
INTRODUCTION TO

ENGLISH LANGUAGE LEARNERS & CULTURALLY RESPONSIVE PEDAGOGY

1ST EDITION



EDITED BY

DANIEL J GILHOOLY

Introduction to English Language Learners and Culturally Responsive Pedagogy

Critical Readings

First Edition

Edited by Daniel J. Gilhooly
University of Central Missouri

Bassim Hamadeh, CEO and Publisher
Angela Schultz, Senior Field Acquisitions Editor
Michelle Piehl, Senior Project Editor
Alia Bales, Production Editor
Emely Villavicencio, Senior Graphic Designer
Greg Isales, Licensing Associate
Natalie Piccotti, Director of Marketing
Kassie Graves, Vice President of Editorial
Jamie Giganti, Director of Academic Publishing

Copyright © 2021 by Cognella, Inc. All rights reserved. No part of this publication may be reprinted, reproduced, transmitted, or utilized in any form or by any electronic, mechanical, or other means, now known or hereafter invented, including photocopying, microfilming, and recording, or in any information retrieval system without the written permission of Cognella, Inc. For inquiries regarding permissions, translations, foreign rights, audio rights, and any other forms of reproduction, please contact the Cognella Licensing Department at rights@cognella.com.

Trademark Notice: Product or corporate names may be trademarks or registered trademarks and are used only for identification and explanation without intent to infringe.

Cover images:

Cover: Copyright © 2019 iStockphoto LP/monkeybusinessimages.

Cover: Copyright © 2018 iStockphoto LP/monkeybusinessimages.

Cover: Copyright © 2017 iStockphoto LP/FatCamera.

Cover: Copyright © 2016 iStockphoto LP/gradyreese.

Cover: Copyright © 2015 iStockphoto LP/FatCamera.

Cover: Copyright © 2013 iStockphoto LP/monkeybusinessimages.

Printed in the United States of America.

Brief Contents

Acknowledgments xiii

Introduction xv

- Chapter 1.** Getting Started Working With Culturally and Linguistically Diverse Learners 1
Daniel Gilhooly and Michelle Amos
- Chapter 2.** Second Language Acquisition: From Theory to Practice 21
Nabat Erdogan
- Chapter 3.** Corrective Feedback 43
Younghee Sheen and Rod Ellis
- Chapter 4.** Computerized Technology for Teaching ELLs 71
Christina Kitson
- Chapter 5.** Assessing English Learners: What Does It Look Like and Why Is It Important? 95
Lynn David Tarvin
- Chapter 6.** Latino Migrant 115
Velma D. Menchaca
- Chapter 7.** Culturally Responsive 125
Kathryn H. Au
- Chapter 8.** Teaching ELLs in Classrooms 137
Nan Li
- Chapter 9.** Ideal Classroom Conditions for Adolescent Newcomer English Learners 177
Lynn David Tarvin
- Chapter 10.** Lessons Learned: Insights Into One Teacher's Experience Working With
Karen Refugee Students in the United States 203
Daniel Gilhooly

Appendix A. First-Day Protocol Checklist for All Newcomers 229

Appendix B. Activities for Day 1 231

Appendix C. Computerized Technology for Teaching ELLs 233

Detailed Contents

Acknowledgments xiii

Introduction xv

Chapter 1. Getting Started Working With Culturally and Linguistically Diverse Learners 1

Daniel Gilhooly and Michelle Amos

Glossary 1

Who Are the Culturally and Linguistically Diverse Students

We Serve? 3

The Basics of Cross-Linguistic Communication 4

Serving All Students: ELL Performance in U.S. Public Schools 5

Legal Decisions 6

Immigration Policy 7

Refugee Students 8

What Is DACA? 8

Getting Started: How We View Our Students Matters 9

The Balancing Act 11

Student Biographies and Needs Assessment 13

Tips for Teachers! 14

Questions to Consider 15

Student Profiles 16

Student Profile 1: Edgar and Attendance 16

Student Profile 2: Issues of Motivation 16

Student Profile 3: Missing Your Best Friend 17

Student Profile 4: Identifying Issues Related to English Acquisition 17

References 17

Chapter 2. Second Language Acquisition: From Theory to Practice 21

Nabat Erdogan

Glossary 21

What Is Language Acquisition? 24

Theories of Language Acquisition 24

Stages of Second Language Acquisition 31

Age and Second Language Acquisition 33

Language Learning Settings 36

Implications From SLA Theory for Language Teaching 37

Tips for Teachers! 37

Questions to Consider 39

	References	40
Chapter 3.	Corrective Feedback	43
	Younghee Sheen and Rod Ellis	
	Glossary	43
	Types of Corrective Feedback	45
	Theoretical Positions	46
	<i>Cognitive Theories of Corrective Feedback</i>	46
	<i>Corrective Feedback in Sociocultural Theory</i>	49
	Pedagogical Positions	51
	<i>Should Learner Errors Be Corrected?</i>	51
	<i>When Should Learner Errors Be Corrected?</i>	52
	<i>Which Learner Errors Should Be Corrected?</i>	52
	<i>How Should Learner Errors Be Corrected?</i>	53
	<i>Who Should Correct Learner Errors?</i>	54
	Research into Corrective Feedback	55
	<i>Oral Corrective Feedback</i>	55
	<i>Written Corrective Feedback</i>	59
	Conclusion	62
	Notes	63
	References	64
Chapter 4.	Computerized Technology for Teaching ELLs	71
	Christina Kitson	
	Glossary	71
	Background	72
	For the Classroom Teacher	74
	General Language Skills	76
	Using Games to Teach Language	77
	Listening Skills	78
	Speaking Skills	80
	Reading Skills	82
	Writing Skills	84
	Grammar Skills	86
	Project Ideas and Application	86
	Future Thoughts	88
	Tips for Teachers!	89
	Questions to Consider	93
	References	93
Chapter 5.	Assessing English Learners: What Does It Look Like and Why Is It Important?	95
	Lynn David Tarvin	
	Glossary	95
	A Year of Assessment for English Learners	96

