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Balancing Tongues: ESL Programs in Combating Asian American Stereotypes

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Abstract

To many immigrant students and students who speak a language other than English at home, ESL (English as a second language) programs are all too familiar. There is much conversation surrounding the benefits and drawbacks of ESL programs but, historically, the establishment of programs aiming to provide supplemental English resources to public school students has overturned students' equal opportunity for education. Specifically, the 1974 *Lau v. Nichols* case reinforced the ruling of the *Brown v. Board of Education* and placed Asian Americans at the forefront of education. This case occurred during a complex time: the Chinatown community was struggling to balance cultural and language preservation with the desegregation of schools and integration of Chinese students into majority-white schools. This paper examines the historical significance of the *Lau v. Nichols* case and its effects on English language programs and Asian American stereotypes.

Introduction

Lau v. Nichols began in San Francisco when Kinney Kinmon Lau's mother, Kam Wai Lau, sought legal advice about her landlord. During their conversation, Mrs. Lau mentioned that her son had trouble learning in class because of the all-English instruction. This caught the attention of Edward H. Steinman, who would proceed to represent the Laus in the case of *Lau v. Nichols*. In 1974, the Supreme Court ruled that the school violated section 601 of the Civil Rights Act of 1964, which required federally funded schools to provide supplemental English instruction to non-English speaking students in order to provide equal opportunity in public education.¹ This was a very complex case that raised questions about linguistic autonomy, desegregation in schools, and the advantages and disadvantages of bilingual education. The Lau family faced conflicting pressures from their lawyer and the Chinatown community, who favored segregation in schools to preserve their culture and language. Ultimately, Kinney Lau became too old to receive any benefits from the Court's decision, but the case resulted in something fruitful. Although there are arguments that ESL programs can "other" minority students and create divisions within the Asian American community, *Lau v. Nichols* set an important precedent that identified ESL education as a civil right and necessary for equitable education. This ruling would go on to help to highlight and overturn Asian American stereotypes through resulting programs for English Language Learner (ELL) students.

According to the US Department of Education, English Language Learners (ELL) refer to students of a national origin minority who have limited English proficiency.² In California, a student is labeled as an ELL if they list any language other than English on their Home Language

¹ Susan C. Bon, "Lau v. Nichols," Encyclopedia Britannica, January 14, 2023, <https://www.britannica.com/topic/Lau-v-Nichols>.

² "Developing Programs for English Language Learners: Glossary," U.S. Department Of Education, last modified January 16, 2020, <https://www2.ed.gov/about/offices/list/ocr/ell/glossary.html>.

Survey and indicate that they need English as a Second Language (ESL) programs or resources after an English proficiency assessment.³ ELL is often preferred over the term Limited English Proficient (LEP), which has a connotation of having a deficiency, and the term English Learner (EL), which erases the multilingual knowledge of the student.⁴ Therefore, throughout this paper I will be using the term ELL, which highlights students as learners of one of many languages and in this case, the English language.

Facts

Overview of Common Asian American Stereotypes

The perpetual foreigner stereotype delineates Asian Americans as “other” or alien, never belonging in America even if they were born in the country.⁵ In a survey from the Pew Research Center, about 32% of Asian Americans have been told by strangers to “go back to their country” in their day-to-day encounters with people, indicating the prevalence of the perpetual foreigner stereotype.⁶ Being perceived as a perpetual foreigner subsequently creates a feeling of not belonging to the country that they are residing in and feeling like an outsider to their homes.

The model minority myth represents Asian Americans as a group who possess positive traits that other minorities should model after: structured family values, quiet perseverance, and hard work.⁷ At first glance, the model minority myth seems very positive and may even be viewed as the opposite of the perpetual foreigner. However, it differentiates Asian Americans

³ “English Learners In California Schools,” California Department Of Education, accessed December 4, 2023, <https://www.cde.ca.gov/ds/sg/englishlearner.asp#:~:text=English%20Learner%20%E2%80%93%20A%20student%20who,indicates%20programs%20and%20services%20are>.

