

Public comment received on  
proposed regulations establishing an  
Alaska State Seal of Biliteracy.



PACIFIC LUTHERAN UNIVERSITY

LANGUAGES & LITERATURES DEPARTMENT

12180 PARK AVENUE SOUTH  
TACOMA, WA 98447

P 253.535.7321 or 253.535.7228  
F 253.536.5132

[www.plu.edu/languages](http://www.plu.edu/languages)

March 9, 2022

To: Members of the Alaska State Board of Education & Early Development  
Dr. Michael Johnson, Commissioner, Department of Education & Early  
Development

I am writing to you to request your support of the Seal of Biliteracy in Alaska. I currently serve as the Executive Director of PNCFL - the Pacific Northwest Council for Languages. Alaska is an active member state of our organization, and I have observed first-hand the hard work and advocacy that the language teachers and administrators of Alaska have been tirelessly doing to bring the Seal to Alaska. This is a grass-roots effort to celebrate all of our students and the linguistic and cultural assets and gifts they bring.

The Seal of Biliteracy is a national movement that celebrates language assets! It recognizes the skills that our students have, whether they acquired them in a classroom, through their heritage, through self-study, or any other means. The Seal recognizes the significance of second language proficiency while simultaneously emphasizing the importance of cultivating and maintaining strong proficiency in English language arts. To earn the Seal, students must demonstrate high levels of proficiency in both English and at least one additional language. The Seal is accessible to speakers of all languages - from those traditionally taught in our classrooms, to heritage languages, Indigenous languages, and any other spoken or signed languages.

I have been actively working with the Seal of Biliteracy in Washington State since it was signed by our Governor Jay Inslee in 2014. **Alaska is one of the few remaining states that has not yet fully implemented the Seal of Biliteracy.** I can attest that in my state, this program has had a huge impact, recognizing thousands of high school seniors each year who can read and write in another language as well as in English. In Washington, the program has awarded the Seal in over 80 languages. I have implemented the Seal at my university, to both celebrate students who already have proficiency in languages other than English and also to encourage students to continue their language study beyond high school.

If you would like additional information about the national Seal of Biliteracy movement, visit [www.sealofbiliteracy.org](http://www.sealofbiliteracy.org). Once Alaska passes the Seal, you have a cadre of teachers and administrators ready to enact the Seal, promote it, and support it in schools and communities all across Alaska. These advocates have a larger network of advocates in our region and in our country to support the implementation of the program.

If I can provide any additional information regarding the value of the Seal, please do not hesitate to contact me at [byaden@plu.edu](mailto:byaden@plu.edu) or 253-535-8330.

Sincerely,

Bridget E. Yaden, Ph.D.  
Professor, Hispanic and Latino Studies  
Executive Director, PNCFL  
ACTFL 2020 President



10 March 2022

Commissioner Dr. Michael Johnson  
Alaska State Board of Education & Early Development  
PO Box 110500  
Juneau, AK 99811-0500

Dear Commissioner Johnson and Members of the Alaska State Board of Education & Early Development,

The Joint National Committee for Languages (JNCL) and the National Council for Languages and International Studies (NCLIS) represents over 300,000 language educators and industry professionals throughout the United States. On behalf of our members, I write to you today to express our strongest endorsement of proposed regulation, 4 AAC 06.077, which would establish an Alaska State Seal of Biliteracy to recognize students who have studied and attained proficiency in English language arts and at least one other world language by high school graduation.

It is critical that Alaska join the 45 states and the District of Columbia in implementing a State Seal of Biliteracy. For today's students, the ability to utilize advanced multilingual communication skills gives a competitive advantage in the increasingly global job market and will serve as a significant engine of global cooperation for future generations in international relations, trade, and economic development. The Commission on Language Learning of the American Academy of Arts and Sciences released a report in February 2017, at Congress' request, which notes that "by several measures, the United States has neglected languages in its educational curricula. . ." Because of this neglect, the demand for world language skills among U.S. employers is outpacing the supply, especially among high-demand languages. America's world language skills gap has continued to increase and is deeply concerning. An Alaska State Seal of Biliteracy would provide the opportunity to prepare all students with the knowledge and skills necessary for success in our increasingly interconnected world and build upon the rich cultural and linguistic assets of Alaska's people.

By adopting this provision and implementing an Alaska State Seal of Biliteracy, the Alaska State Board of Education & Early Development will show its commitment to protecting Alaska's rich heritage of multiple languages and cultures and create a pathway to ensure Alaskan students have the best possible opportunities for their future. The decision to not support the establishment of an Alaska State Seal of Biliteracy would be a direct disservice to the students across Alaska, and we urgently and respectfully ask you to consider supporting proposed regulation, 4 AAC 06.077.