	<i>Day 1: Is This Student an English Learner?</i>	97
	Case Scenario	98
	<i>Days 2 Through 20: How Do Teachers Know the Prior Knowledge ELs Bring to Their Classes and What ELs Have Actually Learned From Class Instruction During the First Few Weeks of Class?</i>	100
	<i>Day 40: How Successfully Are ELs Learning During Class Instruction?</i>	102
	<i>Day 85: What Have ELs Learned During First Semester?</i>	104
	<i>Day 100: How Much Academic English Have ELs Learned This Year?</i>	106
	<i>Day 150: How Will ELs Perform on State and National Assessments?</i>	108
	<i>Day 180: What Happens Next for These ELs?</i>	110
	Why Do Schools Assess ELs?	110
	Every Student Succeeds Act	111
	Tips for Teachers!	112
	Questions to Consider	113
	References	114
Chapter 6.	Latino Migrant	115
	Velma D. Menchaca	
	Glossary	115
	Introduction	116
	Profile of the Migrant Family	116
	<i>Migrant Parental Involvement in Education</i>	117
	Educational Experiences of Migrant Students	118
	Culturally Relevant Teaching	119
	<i>Instructional Strategies for Migrant Students</i>	120
	The Challenges of Secondary Schools	121
	Conclusion	122
	References	123
Chapter 7.	Culturally Responsive	125
	Kathryn H. Au	
	Glossary	125
	Culturally Responsive Instruction: What Is It?	127
	Three Key Questions	127
	Classroom Structures for Participation	130
	<i>Whole Class Lessons</i>	130
	<i>Teacher-led Small Group Lessons</i>	131
	<i>Student-led Small Groups</i>	132
	<i>Individual or Independent Work Time</i>	133
	Conclusion	134
	Notes	134
Chapter 8.	Teaching ELLs in Classrooms	137
	Nan Li	
	Glossary	137
	Case Scenario	138
	<i>Planning to Teach</i>	139
	<i>Total Physical Response</i>	149

<i>Teaching Strategies</i>	150
<i>Using Visual Aids</i>	150
<i>Using Pictures and Images</i>	151
<i>Using Graphic Organizers</i>	151
<i>Relating to Existing Knowledge</i>	154
<i>Presenting Contextual Information</i>	158
<i>Other Useful Tips and Integrating Technology</i>	159
<i>Integrating Technology With ELLs</i>	169

Summary 175

References 175

Chapter 9. Ideal Classroom Conditions for Adolescent Newcomer English Learners 177

Lynn David Tarvin

Glossary 177

Case Scenario 179

Introduction 182

Ideal Classroom Conditions 182

Methods and Materials 182

Lesson Structure 191

Activities 192

Interactions 192

Room Organization 198

Tips for Teachers! 199

Conclusion 200

Questions to Consider 200

References 201

Chapter 10. Lessons Learned: Insights Into One Teacher's Experience Working With Karen Refugee Students in the United States 203

Daniel Gilhooly

Glossary 203

Background 205

Theoretical Framework 206

Burmese Refugees 206

The Karen: From Missionaries to Main Street 207

Resettlement to the USA 208

The Karen of Sandville, Georgia 208

Findings 209

Karen Educational Experiences in the Camps 209

Teacher is Boss 210

The Silent Karen 210

The Language Divide 211

Parent Involvement in Schooling 212

Teacher Perceptions 213

What is an A? 214

What's in a Name? 215

Sgaw Karen Language 216

Gender 218

Conclusions and Implications	218
<i>Ideas for Teachers: Utilizing Karen Funds of Knowledge</i>	220
Questions to Consider	222
References	222
Notes	226

Appendix A. First-Day Protocol Checklist for All Newcomers 229

Appendix B. Activities for Day 1 231

Lower Elementary to Middle School	231
Find Someone Who?: Upper Elementary to High School	231
Middle School to High School	232
References	232

Appendix C. Computerized Technology for Teaching ELLs 233

Suggested Activity: Website Review	233
Suggested Activity: Digital Tools Repository	234
Class Repository Document	234

Acknowledgments

THIS BOOK WOULD NEVER HAVE MADE it into print without the efforts of all the collaborators who participated on this project. I'd like to especially thank my colleagues at the University of Central Missouri, Nabat Erdogan and Christina Kiston; and thanks to Lynn Tarvin, the English Language Development coordinator for Raytown Schools; and the three teachers from KCIA who helped shape this book and currently teach the course the book has been designed for, Danielle Harris, Taylor Hernandez, and Fernando Sergio Navarro Lopez. Each of the contributors brings many years of K–12 teaching experience with culturally and linguistically diverse students to the pages of this book. We hope that this text will help better prepare teachers for the challenges and rewards that working with diverse populations entails.

I would also like to thank Dr. Ann McCoy for her support.

Introduction

THE FOLLOWING TEXTBOOK IS THE RESULT of a collaborative effort between various stakeholders trying to meet the needs of pre-service and in-service teachers working with culturally diverse students and their families in western Missouri. Many of the chapters were written by professors from the University of Central Missouri. All of the contributing authors bring a range of administrative, teaching, and research experiences to each of the topics. The text is also informed by the work of three K–8 teachers at Kansas City International Academy (KCIA), an urban charter school catering to high-population culturally and linguistically diverse (CLD) students.

In Chapter 1 Daniel Gilhooly and Michelle Amos offer an introduction to working with CLD students. This chapter first introduces readers to the variety of students identified as English language learners and also provides key background information related to working with CLD students. The chapter also provides some practical measures teachers can use to help begin to address the needs of their culturally diverse students. The chapter concludes with *student profiles* that provide pre-service and in-service teachers a starting point to better understanding the academic, cultural, emotional, language, personal, and social needs of their CLD students and their families.

Chapter 2, by UCM assistant professor Nabat Erdogan, provides readers an introduction to some of the key concepts related to second language acquisition. This chapter includes a review of the major concepts, theories, and stages of second language acquisition. The chapter concludes with some practical ways teachers can utilize their understanding of how languages are learned in their classroom teaching.

In Chapter 3, Younghee Shin and Rod Ellis provide insight into issues surrounding corrective feedback and the role it plays in teaching language learners. The chapter helps teachers begin to consider what errors look like and how they might best respond to learner errors.

The authors also include an introduction on how the various theoretical frameworks address error correction. Excellent sample transcriptions of learner errors help readers have a better sense of what errors look like and how various types of corrective feedback work in response.

In Chapter 4, Christina Kitson explores the ways technology can enhance student learning. This chapter provides some background on the various kinds of technologies available to teachers and concludes with some time-tested websites that teachers can use in their classes.

Chapter 5 looks at assessment as it relates to English language learners. Lynn Tarvin brings his expertise as an English language development (ELD) coordinator to frame the various assessments students take from their first day of school until they test out of support services. The chapter provides an introduction to the World-class Instructional Design and Assessment WIDA assessment and offers strategies that help teachers more equitably assess their CLD students.

In Chapter 6, Velma Menchaca presents an interesting overview of issues pertaining to Latino migrant students and their families. The chapter addresses important considerations for teachers working with Latino students and other migrant populations. Specifically, the chapter explores issues germane to culturally relevant teaching when working with Latinos, migrant family involvement, and the unique challenges of secondary school for Latinos and other migrant populations. The chapter provides teachers some insight into the realities associated with the Latino migration experience and schooling.