⁴ Ileana Najarro, “The Evolution of Terms Describing English Learners: An ELL Glossary,” Education Week, March 30, 2023, <https://advance.lexis-com.libproxy.berkeley.edu/api/document?collection=news&id=urn:contentItem:6852-M2T1-F09T-N181-00000-00&context=1516831>.

⁵ “Combatting the AAPI Perpetual Foreigner Stereotype,” New American Economy Research Fund, May 20, 2021, <https://research.newamericaneconomy.org/report/aapi-perpetual-foreigner-stereotype/>.

⁶ Neil G. Ruiz, Carolyne Im, and Ziyao Tian, “Asian Americans and the ‘forever foreigner’ stereotype,” Pew Research Center, November 30, 2023, <https://www.pewresearch.org/race-ethnicity/2023/11/30/asian-americans-and-the-forever-foreigner-stereotype/>.

⁷ Angelo N. Ancheta, *Race, Rights, and the Asian American Experience* (New Brunswick, N.J.: Rutgers University Press, 2006), 163, ProQuest.

above other communities of color and elevates them to a higher status in terms of social power. The dominant white group seeks to use this model minority myth to ignore complex histories of inequalities and discrimination, and to pit minority groups against each other to remain in power. The model minority myth undermines specific issues for the Asian American community within education. For example, the pressure of the model minority myth's academic expectation from peers, parents, and teachers can result in mental health distress like anxiety and low self-esteem in Asian American students.⁸ This perception that Asian American students do better in school can limit their access to educational support and help. Students may internalize this stereotype, which results in a lack of identification of their needs.⁹ Additionally, due to these expectations, teachers may also overlook the needs of Asian American students.

Racial Formation and the Creation and Enforcement of Stereotypes

When considering language in the Asian American community, it is also important to address how it correlates to racial formation and stereotypes. According to Omi and Winant, racial formation is “the sociohistorical process by which racial identities are created, lived out, transformed, and destroyed.”¹⁰ Because race impacts an individual's identity so widely, these stereotypical concepts place a heavy influence on their daily lives as well.¹¹ This process has been used to subordinate Asian American communities by labeling them with negative stereotypes—such as the perpetual foreigner, or a more positive but equally detrimental stereotype like the model minority. For example, speaking in a minority language or being an ELL in America can reinforce the stereotype of perpetual foreigner, which then expands to

⁸ Sulki Kim, “‘Cause you're Asian’: Influence of the Model Minority Stereotype as a Source of Social Comparison Affecting the Relationship between Academic Achievement and Psychological Adjustment among East Asian American High School Students,” (PhD diss., University of California, Los Angeles, 2007).

⁹ Stacey Lee et al. “The Model Minority Maze: Hmong Americans Working Within and Around Racial Discourses,” *Journal of Southeast Asian American Education and Advancement* 12, no. 2 (2017): doi: 10.7771/2153-8999.1153.

¹⁰ Michael Omi and Howard Winant, *Racial Formation In The United States* (New York: Routledge/Taylor & Francis Group, 2015), 109, ProQuest.

¹¹ Ancheta, *Race, Rights, and the Asian American Experience*, 45.

influence various aspects of their daily lives as well. One instance of this appears in the healthcare sector, where communities with lower English proficiency were found to have lower outcomes in terms of accessing and utilizing healthcare services.¹²

Language Minority: Immigrants and English Proficiency

According to the Pew Research Center, about 57% of Asian Americans were born outside of the country and only 53% of Asian American immigrants who have been in the US for five years say that they are proficient in English.¹³¹⁴ Moreover, over 80% of Asian Americans state that they speak a language other than English at home.¹⁵ This high percentage indicates that children of immigrants and immigrant children attending public schools will most likely need some type of ESL resource. Focusing specifically on data collected from California K-12 public schools from 2022 through 2023, 111,669 of all ELLs spoke an Asian language at home.¹⁶

Language & Education Policies and the Civil Rights Act

Lau v. Nichols reinforced *Brown v. Board of Education*'s ruling and stated that equal and meaningful educational opportunity should expand beyond providing all students with equal curriculum and facilities.¹⁷ The ruling of *Lau v. Nichols* emphasized that education should be equitable, meaning students with lower English proficiency should have additional resources to help them understand the material that is being taught, in addition to these equal facilities and

¹² Sylvia E. Twersky et al. "The Impact of Limited English Proficiency on Healthcare Access and Outcomes in the U.S.: A Scoping Review," *Healthcare* 12, no. 3 (2024): doi:10.3390/healthcare12030364.