Sincerely,

Amanda Seewald  
President, JNCL-NCLIS

March 11, 2022

Commissioner Dr. Michael Johnson  
Alaska State Board of Education & Early Development  
PO Box 110500  
Juneau, AK 99811-0500

Dear Commissioner Johnson and Members of the Alaska State Board of Education & Early Development,

As an individual membership organization representing more than 12,000 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. Today, I am writing to express our support of proposed regulation, 4 AAC 06.077, which would establish an Alaska State Seal of Biliteracy. The purpose of the seal is to recognize students who have demonstrated proficiency in English and at least one other language by the time they graduate high school.

The Seal of Biliteracy (SoBL) has come a long way since California was the first state to establish a seal in 2012. To date, 45 states in addition to the District of Columbia offer state seal of biliteracy programs. **It is critical that Alaska joins that list.** In 2019 alone, more than 100K seals were awarded nationwide in more than 100 different languages, an increase from 2018 when we saw 92K seals in 66 languages. Despite the challenges of the pandemic, the number of seals issued continues to rise. This steady growth in seals issued and popularity of this initiative across the country demonstrates a simple fact: **our learners value bilingualism.**

Not only does the Seal of Biliteracy certify and document the proficiency of language skills of learners, but it is also a demonstration and acknowledgement of the value of language diversity, a way to strengthen intergroup relationships, and a recognition of multiple languages and cultures within communities. The SoBL also gives colleges and universities a method to recognize/give credit for language proficiency and gives students an advantage in their future job searches.

Recent [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 plan to enter the workforce immediately upon graduation or to seek an advanced degree. In fact, when surveyed, most U.S. employers across multiple sectors anticipate their demand for multilingual employees to increase in the next five years. Furthermore, 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. And as demand for language skills continue to increase among employers across many different industries, more students and their newly minted, recognition of language proficiency will demand a postsecondary education that can better prepare them for 21<sup>st</sup> century jobs.

As our economy recovers from recent events in the months and years ahead, a strong multilingual workforce will be an asset to enterprises seeking to rebuild, and multilingual citizens will play a key role in bringing our

---

local communities closer together with an even greater sense of inclusion and empathy. Strong support of the Seal of Biliteracy is imperative in achieving this goal.

A state with a linguistic diversity as rich as Alaska can demonstrate its commitment to languages and cultures by establishing a state Seal of Biliteracy program as soon as possible. We strongly recommend that you support proposed regulation, 4 AAC 06.077.

Sincerely,

A handwritten signature in black ink, appearing to read 'Howie Berman', followed by a long horizontal flourish.

Howie Berman  
Executive Director, ACTFL

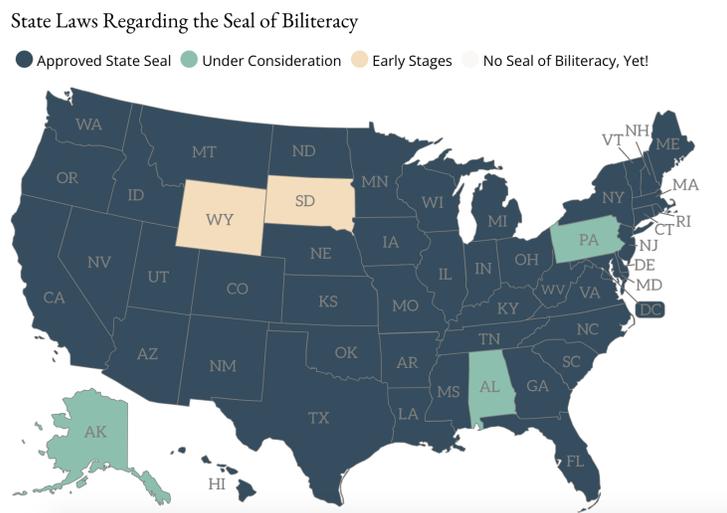


March 13, 2022

Commissioner Dr. Michael Johnson  
Alaska State Board of Education & Early Development  
PO Box 110500  
Juneau, AK 99811-0500

Dear Commissioner Johnson and Members of the Alaska State Board of Education & Early Development:

It is our understanding that 4 AAC 06.075 is under consideration and should be out for public comment shortly. As Alaska's only statewide professional organization of world language educators, K-16, we are writing to you to ask for your support in the adoption of a state-wide Seal of Biliteracy for the State of Alaska. To date, 45 states and the District of Columbia have adopted Seals. Alaska is one of the last 5 states without one. Ironically, we have one of the most linguistically-diverse populations. In a state with 20 official Indigenous languages in addition to English, a state Seal of Biliteracy is long overdue.