Katherine H. Au provides some introduction to culturally responsive teaching. In Chapter 7, Au provides teachers a working definition of what it means to be culturally responsive and then frames the chapter via three key questions. The chapter helps teachers consider how cultural differences can be integrated into classrooms and schools so as to benefit all students and communities.

Nan Li provides highly contextualized examples of the eight components of Sheltered Instructional Observation Protocol (SIOP) in Chapter 8. The chapter provides strategies that help teachers consider the ways to develop CLD students' English language repertoires. The chapter is replete with ideas and examples for all teachers to use in their classrooms. Importantly, Li walks teachers through the important process of deciding what language elements students need to develop their academic language proficiency.

In Chapter 9, Lynn Tarvin offers important insights into working with high school newcomer immigrants. The chapter looks at the student profiles of Anai and Roberto, two English learners with differing student biographies and language proficiencies. The chapter offers an important introduction to the types of obstacles these two students face as well as ways to help them develop their English via research-based strategies. The chapter also offers an introduction to systemic functional linguistics and its role in enriching language development.

Our final chapter, Chapter 10, offers readers important considerations when working with a specific group of CLD students and their families. While the chapter focuses on the Karen ethnic group, the chapter models the kinds of background information teachers need to consider when working with diverse populations of students. The chapter reinforces the importance of better understanding the cultural and linguistic backgrounds of their students so as to be better positioned to address students' emotional, linguistic, psychological, and academic needs.

Chapter 1

Getting Started Working With Culturally and Linguistically Diverse Learners

Daniel Gilhooly and Michelle Amos

Glossary

Term/acronym	Meaning	Usage
CLD	Culturally and linguistically diverse	A more nuanced term that views the student as a cultural being and not just a language learner
CRP	Culturally responsive pedagogy	The inclusion of students' culture, beliefs, language, values, and learning styles in instruction
DACA recipient (Dreamer)	Refers to someone who was brought to the United States as a child and is protected from deportation by the Deferred Action for Childhood Arrivals (DACA) policy (Dickerson, 2018)	Used to refer to those brought to the United States illegally by parents but who are often Americanized and have little or no experience with their parents' country of origin
EFL	English as a foreign language	Generally refers to the teaching of English in a non-English-speaking country by a non-native English speaker
ELL EL ELD	English language learner(s) English learner English language development	Generically used in reference to students learning English in a K–12 setting

(Continued)

Term/acronym	Meaning	Usage
Funds of knowledge	“... refers to those historically developed and accumulated strategies (skills, abilities, ideas, practices) or bodies of knowledge that are essential to a household’s functioning and well-being” (González & Moll, 1995, p. 446)	The recognition by teachers that culturally diverse students are an asset as they bring unique knowledge and skills into classrooms and schools
Idiom	A word or phrase that contains a meaning different from the literal definition	Common idioms include “up in the air,” “hang out,” “hit the books,” and “dropout”
L1, native language, mother tongue, primary language, home/heritage language	Refers to the language the child was first exposed to, usually, at home	Often used interchangeably to indicate a student’s first language
LEP	Limited English proficient	Often used to describe English learners in schools and on state and national policy documents
Newcomer	Often used to describe students who have been in the United States under 1 year and score below 1.9 on WIDA ACCESS test	Often used in schools to refer to a student who is new to English and potentially new to schooling
Refugee	“Someone who has been forced to flee his or her country because of persecution, war, or violence. A refugee has a well-founded fear of persecution for reasons of race, religion, nationality, political opinion or membership in a particular social group” (UNHCR)	A specific subgroup of immigrants, vetted through an extensive process and offered limited federal support with their transition to the United States

I try with school but not easy for me. I just want learning English first, only English. I never understanding teacher speaking in class. Just sitting. My teacher nice for me but I not learning the way I want. Many times I think stopping school. I need help my parent for everything. They need me for speaking, helping with everything and I tired. Many time I think why I come here [the US]. (December Htoo)

THE INTRODUCTORY QUOTE IS FROM AN interview with December Htoo, a 17-year-old ethnic Karen young man from Myanmar living and attending school in rural Georgia. His words represent some of the frustrations and realities for the growing number of **culturally**

and linguistically diverse (CLD) students in American classrooms. Moreover, it represents a high level of communicative competence (Hymes, 1972) of an **English language learner (ELL)**. Despite some language errors, December provides important insights into English language learning, the schooling of CLD students, and the motivations of many students to improve their English language ability. It also demonstrates his and other CLD students' frustrations with an education system that often fails to meet their needs.

December Htoo is one the 4.9 million students labeled ELL who were enrolled in public schools in the United States in 2016, according to data from the National Center for Educational Statistics (NCES). This number represents an increase of 28.9% since 2000, far outpacing the overall increase in public school enrollment, which increased 2.6% in a similar time period. In fall 2015, 9.9% of the total public school enrollments were labeled ELL students; in eight states over 10% of students were ELL; in California, these students represented 22.1% of public school enrollment (Migration Policy Institute, n.d.).

These increases reflect a historical trend. From 1998 to fall 2019, the number of ELL enrolled in public schools increased by 40%, from 3.5 million to 4.9 million (NCES, 2019a). This growth was most notable from 1995–2005, when ELL school enrollment increased by 105% while the general school population growth was less than 10% (National Clearinghouse for English Language Acquisition, 2019). Teachers from rural to urban districts are facing larger numbers of CLD students who have unique backgrounds and linguistic needs to succeed in U.S. schools. It is important to consider that not all CLD students are alike and have a variety of personal stories that have lead them to your community and school.

Who Are the Culturally and Linguistically Diverse Students We Serve?

While the majority of CLD students in U.S. schools are Latinos, there is a growing diversity throughout rural and urban districts across the country. It is important to realize that every family's story is unique. Students may be in your class for a variety of reasons. In rural areas, many migrants work agricultural jobs. Some families follow the seasons harvesting crops. Other families may be working at local pork, beef, or chicken farms or processing facilities. Small enclaves of immigrant communities are building their American experience in small towns in every corner of the country. Other parents or guardians may be in the United States on special visas to study or work at local universities or in medical professions, while others may be working in local restaurants and corporations at all levels of socioeconomic status. Some children are identified as English language learners even though they were born in the United States. Since they only spoke their home language until starting school it is no surprise they need support acquiring English. Other U.S.-born students may

speak English with a high degree of proficiency but lack reading and writing skills. A refugee student coming to your school may have not had any prior experience to schooling or English, while their classmate may be on an exchange program living with a host family in your community. The reality is that CLD students come from every region of the world and every level of English proficiency. However, the one characteristic that many CLD students share is their desire and need to acquire English.