¹³ Abby Budiman and Neil G. Ruiz, "Key facts about Asian Americans, a diverse and growing population," Pew Research Center, April 29, 2021, <https://www.pewresearch.org/short-reads/2021/04/29/key-facts-about-asian-americans/>.

¹⁴ Luis Noe-Bustamante, Lauren Mora, and Neil G. Ruiz, "In Their Own Words: Asian Immigrants' Experiences Navigating Language Barriers in the United States," Pew Research Center, December 19, 2022, URL: www.pewresearch.org/race-ethnicity/2022/12/19/in-their-own-words-asian-immigrants-experiences-navigating-language-barriers-in-the-united-states/.

¹⁵ Noe-Bustamante, Mora, and Ruiz, "In Their Own Words."

¹⁶ "English Learner Students by Language by Grade," California Department Of Education, accessed December 4, 2023, <https://dq.cde.ca.gov/dataquest/SpringData/StudentsByLanguage.aspx?Level=State&TheYear=2022-23&SubGroup=All&ShortYear=2223>.

¹⁷ Ibid.

curriculum. Additionally, the Supreme Court took the California Education Code § 8573 into consideration and cited an English proficiency level meeting the standards of the governing board as a state goal for students to receive their diplomas.¹⁸

Though there were bilingual programs before this case, *Lau v. Nichols* established that all students in public education had the legal right to receive English resources for their specific proficiency levels through a series of policy guidelines known as the Lau Remedies.¹⁹ The Lau Remedies recommended that students who predominantly spoke a language other than English be placed in some bilingual/multilingual or transitional bilingual program. Additionally, if these students possessed an intermediate level of English proficiency, the district had to provide data on their educational history. The district did not have to provide any additional programs if the student had been in the school system for less than a year and was achieving at or above their grade level. However, if the student had been in the school system for more than a year and was not meeting grade level requirements, the school was required to remedy the situation through various resources such as smaller class sizes, extra materials, or bilingual programs that did not conduct instruction in only their native language.²⁰

Despite California having some existing ELL programs before *Lau v. Nichols*, this case set a precedent for increasing ESL programs and access to resources for ELLs. In 1976, the California Legislature passed the Bilingual and Bicultural Education Act, which “explicitly declare[d] bilingual education as a right of English learners.”²¹ This was created in response to

¹⁸ “Developing Programs for English Language Learners: Lau v. Nichols,” U.S. Department Of Education, last modified January 16, 2020, <https://www2.ed.gov/about/offices/list/ocr/ell/lau.html>.

¹⁹ Baker, Keith, and Adriana A. De Kanter, *Bilingual Education: A Reappraisal of Federal Policy*. (Lexington, Mass: Lexington Books, 1983), 216-7.

²⁰ Ibid.

²¹ Hye-Jin Kim and Michael Winters, “Language Education Evolves in U.S., California,” San Francisco Public Press, January 25, 2017, <https://www.sfpublishpress.org/language-education-evolves-in-u-s-california/>.

the decision of *Lau* and directly expressed support for Asian American and other non-English speaking students.