Lacking a state-endorsed Seal of Biliteracy, the Anchorage School District established, per national guidelines, a district-sponsored Seal of Biliteracy in 2015. To date, over 2,278 Seals have been awarded in the Anchorage School District alone, in close to 75 different languages. The Lower Kuskokwim School District established a comparable district seal several years ago, based on the ASD model, and has awarded many students with the seal, namely in Yup'ik.

Typically, the Seal of Biliteracy takes the form of a gold seal that appears on the transcript or diploma of the graduating senior and is a statement of accomplishment for future employers and for college admissions. A Seal of Biliteracy is a statement by the school system that mastery of two or more languages is important. It encourages students to pursue biliteracy, honors the skills our students attain, and can be evidence of skills that are attractive to future employers and college admissions offices. Although individual schools and districts can implement a Seal of Biliteracy, the vast majority are endorsed at the state-level, either through boards of education, through legislation, or through the governor's office. An Alaska-state-endorsed Seal of Biliteracy will have such a meaningful impact on Alaskan students as they move into the college/university or work world.

We ask of you, please support 4 AAC 06.075 and provide Alaskan students this unique opportunity, especially as they compete in college/university admissions and the workforce before them. Please do not let Alaska be the last state to adopt a Seal of Biliteracy. Thank you for your support and consideration.

Sincerely,

*Sasha Ringgenberg*

Sasha Ringgenberg  
President, AFLA

## Andrews, Janell L (EED)

---

**From:** Janeen C. Wilkins <janeenwilkins@me.com>  
**Sent:** Monday, April 11, 2022 8:00 AM  
**To:** Commissioner, DEED (EED sponsored)  
**Subject:** NOTICE OF PROPOSED CHANGES TO THE ALASKA STATE SEAL OF BILITERACY

You don't often get email from janeenwilkins@me.com. [Learn why this is important](#)

**CAUTION:** This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern:

As a World Language Teacher in the Anchorage School District and a parent of a Rilke Schule German School, I write in support of the creation of an Alaskan Seal of Biliteracy that does not include a GPA requirement. It is imperative that the State of Alaska follow in the footsteps of the other States in providing the means of honoring our students' language abilities.

The fact that we have the most diverse high school and its feeder schools in the nation as well as the numerous native languages in our state should make this policy change an obvious choice.

Please support our students in the State of Alaska and institute a State Seal of Biliteracy with no GPA requirement in the adoption of state regulation 4 AAC 06.077.

Thank you,

Janeen Ceprano Wilkins 907-602-9646 Sent from iCloud

April 12, 2022

To Whom It May Concern:

I would encourage you to support the upcoming legislative initiative to create a State of Alaska Seal of Bi-Literacy. Sadly, Alaska is one of five states that currently does not offer this to their students. It is time that our state joins the majority and celebrates the linguistic achievements of our students.

I am a Spanish teacher at Bettye Davis East Anchorage High School, recently declared the most diverse school in the nation. Every day I hear many languages other than English and I feel that it is important to not only recognize students who have learned a second language from scratch in school, but also to celebrate the students for whom English is a second (or third) language. The Seal does both.

If you would permit me to offer a suggestion. Please change the amendment 4 AAC 06.077. Seal of Biliteracy, section b, subsection (1) to read: (1) Demonstrate proficiency in English language arts by meeting the statewide minimum graduation requirements in English under 4 AAC 06.075 with a grade point average of 2.5 or higher on a scale of 4.0; **OR** one of the following: (list follows). This will acknowledge the hard work of students who are learning English as a second language or students who had a rocky start to high school but have turned themselves and their grades around.

This program is excellent. My students see it as a goal and work hard to obtain it. There is a lot of pride and excitement when they hear they got a 5! It says so much about their abilities to future employers or universities.

Please support this proposal.

Sincerely,  
Angela Nishimura  
World Language Department Chair  
Bettye Davis East Anchorage High School.

## Andrews, Janell L (EED)

---

**From:** Grove\_Yoko <Grove\_Yoko@asdk12.org>  
**Sent:** Wednesday, April 13, 2022 8:25 PM  
**To:** Commissioner, DEED (EED sponsored)  
**Subject:** Seal of Biliteracy

You don't often get email from grove\_yoko@asdk12.org. [Learn why this is important](#)

**CAUTION:** This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

I am writing this letter to encourage you to support the Seal of Biliteracy in Alaska. The Seal of Biliteracy highlights our students' proficiency in at least two languages and celebrates the accomplishment of learning another language and culture. It is a national movement, and currently, Alaska is one of only five states that does not offer the state approved Seal to the students.

The Seal is not only for English speaking students learning another language. It is for our ELL and Alaska Native students to highlight fluency in their native languages in addition to English. The adoption of the statewide Seal of Biliteracy is long overdue.

