evaluation are essential. Even well-designed policies can produce unintended consequences if not reviewed and refined regularly. States should embed mechanisms for ongoing evaluation that include both quantitative evidence (e.g., regression discontinuity, longitudinal outcomes) and qualitative insights (e.g., educator and family perspectives). This type of iterative process ensures that policies remain aligned with research evidence and the lived experiences of students.

Reclassification is not merely a technical decision; it is a policy practice that must weigh comparability, access, and feasibility. States that establish clear standards while allowing measured flexibility and invest in the capacity to implement more nuanced approaches are more likely to ensure reclassification serves as a gateway for access rather than a barrier for ELs.

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