The Civil Rights Act banned discrimination based on race and provided equal treatment to everyone regardless of race, but the *Lau* case emphasized equity over equality.²² The case made clear that equity was the core driver to enforcing equal educational opportunity as a right for public school students. Equal opportunity does not merely mean having equal physical resources, but also equitable access to resources that can help students flourish based on their specific backgrounds. In this case, ELL students have equal access to education because of programs that specifically focus on understanding their cultural and linguistic backgrounds. While the monolith stereotype of Asian Americans projects the community as same and equal, this provision recognizes the unique backgrounds of each student and reveals the diversity of the Asian American community. The impact of *Lau v. Nichols* on equitable ESL programs is clear today. During the 2020-2021 school year, over 98% of English Learners participated in an English Learner program.²³

Analysis

Counterargument: Linguistic Othering as the Perpetual Foreigner through ESL Programs

Some may argue that having a separate program that helps ELL students “catch up” to the states’ specified proficiency level brings worries about the segregation and alienation of ELL students. According to a study on Asian American perspectives about school by Shalini Shankar, professor of Anthropology and Asian American studies at Northwestern University, the experience of learning English in an ESL program and subsequently transitioning back to

²² “Civil Rights Act,” *Encyclopedia Britannica*, December 14, 2023, www.britannica.com/event/Civil-Rights-Act-United-States-1964.

²³ “Celebrating the 50th Anniversary of *Lau v. Nichols*,” Office of Public Affairs, February 5, 2024, <https://www.justice.gov/opa/blog/celebrating-50th-anniversary-lau-v-nichols>.

standard classes may bring up feelings of social stigmatization among students.²⁴ These feelings stem from being different from peers who do not have to attend ESL programs, thus resulting in a separation between the groups of ELL and non-ELL students. This can result in feelings of “otherness” as well, since many classes have a minority of students who are ELLs.

Using racial formation to analyze this, ESL programs may appear to support the perpetual foreigner myth by affirming the perceptions that Asian Americans who cannot speak English well are not Americans—not part of the majority group. Over half of the Asian American community are immigrants, and are most likely to be targeted as foreigners based on their limited levels of English and their accents.²⁵ Many Asian American students would be identified as ELL based on the high percentage of Asian Americans (over 80%) who speak another language at home and the Home Language Survey criteria. The Home Language Survey consists of questions that help identify the student’s language background and exposure. State and local education agencies then assess these answers to identify whether the student should be placed in the ESL program. From these statistics, many Asian Americans are subjected to being labeled as foreigners by other Americans, or made to feel that they do not belong due to their lower levels of English proficiency. This alienation can ultimately cause feelings of depression in these students.²⁶

Although some ELL students do reject these labels, they also push them onto others whom they believe fit the negatively connotated term, ‘perpetual foreigner. As a result, the cycle of linguistic discrimination continues.²⁷ This has detrimental effects on the students as it creates

²⁴ Shalini Shankar, “Asian American Youth Language Use: Perspectives Across Schools and Communities,” *Review of Research in Education* 35, no. 1 (2011): 21, doi: 10.3102/0091732X10383213.

²⁵ Rodriguez, Norma et al., “Development of the Multidimensional Acculturative Stress Inventory for adults of Mexican origin,” *Psychological Assessment* 14, no. 4 (2002): 451-61, <https://pubmed.ncbi.nlm.nih.gov/12501570/>.

²⁶ Su Yeong Kim, et al., “Accent, Perpetual Foreigner Stereotype, and Perceived Discrimination as Indirect Links between English Proficiency and Depressive Symptoms in Chinese American Adolescents,” *Developmental Psychology* 47, no. 1 (2011): 292, doi: 10.1037/a0020712.

²⁷ Kim, et al., “Accent, Perpetual Foreigner Stereotype,” 291.

this cycle of labeling their peers, who are newer ELLs, as foreigners. This also impacts relationships within the Asian American community through internalized racism, which can divide communities as they fight among themselves to be as far away from the bottom of the American racial hierarchy as possible.²⁸ This formation of race continues to create tensions not only among students' place in social belonging, but also the larger context in which Asian Americans fight to assimilate into society. With this division, it is harder to work toward social and political issues to combat discrimination and these stereotypes. However, ESL programs reveal that there are many ways in which its development and discussions can help combat this perpetual foreigner stereotype and the model minority myth.