Learning languages is a complex process that involves social, cognitive, and academic dimensions, and each can be daunting for learners and their teachers. The reality is that language acquisition is not easy, and schools have to take a holistic approach when it comes to their CLD students. Importantly, acquiring languages is not limited to the classroom. Rather, we learn language in every social interaction we encounter: in the classroom, on the court, in the playground, in the halls and cafeteria, and on the bus. Each of these settings are full of language exchanges where students can and will acquire language, if they are included. Creating a rich and supportive language-learning atmosphere is as much the responsibility of the office professionals, physical education teachers, and bus drivers as it is the English teacher. By following a few simple strategies all members of the school community can help develop students' English language proficiency.

The Basics of Cross-Linguistic Communication

A great starting point when considering cross-linguistic communication is our own language learning experiences. When we begin learning a new language it can feel as if everything we hear is a jumble of incomprehensible fleeing sounds. When we consider our own stories trying to communicate in a foreign country or when learning Spanish in high school it can help inform us on some fundamentals. The following six strategies can help everyone in the school ensure that CLD students are understanding what is being said and feel connected to their school.

1. **Speak slowly.** Most people tend to speak their first language at lightning speed. Think back to your own language learning experiences and how difficult it was to even capture one word when listening to someone speaking the language naturally!
2. **Modify the way we speak.** Be mindful of the words we use and all those idioms that we use in normal everyday communication. Expressions like “hit the books,” “hand in your assignment,” and “What’s up?” will most likely be new expressions to many English language learners. Try as you may, idioms defy logic and can baffle someone listening intently.
3. **Be clear and explicit** when giving instructions.
4. **Be aware of nonverbal communication.** So much of communication is nonverbal, and language learners are always sensitive to our expressions, body language, and gestures. Use these to full effect.

5. **Have fun** with the language differences. Try and speak the child’s language, if only to show them that you, too, struggle with language learning. They can laugh at your mistakes and learn to laugh at their own. Cross-cultural and cross-linguistic communication can be frustrating, but with the right attitude it can be a lot of fun for all and beneficial to all students.
6. **Have empathy.** It is never easy adjusting to a new place. Consider all the challenges you might face having to attend school in a language you did not understand and how tough it would be to fit in. Help CLD students get involved with their fellow students.

As we consider how to address the arrival of a new CLD student into our classroom it is important to have some understanding of the broader context related to working with diverse student populations. This is especially true in contemporary American society where issues of immigration, diversity, and globalism have become so polarized. This chapter aims to provide in-service and pre-service teachers the necessary context for the historical and legal issues that have shaped American policy and perspectives related to working with CLD students and families.

Serving All Students: ELL Performance in U.S. Public Schools

Students who are labeled as ELL are underperforming compared to their native English peers. Trend data based on the National Assessment of Educational Progress (NAEP) show that while average scores have increased or remained steady in both groups, the gap in performance has stayed the same or widened slightly. For example, in 2017, the average scale score for grade 4 reading was 225 for non-ELL students and 189 for students labeled ELL, an increase from 223 and 188, respectively, in 2007 (NCELA, 2019b). Comparative data for both reading and mathematics follow:

	2007		2017		Trend		Gap		
	ELL	Non-ELL	ELL	Non-ELL	ELL	Non-ELL	2007	2017	Change
Grade 4 reading	188	223	189	225	+1	+2	35	36	+1
Grade 4 mathematics	217	242	217	242	none	none	25	25	none
Grade 8 reading	222	263	226	268	+4	+5	41	42	+1
Grade 8 mathematics	245	282	245	284	none	+2	37	39	+2

NCES data from 2015–2016 also show that Hispanic students have lower high school completion rates (79.3%) than their Caucasian peers (88.3%). This is especially significant

as, since 1994, fewer than half of all public school students are White, and the percentage of those who are Hispanic has increased to 27.4%, or 13.9 million students.

It is no wonder that many ELLs are underperforming when we consider that most state and federal exams are not intended for CLD students and many teachers are unprepared to work with culturally and linguistically diverse populations. It is important that teachers working with these students help develop students' language repertoires while also helping them develop their academic development. We believe that an important first step in understanding students is having some sense of the historical and political decisions that have impacted and shaped the diversity of American society.

Legal Decisions

Although debates about immigration, language, and bilingualism in schools today often focus on Spanish speakers, German immigrants in Nebraska initiated the first pivotal case related to **heritage language** instruction in schools. In 1924, the case *Myers v. Nebraska* was filed in response to the Simon Act of 1919, which made it illegal in Nebraska for any public or private school to provide foreign language instruction before the eighth grade (Sudbeck, 2015). The law was challenged by parochial schools, and in 1924, the Supreme Court struck down the decision, which stands as one of the first decisions that provides protection for language minorities.

Nearly 60 years later, the *Lau v. Nichols* case of 1974 was a decision that directly impacted the teaching of CLD students. The case was taken up by Chinese students against the San Francisco Unified School District (Sugarman & Widess, 1974) and set a major precedent for the teaching of ELL students. At the center of the complaint was the failure of the schools to address the language needs of the roughly 1,800 Chinese complainants who did not speak English as a first language. The Supreme Court decision in favor of the students later established the **Lau Remedies**, which provided a basic framework to guide schools in addressing the needs of their English language students (ELL).

The landmark decision of the 1982 case *Plyler v. Doe* has had a major impact on immigrant children's education (Olivas, 2012). The Supreme Court decision holds that states cannot constitutionally deny students a free public education based on their immigration status. In short, schools cannot demand documentation proving American citizenship to register for school. Interestingly, the Court's decision was pragmatic, concluding that excluding children from education would have harmful effects on society. The Court stated, "By denying these children a basic education, we deny them the ability to live within the structure of our civic institutions, and foreclose any realistic possibility that they will contribute in even the smallest way to the progress of our nation" (*Plyler v. Doe*, 1982).

These cases represent only a few of the major legal cases that have impacted CLD students, their families, and the teachers and schools working to accommodate them. While the courts have had direct effects on the education of CLD students, national policies have also shaped American immigration and the ethnic diversity of American schools.

Immigration Policy

In September 2019, at a naturalization ceremony in Kansas City, Missouri, 383 people from 84 countries became naturalized as U.S. citizens. Similar ceremonies take place throughout the country periodically each year and are a testament to the growing diversity of the U.S. population. However, such diversity of immigrants is relatively new in the United States. A multitude of legal decisions have altered U.S. immigration policy and deserve some attention. We focus on the following immigration decisions to better inform teachers on the role national policies have had on immigration and the diversity of U.S. communities and schools.