As a Japanese teacher at Bettye Davis East High School, which is the most linguistically diverse school in North America, I would like to ask to consider removing the GPA requirement since students are already required to take statewide tests which demonstrate their aptitudes in the areas of other subjects.

Sincerely,

Yoko Grove  
Japanese Teacher, Bettye Davis East High School



# Anchorage School District

---

## Education Center

5530 E. Northern Lights Blvd. • Anchorage, AK 99504 • 907-742-4000 • [www.asdk12.org](http://www.asdk12.org)

April 25, 2022

Commissioner's Office  
Department of Education and Early Development  
Attn: Regulations Review  
801 West Tenth Street, Suite 200  
P.O. Box 110500  
Juneau, Alaska 99811-0500

Dear Commissioner Johnson and Alaska Board of Education:

Just last month the State of Alabama became the 48<sup>th</sup> state in the U.S. to adopt the Seal of Biliteracy. Alaska and South Dakota are the last two states without a state-approved and adopted Seal. The concept of a Seal of Biliteracy started in 2008 in California as a way to recognize graduating seniors who possess proficiency in two or more languages, including English, at the time of high school graduation. 14 years and 48 states later, Alaska is still without such a recognition for students. For more national information please visit: <https://sealofbiliteracy.org>

The Seal of Biliteracy is an award given by a school, district, or state in recognition of students, who have studied and attained proficiency in two or more languages by high school graduation. In most instances, the Seal is awarded at the state level. However, in absence of an Alaska Seal of Biliteracy, the Anchorage School District launched our own District Seal in the spring of 2016. Since that time, ASD has awarded close to 2,000 Seals in over 20 different languages. The criteria ASD established to award the Seal was based on national guidance and is consistent with what most states require.

In most states, although the state is the sponsor of the Seal, and ultimately establishes criteria, guidelines, etc., it is up to each school district to “apply” to the state in order to offer the Seal, and further, it is up to each school district to manage the day-to-day operations of processing and awarding the Seal. In addition to Anchorage School District, I am aware that the Lower Kuskokwim School District also offers a district Seal of Biliteracy. Other districts, namely Mat-Su, Kenai Peninsula, Juneau, and Fairbanks have expressed interest in establishing Seals.

Not only does the Seal of Biliteracy certify and document the proficiency of language skills of learners, but it is also a demonstration and acknowledgement of the value of

---

*Educating All Students for Success in Life*

**Anchorage School Board** Margo Bellamy, President  
Andy Holleman, Vice President Kelly Lessens, Treasurer  
Carl Jacobs, Clerk Dave Donley

Pat Higgins  
Dora Wilson

**Superintendent** Dr. Deena Bishop

language diversity, a way to strengthen intergroup relationships, and a recognition of multiple languages and cultures within communities. The Seal also gives colleges and universities a method to recognize/give credit for language proficiency and gives students an advantage in their future job searches.

Alaskan students are at a disadvantage as they enter the college/university or work world without the option of “proving” their bilingual skills, compared to their peers from other states competing for the same admission, scholarships, employment, etc.

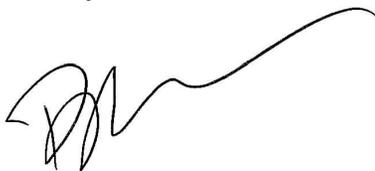
In a state as diverse as Alaska, with 20 official Alaska Native languages, in addition to English, what better way to highlight, support, endorse, and celebrate the uniqueness of this great state than to offer a state-endorsed and adopted Alaska Seal of Bilingual Literacy.

Alaska is a state without a World Language Specialist at the state-level, and Anchorage is the only district in Alaska with a World Language program supervisor/director. I mention this as I feel obligated to serve as an advocate for all districts in Alaska. The need and desire are there, but the overall bandwidth may be questionable. I am confident that once DEED approves a state Seal, we can develop guidelines and a “best practices” document to support other Alaska school districts in implementing a Seal of Bilingual Literacy.

One huge consideration and suggestion to the proposed regulations is the students’ grade point average. While a GPA is acceptable per national guidelines, it is in place when other statewide assessments are unavailable. ASD put the GPA in place given the lack of consistency between SBAs, AMP, PEAKS, etc. My recommendation is to remove the GPA requirement in lieu of new Alaska statewide assessments. Or if you prefer to keep the GPA in, then I would suggest an and/or situation. A GPA does not measure a student’s language ability in English, therefore, a statewide assessment is the preferred route to go.

Please let me know if you have any questions. I would be happy to speak with you about the importance of Alaska adopting a Seal of Bilingual Literacy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brandon Locke', with a long, sweeping flourish extending to the right.

Brandon Locke  
Director, World Languages and Immersion Programs  
Anchorage School District  
[Locke\\_Brandon@asdk12.org](mailto:Locke_Brandon@asdk12.org)