Benefits of ESL and Bilingual Programs in Combating the Perpetual Foreigner Stereotype

Despite this idea that ESL programs reify the perpetual foreigner stereotype, there are still many benefits of ESL and bilingual programs. After the integration of Asian American students into American public schools, the Chinatown community advocated for the continual funding of afterschool programs focused on cultural and language classes in hopes of preserving their culture and promoting solidarity within the community.²⁹ They believed that representation required separate schools in which they could preserve their linguistic and cultural backgrounds in education. Bilingual and ESL programs help to provide a similar space of belonging to combat the erasure of culture that the community was worried about.

This phenomenon can be seen in the study “English Language Learners’ and Non-English Language Learners’ Perceptions of the Classroom Environment” by Courtney LeClair et al. that focused on the psychological influences of ESL programs by comparing the

²⁸ Wei-Chin Hwang, “Demystifying and Addressing Internalized Racism and Oppression Among Asian Americans,” *American Psychologist* 76, no. 4 (2021): 597, doi: 10.1037/amp0000798.

²⁹ Rachel Moran, “The Story of Lau v. Nichols: Breaking the Silence in Chinatown,” in *Education Law Stories*, eds. Michael A. Olivas and Ronna Greff Schneider (Minnesota: West Academic, 2008), 115-116.

perspectives of ELL and non-ELL students. The ELL students surveyed had positive experiences in school because their teachers implemented instructional practices that incorporated the students' culture and language into the lessons.³⁰ When ELL students perceived their culture and language being taught and accepted by their peers, they also perceived their school environment more positively. This was a general class where a majority of students were ELL, which indicates how the careful integrative curriculum of culture reinforces a sense of belonging for more students in the classroom. ESL curriculum and curriculum that focus on ELL students allow for a discussion and deeper understanding of more cultures and languages, allowing ELL students to feel comfortable. Implementing ESL programs into the general classroom could be a possible solution to mitigate the feelings of alienation by ELL students who have to be pulled out or isolated from the rest of their class. Moreover, through the theory of racial formation, this kind of collaboration in a group setting can help combat the perpetual foreigner stereotype as non-ELL students in these classes learn about different cultures and alter their perceptions according to the new information that they have obtained. Because the social construction of race is always evolving, implementing a culturally diverse curriculum based on ELL students and ESL ideas can help destroy this perception of race that places Asian Americans as perpetual foreigners. Focusing on creating a community among ELL students can help prevent any animosity or alienation that might arise within the community.

It was previously noted that having “separate” ESL programs might stigmatize ELL students as different, but there are more harmful effects when these differences are overlooked or ignored. According to Ancheta, “commitments to racial and ethnic assimilation pose the greatest challenges to the legal accommodation of difference.”³¹ Without ESL programs that

³⁰ Courtney LeClair, et al., “English Language Learners’ and Non-English Language Learners’ Perceptions of the Classroom Environment,” *Psychology In The Schools* 46, no. 6 (2009): 574, doi.org/10.1002/pits.20398.

³¹ Ancheta, *Race, Rights, and the Asian American Experience*, 107.

acknowledge the difference in English proficiency among students, ELL students would not be able to receive the meaningful education that the Court cited as their educational right. Equity requires education systems to acknowledge these differences, and is needed to promote equal educational opportunity. In California, the amount of ELL students that graduated within four years of high school was behind by 17.7% compared to their non-ELL counterparts.³² To bridge this difference in graduation rate, educators and policy-makers must identify ELL students and the improvements that can be made to better support their academic careers. So, when instructing both ELL and non-ELL students in the same classroom, instructors must ensure that they are not giving the same resources to both groups. Like the study in the previous paragraph, instructors should seek to incorporate ELL students' cultures and language into the curriculum and note that they might need additional or different resources than their non-ELL peers.

Although the perpetual foreigner stereotype is rooted in identifying differences and othering individuals based on them, it is also necessary to address these differences and unique issues such as immigration status, age, and generational gaps. According to Jose Llanes, bilingual education is essential in ensuring that immigrant groups do not “degenerate into segments of monolingual native language speakers and monolingual adoptive language speakers within a generation.”³³ This paper focuses mainly on public education from K-12, but it is also important to consider bilingualism in newly immigrated adults, who may seek out ESL education through community colleges regarded as public postsecondary institutions. To progress politically in society and to strengthen intergenerational relationships, communication between generations of a community needs to be clear. Language and culture are intertwined, and both are essential to community building. ESL programs can help grandparents, parents, and newly

³² “English Learners In California Schools.”