The **Naturalization Act** of 1906 required that all immigrants speak English in order to become naturalized citizens (Ragsdale, 2013). This act alone may have precluded many living in the United States to attain citizenship. In 1924, the **Johnson-Reed Act** was signed into law by President Coolidge and established a race-based quota system that restricted Italian, Jewish, Polish, and Asians from immigrating to the United States (Ngai, 1999). The law was not replaced until 1965, and it has played a role in shaping American perspectives on immigration (Ngai, 1999). An earlier act, the **China Exclusion Act of 1882**, specifically prohibited Chinese immigration until 1943 with the Magnuson Act, which only allowed 105 Chinese to immigrate per year, and that act was not abolished until 1965.

President Lyndon Johnson signed the **Immigration and Nationality Act** in 1965, which would “transform the United States into a society of diverse cultures, religions, and ethnic groups (Ragsdale, 2013, p. 172). Much of the diversity would come from the growing number of refugees that would be admitted in the 1980s and 1990s.



FIGURE 1.1 Uncle Sam and anti-Italian immigration, 1903.

Source: <https://digitalcollections.nypl.org/items/c146bf32-7fda-68d3-e040-e00a1806693f>.

Refugee Students

While much of the public and policy attention on immigration has focused on border crossings along the U.S.-Mexican border, refugees from across the globe have been resettling to the United States since the end of WWII. Since the **Refugee Act** of 1980, the United States has resettled more refugees than any other country in the world. Initially, in the 1980s and early 1990s, the refugee resettlement program resettled majority Vietnamese, Laotian, and Cambodian populations due to the U.S.'s involvement in the Vietnam conflict. In the 1990s, refugees from post-Soviet countries represented the largest groups resettled. The largest groups resettled over the past 20 years have been from Burma, Iraq, Somalia, Bhutan, and the Democratic Republic of the Congo.

According to Igielnik and Krogstad (2017), more than three million refugees have been invited to live in the United States since 1975. Annual refugee arrivals are typically between 40,000 and 70,000, though these numbers have declined to a low of 22,500 for 2018 under the Trump administration (MPI, n.d.). The immigration experience is often very traumatic; however, refugee families face particularly severe traumas on their journey from their native countries to the United States. Those traumas include but are not limited to loss of family and friends to war, rape, and other physical violence; persecution or the fear of persecution; disruption of schooling; displacement from their native homes; economic deprivation; protracted stays in refugee camps; loss of citizenship, and a host of other deprivations and traumas. Importantly, trauma continues as families try and adapt to their new lives in the United States. Recognizing the lasting impact of these experiences is key to providing trauma-informed care in the classroom.

While refugee families tend to place a high value on education, they often lack the skills to support their children's academic success (Gilhooly, 2015; Matthews, 2008). Teachers, administrators, and support staff each play a major role in helping students and families succeed but too often do not have the skills to support them. Later in this chapter we outline some important considerations for teachers and administrators when a new CLD student arrives in their classroom and school.

In addition to refugee children, a new category of "immigrants" has emerged in the CLD community that has its own set of unique challenges teachers need to recognize. Dreamers (DACA recipients) have become the focus of much political and media attention in recent years. Teachers need to be aware of the unique immigration limbo of these recipients.

What Is DACA?

Much of the public and policy debates of the past years have focused on those who have become known as dreamers or DACA recipients. Deferred Action for Childhood Arrivals (DACA) is a U.S. immigration policy that was established under the Obama administration, which allows some individuals in the United States who were brought to the country unlawfully as

children to receive a renewable 2-year period of deferred action from deportation (Dickerson, 2018). This allows recipients to be eligible for a work permit or to pursue higher education. While many have called for an end to the program and the deportation of those covered by the policy, others harken back to the Supreme Court decision of *Plyler v. Doe*, acknowledging that children should not be punished for the actions of their parents. Regardless of where an individual teacher stands on the debate, it is important to recognize that the loss or the fear of loss of such a protection has an impact on children and families. Families throughout the United States live in fear that a parent, grandparent, spouse, or other family member may be deported. As a response to such stress, students' attitudes toward school may be affected.

Getting Started: How We View Our Students Matters

Too often teachers, classmates of CLD students, parents of classmates, and others working with CLD students assume a **deficit perspective** on the learning environment where ELL students are placed. Most teachers have good intentions but only are able to see the struggles and obstacles facing the student. Teachers readily identify what their CLD students cannot do but often do not consider the wide range of experiences, knowledge, perspectives, styles of learning, values, and languages these students and families bring with them into our schools and communities. In short, teachers do not always see their students in terms of the **funds of knowledge** (González et al., 2006) they bring to the classroom and wider community. While identifying student needs is an important consideration, teachers must see beyond these limitations by acknowledging the assets these students bring. This change of perspective can be transformative for teachers and students.

A salient example of this is represented by the following two cases. Hser Htoo, a 17-year-old and a junior in high school, struggled academically and linguistically but was a very capable artist who often drew for enjoyment. He had notebooks filled with drawings, cartoons, and other designs. Once his teacher perceived him as a talented artist, she began to make her assignments more pictorial than language based. Expressed admiration for his skills did not go unnoticed, and Hser Htoo began to show his art and feel pride in his ability. Assignments that allowed him to showcase his ability made them much less of a frustration, and he worked with enthusiasm. Purely pictorial assignments slowly merged with short, written texts or speech bubbles in his native Karen and later in English. Over time, Hser Htoo became a more proficient and confident English writer. The drawing in Figure 1.2 demonstrates how such pictorial assignments can act as a means for students to often describe some of their anxieties, fears, and experiences. Hser Htoo's drawing of his first day on the school bus demonstrates his artistic skills, but his speech bubble lets us in on the range of emotion he was feeling.

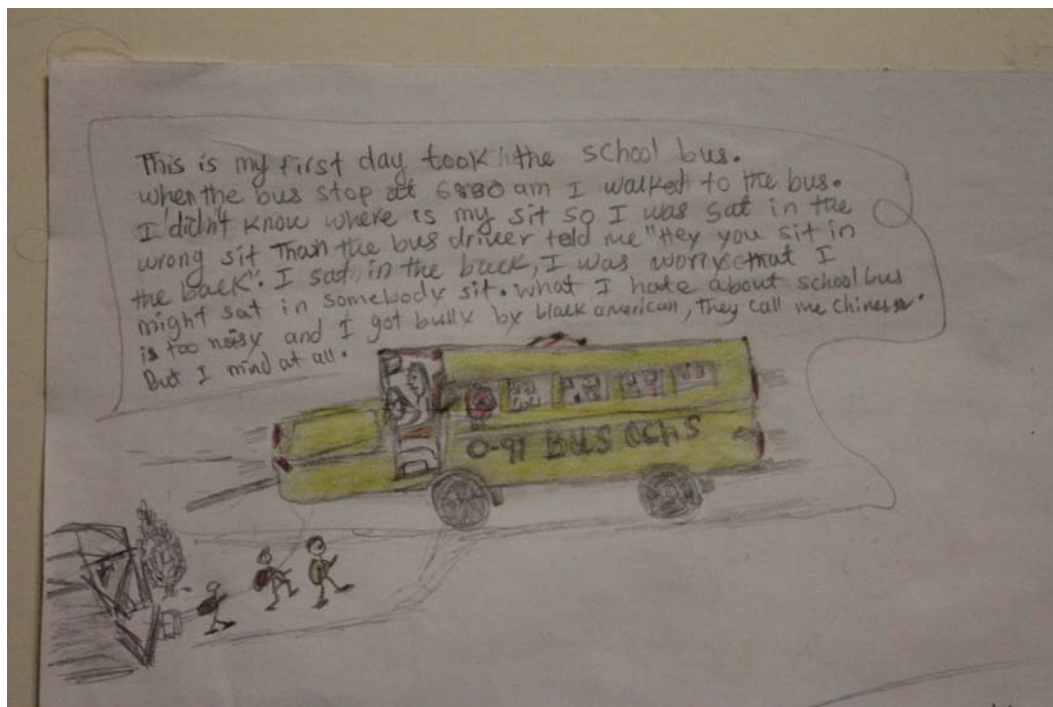


FIGURE 1.2 First day of school on the school bus.

Source:

The second example is of Hector, a 13-year-old from El Salvador. Hector struggled in math, and his teacher was desperate to find ways that she could be more culturally responsive in her approach to working with him on his math. She began trying to find out more of Hector's story so as to help integrate some of his funds of knowledge. When talking to the district's Spanish language interpreter she learned that Hector's family owned a small grocery store back in El Salvador and had recently opened a small convenience store not far from school. His teacher decided to visit the store to see if she could learn more about Hector. When she walked into the store she was surprised to see Hector working behind the register. After many visits she came to realize that Hector had many responsibilities at the store. He was an interpreter for his parents and various vendors and customers. He helped his father take care of inventory and helped with submitting various orders. He also helped his parents clean and stock shelves. She soon realized that Hector had many real-life math skills but that he associated math with Spanish since he always communicated with his father in Spanish. She came to realize what Hector lacked was the language of math in English. He had the ability but was unable to express himself. In response, she created math lessons that integrated concepts he was aware of from working at his family store. She also provided him

experience with some of the authentic texts he was using at the store. She was able to collect various forms and applications that gave him real-world experience.

In both cases, teachers took an asset approach to how they viewed their student. By incorporating a CLD student's assets (home language, skills, funds of knowledge) into lessons, a teacher also sets an important precedent in the classroom and represents an example of **culturally responsive pedagogy (CRP)**. Other teachers, classmates, and parents will begin to recognize that their CLD classmates are valuable additions to the learning experience and the wider community. We suggest that teachers learn as much as they can about the unique backgrounds via student biographies, presented later in this chapter.

While respecting and integrating students' home culture and learning styles is important, it is also important that we acknowledge students' home language. Too often teachers and schools have "English-only" policies that result in students having a negative perception toward their home language. Students' home language needs to be seen as an asset, especially in a globalized world where speaking multiple languages is beneficial. Teachers also need to inform themselves about their students' home language so as to better understand the issues the student may be facing learning English. Most importantly, teachers need to inform parents that promoting the child's L1 at home is a positive attribute in the child's cognitive, emotional, and academic development. Too often parents wrongfully perceive of their language practices as obstructing their child's English development. The reality is that literacy skills in the learner's L1 are important in helping development L2 literacy skills. Importantly, the child will benefit by speaking their home language so as to develop healthy, communicative relationships with their parents and grandparents.

Teachers can help promote students' L1 in their classroom to the benefit of all students. By using books or other curricular material in students' home language, they will demonstrate respect for their language and help bridge the school-home divide. CLD students will begin to see the advantages associated with knowing an additional language and may begin to feel pride in their heritage language. Importantly, by incorporating languages like Spanish into the curriculum, all students will benefit from learning new words and phrases and the CLD student will benefit from his or her position as expert.

The Balancing Act

Like learning a new language, learning a new culture can be fraught with frustrations and misunderstandings. Some students may have very little experience with American culture and the norms of American schools. Consider all the school idioms that we use every day. Expressions like "hand in" and "exit ticket" are sure to confuse an English language learner. Other students may feel very American and reject their home culture

and the values of their parents and grandparents. Incorporating the strategies addressed in this and later chapters will help teachers begin to be more culturally inclusive in their teaching practices. However, we must be sensitive to the individual person's needs and their process of acculturation.

The reality is that some CLD students do not want to be identified as anything but “student” and may resist being associated as representatives of their heritage culture. This creates a problem for the teacher who is hoping to be culturally responsive. Moreover, when a student has a negative attitude toward their home culture there invariably may be difficulties at home as they struggle with parental expectations. So, should a teacher incorporate the students' home culture and language when a student is resisting?

The answer to this and other questions related to CLD students depends on the individual student and the awareness of their teacher. The key lies in the teacher's ability to make each child feel pride in his or her cultural heritage. While culture may include ethnic pride or linguistic pride, it also includes a host of other attributes. This means that the teacher continually demonstrates a positive response to that culture and uses the child as a cultural insider rather than as a representative. This takes away the burden of being the poster child for any given culture. This may also address one of the reasons that some children do not like being identified as a cultural representative in the first place: It makes them feel that their identities are limited to a few stereotypes.

In practice, this demands some mindfulness on the part of teachers. Teachers have to first assess where the student stands in terms of their identity. Rather than making students representatives, we need to find subtler ways of legitimizing their home culture. For older students, questions about culture and identity can be parts of the curriculum. Discussions about the pros and cons of various cultural norms can help all students better understand their own identities and that of their families. For teachers, a genuine sense of interest, wonder, and curiosity is needed.

The teacher must be willing to learn more about other cultural values and beliefs. Ideally, teachers can draw from their own cross-cultural experiences or be willing to learn about the cultures of those children in their school. This would include some insight into the history, language, and culture (music, religion, famous popular personalities, geography, food, dance, film, arts). Ideally, these cultural expressions would all find their place in lessons and on the walls of classrooms and schools. This knowledge can also help teachers help students have a more positive association with their heritage culture. Students may take pride when they realize all the positives associated with their heritage. Negative perceptions of self and home can lead to children losing self-esteem and distancing them from their families. Creating student biographies is an important first step in better understanding your CLD student's individual story.

Student Biographies and Needs Assessment

Biographically driven, culturally responsive teaching is an important step in learning more about CLD students and being able to effectively address their needs (Herrera & Murry, 2016). Through student biographies, teachers begin to contextualize the CLD student's singular story. This information will help teachers better understand and address a student's academic, emotional, language, psychological, and social needs. By creating such biographies, teachers will begin to also view students as individuals and not simply categorize or stereotype them based on their ethnic or national background. The following eight considerations can provide teachers a starting point when creating student biographies.