³³ Jose Llanes, “The Sociology Of Bilingual Education In The United States,” *The Journal Of Education* 163, no. 1 (1981): 76, doi.org/10.1177/0022057481163001.

immigrated adults communicate in English with the American-born generation who may not be fluent in their native languages. Furthermore, language barriers not only limit communication between individuals who do not share a common language, but they also prevent individuals from accessing public services, like in healthcare or judicial sectors.³⁴ Only 53% of Asian immigrants identify that they can speak English proficiently, which is only a little more than half of the community. Bilingual programs must exist and remain accessible for communities to seek out healthcare and employment services with fewer limitations.

Using ESL Programs to Combat the Model Minority Myth

Viewing Asian Americans as the model minority is an act of oppression that pressures Asian Americans to assimilate and internalize what are accepted as white traits such as being diligent, educated, and law-abiding citizens.³⁵ They are pushed into a box to assimilate into white society and fit into “more acceptable” images of themselves. In this way, the model minority becomes intertwined with their ethnic identity and perception of self. This pressure creates detrimental effects on their self-concept and mental health that can lead to depressive symptoms.³⁶ To overcome this pressure, Asian Americans must preserve a part of their cultural and ethnic identity that allows them to hold a secure identity that they define for themselves. Because ESL programs allow students to better understand the differences between their native language and English, it can also help students develop a stronger ethnic self-identity.

Edward H. Steinman, the lawyer representing the Laus in the *Lau v. Nichols* case, chose to prioritize the Chinese American community among non-English speakers to mitigate the limitations of the model minority myth.³⁷ Asian American students have achieved success in

³⁴ Ancheta, *Race, Rights, and the Asian American Experience*, 108.

³⁵ Kristy Y. Shih, Tzu-Fen Chang, and Szu-Yu Chen, “The Impacts of the Model Minority Myth on Asian American Individuals and Families: Social Justice and Critical Race Feminist Perspectives,” *Journal Of Family Theory & Review* 11, no. 3 (2019): 415, doi.org/10.1111/jftr.12342.

³⁶ Shih, Chang, and Chen, “The Impacts of the Model Minority Myth on Asian American Individuals and Families.”

³⁷ Moran, “The Story of *Lau v. Nichols*,” 118.

academics without the benefits of affirmative action, so Steinman believed that the courts would be more sympathetic to their story. Despite the perception that Asian American students were the model minority, they still needed assistance in academics. Steinman even revealed that the school board did virtually nothing for these students since they did not conduct accurate language placement tests, and the existing bilingual programs had a majority of teachers who spoke only English.³⁸

This case was also a step towards undoing the dehumanizing effects of the model minority myth on Asian Americans. Due to the model minority myth, Asian American students were portrayed as “champion entrepreneurs and collegiate whiz kids.”³⁹ Under this stereotype, they were only viewed as academic robots, almost like they could not be imperfect. In reality, however, they were not all excelling in school, and needed additional tools to help them understand English. The case broke down these labels of “whiz kid” and “champion entrepreneurs” to reveal that some Asian Americans were struggling in academics. They were humans who did not have to live up to the perfect expectations of the model minority myth. By focusing on Chinese students within language programs that once heavily catered to Spanish-speaking students, the case redefined an equal right to education by showcasing the need to provide equitable resources for ELL students in Asian American communities. Even though they have had patterns of academic achievement without the benefits of affirmative action, Asian Americans should not be overlooked in the education system.⁴⁰ *Lau v. Nichols* illustrates the need for student aid in the face of all-English instruction and a lack of English proficiency.

³⁸ Ibid.