Creating Student Biographies

1. Basic biographical information

- Age: How old was the student when they arrived in the United States?
- Country of birth:
- Siblings: Are there siblings in school that might be able to assist you with information?
- Parents or guardians: How can you make contact with parents?
- How long has the student been in the country, the state, and the city?
- Ethnicity: Students may come from an ethnic minority group from their home country. For example. Do not assume that someone who is "from Thailand" is ethnically Thai.

2. L1 considerations

- What language(s) does the student speak at home?
- What is their level of L1 proficiency in speaking, listening, reading, and writing?
- What language system is the student's L1: alphabetic, syllabic, pictographic?
- What is the directionality of the L1: left to right; right to left; top to bottom?
- What is the word order of the L1: subject-object-verb; subject-verb-object?

3. Parental considerations

- How can you contact the student's parent or guardian?
- What is the parents' preferred language of communication?
- What experience do the parents have with the U.S. education system?
- Do parents know their role in supporting their children?
- What are the parental funds of knowledge (González et al., 2006)?
- What is the parents' literacy ability in their L1 and/or English?

4. Child's attitude toward home culture

- In what ways does the child demonstrate pride or shame of home culture and language?
- Has the student experienced trauma in their home country or on route to the United States?
- How can teachers help promote pride in students' heritage culture and language?

5. Prior experiences with school

- Does the child have any experience with school? Do parents have any formal education?

6. Political context

- What was the child and family’s experience in their home country?
- What stressors/traumas might the child and/or family be under in the United States (fear of deportation, persecution of family members in the home country, deportation of family members)?
- How are U.S. policies and the public rhetoric impacting immigrant families?

(Continued)

7. Language needs assessment

- Begin to identify demonstrable language needs in English and establish goals accordingly.
- Document characteristics of the learner’s proficiency in speaking, listening, reading, and writing.

8. Asset perspective

- What talents does the child demonstrate?
- What are the student’s interests inside and outside of school?
- Who are the child’s friends?
- Who are the child’s heroes?
- What does the student do after school?
- What are their responsibilities in the home?

Working with CLD students can be a rewarding and fascinating experience for teachers willing to include these students in their classrooms. We also encourage in-service and pre-service teachers to utilize our first-day checklist (appendices A and B) to help them start their experience with CLD students on the right foot.

The following “Tips for Teachers” section also provides some important insights for both pre-service and in-service teachers who prepare to work with CLD students and their families.

TIPS FOR TEACHERS!

What’s in a Name?

There are a wide variety of naming conventions used across cultures. Do not assume that a student’s name on the roster follows the same naming practices as in the United States. Look at a few naming practices from various cultures. Too often students get stuck with a name assigned to them, which offers teachers a perfect time to begin to recognize students’ unique cultural conventions.

Deegala Doraga Mayuri Silva (Sri Lanka Sinhalese): The first two names are paternal lineage names. The student’s “personal name” is Mayuri and the family name is Silva.

Eh Taw (Love Truth) and Paw Htoo (Flower Gold) (Karen): These two ethnic Karen siblings do not share a “family name”; family names or surnames are not used in their culture.

Kim Mi Hyun (Korean): In Korean culture the family name proceeds other names.

Pedro Maria Rodriguez Lopez (Mexican): In this example, Lopez represents the father's first surname and Rodriguez is also a surname. According to Mexican naming conventions, a person's first surname (Rodriguez, in this case) is the father's first surname, and the second surname (Lopez, in this case) is the mother's first surname.

*Remember, some students may feel uncomfortable referring to their teacher as Ms. Julie or Mr. Brown as teachers are usually referred to with a title in many cultures.

Comprehensible Input and Working With Parents

A major consideration when working cross-culturally and cross-linguistically is to make ourselves understood. Here are a few tips when talking to CLD students and parents.

- Laughing at our mistakes: One way that can help set a relaxed mood is to demonstrate that language mistakes and miscues are funny and nothing to be ashamed of when speaking a new language. Teachers can model this by trying to say things in the student's L1. This should evoke a chuckle and set a friendly tone.
- Even though the school provides an interpreter, maintain eye contact with the parent in your discussions. Too often, teachers speak with the interpreter and not the parent.
- Parents often speak more English than they reveal. Be an empathetic language partner and speak slow and clear but not so slow and loud as to offend.
- Avoid idioms and other Americanisms that may be new to students and parents.

Questions to Consider

1. Consider the introductory quote from December Htoo and list all the frustrations that CLD students face in school and society. What are your thoughts on his belief that language should be addressed first? Consider how you might feel in his shoes.
2. Consider one of the legal decisions related to CLD students and try and find more information about that particular decision and how it relates to working with CLD students and families.

3. Create an activity you might employ whenever you have a new CLD student that will help that student feel included. Make sure the activity includes some means for everyone to learn how to pronounce the student's name.
4. Discuss any cross-cultural experiences that you have had and how they have affected your views on cross-cultural and cross-linguistic communication.
5. Consider one of the following student profiles. Identify the key issues and ways you might address the needs of the particular student and teacher.

Student Profiles

The following CLD student profiles are from teachers writing about their students in the first week of a new semester. These also represent excellent student biographies, as each demonstrates how well informed the teacher is of their student. The names and other information have been changed in order to maintain anonymity.

Student Profile 1: Edgar and Attendance

Edgar (prefers to be called Eddy) Mario Lopez is an outgoing and rambunctious 15-year-old sophomore in high school. He was born in the United States to Mexican parents. Edgar speaks Spanish at home with his parents and grandmother but English with his younger siblings. He has very limited Spanish writing proficiency. He is taking Spanish 1, and his teacher told me that he has a very difficult time spelling and that his Spanish grammar is very poor. He has been identified as an ELL since he arrived in the district and receives English language support three times each week, but I don't know what he is doing. It is supposed to be aligned with my classes, but since he is bussed to another school for ESL, I've never met his teacher there. He is a class clown, and his attendance has been poor the first weeks of school. His ninth-grade teacher indicated that his attendance started to slide at the end of last school year, and she said he was with the "wrong crowd" and was "maybe in a gang." No prior records of him exist because he has only been in the district the past 2 years. I'm not sure of the gang thing, as I don't see any signs, but I don't know. One of his friends in class said he thought something was going on at home, but he wasn't sure. *What can I do to get Edgar to school?*

Student Profile 2: Issues of Motivation

Asnage, pronounced "Az Na Jae," Normand is 12 years old and in sixth grade. He and his family are from Haiti. Asnage's L1 is Haitian Creole. His language proficiency in his L1 is mostly conversational. He is literate in French Creole and speaks this language at home with relatives. Asnage generally appears to show a positive attitude toward his L1 and home culture. When given the chance, he likes to talk about places in Haiti. However, he exclusively

uses English at school and has been hesitant to talk about what life was like in Haiti. Asnage and his family are refugees from Haiti after the earthquake in 2010. They arrived in the Midwest in 2012 after 2 years with an aunt in Miami. As a sixth-grade student, Asnage has only been at our middle school for 7 months. His mom comes to all our parent-teacher conferences and is involved, and he is at grade level or above in math. He is polite and quiet but very unmotivated. Everyone seems to like him, but he seems tired every day and too laid back. His English writing makes all his classes but math difficult, and he seems to be giving up with school. *What do I need to do to motivate Asnage?*

Student Profile 3: Missing Your Best Friend

June, pronounced the same as the month, Paw, pronounced like a cat's "paw," is ethnic Karen, 11 years old, and in fifth grade. Her parents are from Burma (Myanmar), but she was born in a Thai refugee camp. According to the translator at school, she speaks Karen at home with her mom, grandma, and siblings, is the oldest of five, and is really active at her Karen church. She has lived in the United States for 3 years. June is very quiet but excels in drawing and singing. She often wears her Karen shirt to school. Her previous teachers held her back so that she should be in sixth grade. She is disappointed and pretty despondent this year because she is no longer in class with her cousin, Moo Moo (like the sound of a cow!). Moo Moo is a model student in all her subjects and helps out with June Paw and other Karen kids. *Why were these two kids separated? How can I reach June? She seems a million miles away!*

Student Profile 4: Identifying Issues Related to English Acquisition

Sofia is a 6-year-old kindergartner from Mexico. I am not sure when she and her family arrived in the United States, but I know she now lives with her mom and younger brother. She is a joy in class but demonstrates a few language issues I have identified in week one. Some errors I found are in pronunciation, vocabulary, speaking, writing, and grammar. When pronouncing words, Sofia says her words long and slow. Her "v" is often replaced with "b." Her vocabulary is also still developing. On the district-wide assessment, vocabulary is one of her lowest scores. She has used the word "fork" when talking about a spoon and often must ask what a word means. When speaking, her words are often out of order, and her writing is also. She will write sentences that say, "The dog funny. The dog brown." When writing she leaves out verbs, like /is/, and often mixes up the words "he" and "she." Some errors are common in kindergarten, and others are due to her first language, I think. *How can I begin to address her needs when I have 16 other kids in class?*

References

- Dickerson, C. (2018). What Is DACA? And how did it end up in the Supreme Court. *New York Times*.
<https://www.nytimes.com/2019/11/12/us/daca-supreme-court.html>
- Georgis, R., Gokiert, R. J., Ford, D. M., & Ali, M. (2014). Creating inclusive parent engagement practices: Lessons learned from a school community collaborative supporting newcomer refugee families. *Multicultural Education*, 21(3/4), 23–27.
- González, N., & Moll, L. C. (1995). Funds of knowledge for teaching in Latino households. *Urban Education*, 29(4), 443–470.
- González, N., Moll, L. C., & Amanti, C. (Eds.). (2006). *Funds of knowledge: Theorizing practices in households, communities, and classrooms*. Routledge.
- Herrera, S. G., & Murry, K. G. (2006). Mastering ESL and Bilingual Methods: Differentiated Instruction for Culturally and Linguistically Diverse (CLD) Students. *Education Review/Reseñas Educativas/Resenhas Educativas*.
- Hymes, D. (1972). On communicative competence. *Sociolinguistics*, 269–293.
- Igielnik, R., & Krogstad, J. M. (2017, February 3). *Where refugees to the U.S. come from*. Pew Research Center.
<https://www.pewresearch.org/fact-tank/2017/02/03/where-refugees-to-the-u-s-come-from/>
- Ladson-Billings, G. (1995). Toward a theory of culturally relevant pedagogy. *American Educational Research Journal*, 32(3), 465–491.
- Matthews, J. (2008). Schooling and settlement: Refugee education in Australia. *International studies in Sociology of Education*, 18(1), 31–45.
- Migration Policy Institute. (n.d.). *ELL information center*. <https://www.migrationpolicy.org/programs/ell-information-center>
- Migration Policy Institute. (2019, June 13). *Refugees and asylees in the United States*. <https://reliefweb.int/report/united-states-america/refugees-and-asylees-united-states>
- National Center for Educational Statistics. (n.d.). *Fast facts: Back to school statistics*. <https://nces.ed.gov/fastfacts/display.asp?id=372>
- National Center for Educational Statistics. (2018). English language learners in public schools. *The Condition of Education 2018*. https://nces.ed.gov/programs/coe/pdf/Indicator_CGF/coe_cgf_2018_05.pdf
- National Center for Educational Statistics. (2019a, February). *Indicator 8: English language learners in public schools*. https://nces.ed.gov/programs/raceindicators/indicator_RBC.asp
- National Center for Educational Statistics. (2019b, May). *English language learners in public schools*. https://nces.ed.gov/programs/coe/indicator_cgf.asp
- National Clearinghouse for English Language Acquisition. (2019). *English learner trends from the nation's report card*. https://ncela.ed.gov/files/fast_facts/ELs-NAEP_Card.pdf

- Ngai, M. (1999). The Architecture of Race in American Immigration Law: A Reexamination of the Immigration Act of 1924. *Journal of American History*, 86(1), 67–92. <https://doi.org/10.2307/2567407>
- Olivas, M. A. (2012). *No undocumented child left behind: Plyler v. Doe and the education of undocumented schoolchildren*. New York University Press.
- Plyler v. Doe, 457 U.S. 202, 230 (1982)
- Ragsdale, S. (2013). Immigrants in the United States of America. *Advances in Historical Studies*, 2(3), 167–174.
- Rhodes, R. L., Ochoa, S. H., & Ortiz, S. O. (2005). *Assessing culturally and linguistically diverse students: A practical guide*. Guilford.
- Roberts, C. (1994). Transferring literacy skills from L1 to L2: From theory to practice. *Journal of Educational Issues of Language Minority Students*, 13, 209–221.
- Sudbeck, Kristine M. (2015). Educational Language Planning and Policy in Nebraska: An Historical Overview. *The Nebraska Educator: A Student-Led Journal*. 25. <http://digitalcommons.unl.edu/nebeducator/25>
- Sugarman, S. D., & Widess, E. G. (1974). Equal protection for non-English-speaking school children: *Lau v. Nichols*. *Calif. Law Review*, 62(1), 157–182.
- UNHCR, the UN Refugee Agency. What is a Refugee? Definition and Meaning: USA for UNHCR. (n.d.). <https://www.unrefugees.org/refugee-facts/what-is-a-refugee/>