³⁹ Frank H. Wu and Theodore Hsien Wang, “Beyond the Model Minority Myth: Why Asian Americans Support Affirmative Action,” *Guild Practitioner* (1996): 35. URL: http://repository.uchastings.edu/faculty_scholarship/850.

⁴⁰ Ancheta, *Race, Rights, and the Asian American Experience*, 163.

The development of better ESL programs can help highlight the diversity among Asian Americans who have different experiences and, therefore, needs for specific resources. The US Census recognizes 23 Asian languages spoken in the US.⁴¹ When establishing bilingual programs, educators find that there is not enough understanding of the needs of children who come from these Asian language backgrounds, especially oral languages like the Hmong language.⁴² By understanding and researching the native languages of ELL students, educators can find specific worksheets, audio tapes, or hands-on activities that connect to the students' culture to create a conducive learning environment for them. Similar to bilingual programs' unique treatment of ELL students based on their diverse backgrounds, society can also view Asian Americans as a heterogeneous group of individuals from various ethnic and cultural backgrounds instead of a singular model minority group. ESL programs help jumpstart more educational assessments and provide better research and information to schools and educators to challenge this monolithic view of Asian Americans.

Conclusion

The *Lau v. Nichols* case and its effects on English language programs aim to support and provide an equal education system that dismantles Asian American stereotypes such as the perpetual foreigner and model minority myths. ESL programs promote diversity and inclusion rather than discrimination. The Asian American community, composed of newly immigrated and native-born individuals with backgrounds from all over the Asia continent, is extremely diverse and cannot be tied to one singular narrative or stereotype. Assuming every Asian person is a foreigner, a great student, or the same as the other Asian person, erases the illuminating beauty of

⁴¹ Lindsay M. Monte and Hyon B. Shin, "20.6 Million People in the U.S. Identify as Asian, Native Hawaiian or Pacific Islander," U.S. Census Bureau, May 25, 2022, URL: [census.gov/library/stories/2022/05/aanhpi-population-diverse-geographically-dispersed.html](https://www.census.gov/library/stories/2022/05/aanhpi-population-diverse-geographically-dispersed.html).

⁴² A. Lin Goodwin, "Curriculum as Colonizer: (Asian) American Education in the Current U.S. Context," *Teachers College Record* 112, no. 12 (2010), doi.org/10.1177/016146811011201201.

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their unique stories and experiences as an individual. ESL and bilingual programs can help spur the discussion to better include individual students' culture and language in the classroom and society.

Bibliography

- Ancheta, Angelo N. *Race, Rights, and the Asian American Experience*. New Jersey: Rutgers University Press, 2006. ProQuest.
- Baker, Keith, and Adriana A. De Kanter. *Bilingual Education: A Reappraisal of Federal Policy*. Lexington, Mass: Lexington Books, 1983.
- Bon, Susan C. "Lau v. Nichols." *Encyclopedia Britannica*. January 14, 2023.
<https://www.britannica.com/topic/Lau-v-Nichols>.
- Budiman, Abby and Neil G. Ruiz, "Key facts about Asian Americans, a diverse and growing population." Pew Research Center. April 29, 2021.
<https://www.pewresearch.org/short-reads/2021/04/29/key-facts-about-asian-americans/>.
- "Celebrating the 50th Anniversary of Lau v. Nichols." Office of Public Affairs. February 5, 2024. <https://www.justice.gov/opa/blog/celebrating-50th-anniversary-lau-v-nichols>.
- "Civil Rights Act." *Encyclopedia Britannica*. December 14, 2023.
www.britannica.com/event/Civil-Rights-Act-United-States-1964.
- "Combatting the AAPI Perpetual Foreigner Stereotype." New American Economy Research Fund. May 20, 2021.
<https://research.newamericaneconomy.org/report/aapi-perpetual-foreigner-stereotype/>.
- "Developing Programs for English Language Learners: Glossary." U.S. Department Of Education. Last modified January 16, 2020.
<https://www2.ed.gov/about/offices/list/ocr/ell/glossary.html>.
- "Developing Programs for English Language Learners: Lau v. Nichols." U.S. Department Of Education. Last modified January 16, 2020.
<https://www2.ed.gov/about/offices/list/ocr/ell/lau.html>.
- "English Learner Students by Language by Grade." California Department Of Education. Accessed December 4, 2023.
<https://dq.cde.ca.gov/dataquest/SpringData/StudentsByLanguage.aspx?Level=State&TheYear=2022-23&SubGroup=All&ShortYear=2223>.
- "English Learners In California Schools." California Department Of Education. Accessed December 4, 2023.

<https://www.cde.ca.gov/ds/sg/englishlearner.asp#:~:text=English%20Learner%20%E2%80%93%20A%20student%20who,indicates%20programs%20and%20services%20are>.

Goodwin, A. Lin. "Curriculum as Colonizer: (Asian) American Education in the Current U.S. Context." *Teachers College Record* 112, no. 12 (2010).
doi.org/10.1177/016146811011201201.

Hwang, Wei-Chin. "Demystifying and Addressing Internalized Racism and Oppression Among Asian Americans." *American Psychologist* 76, no. 4 (2021): 596-610.
doi: 10.1037/amp0000798.

Kim, Hye-Jin, and Michael Winters. "Language Education Evolves in U.S., California." San Francisco Public Press. January 25, 2017.
<https://www.sfpublishpress.org/language-education-evolves-in-u-s-california/>.

Kim, Sulki. "'Cause you're Asian': Influence of the Model Minority Stereotype as a Source of Social Comparison Affecting the Relationship between Academic Achievement and Psychological Adjustment among East Asian American High School Students." PhD diss. University of California, Los Angeles, 2007.

Kim, Su Yeong, Yijie Wang, Shiyong Deng, Rocio Alvarez, and Jing Li. "Accent, Perpetual Foreigner Stereotype, and Perceived Discrimination as Indirect Links between English Proficiency and Depressive Symptoms in Chinese American Adolescents." *Developmental Psychology* 47, no. 1 (2011): 289-301. doi: 10.1037/a0020712.

LeClair, Courtney, Beth Doll, Allison Osborn, and Kristin Jones. "English Language Learners' and Non-English Language Learners' Perceptions of the Classroom Environment." *Psychology In The Schools* 46, no. 6 (2009): 568-577. doi.org/10.1002/pits.20398.

Lee, Stacey, Choua Xiong, Linda Marie Pheng, and Mai Neng Vang. "The Model Minority Maze: Hmong Americans Working Within and Around Racial Discourses," *Journal of Southeast Asian American Education and Advancement* 12, no. 2 (2017):
doi: 10.7771/2153-8999.1153.

Llanes, Jose. "The Sociology Of Bilingual Education In The United States." *The Journal Of Education* 163, no. 1 (1981): 70-82. doi.org/10.1177/0022057481163001.

Balancing Tongues: ESL Programs in Combating Asian American Stereotypes

- Monte, Lindsay M., and Hyon B. Shin. "20.6 Million People in the U.S. Identify as Asian, Native Hawaiian or Pacific Islander." U.S. Census Bureau. May 25, 2022. census.gov/library/stories/2022/05/aanhpi-population-diverse-geographically-dispersed.html.
- Moran, Rachel. "The Story of Lau v. Nichols: Breaking the Silence in Chinatown." In *Education Law Stories*, edited by Michael A. Olivas and Ronna Greff Schneider, 111-157. Minnesota: West Academic, 2008.
- Najarro, Ileana. "The Evolution of Terms Describing English Learners: An ELL Glossary." Education Week. March 30, 2023. [https://advance-lexis-com.libproxy.berkeley.edu/api/document?collection=news&id=urn:contentItem:6852-M2T1-F09T-N181-00000-00&context=1516831](https://advance.lexis-com.libproxy.berkeley.edu/api/document?collection=news&id=urn:contentItem:6852-M2T1-F09T-N181-00000-00&context=1516831).
- Noe-Bustamante, Luis, Lauren Mora, and Neil G. Ruiz. "In Their Own Words: Asian Immigrants' Experiences Navigating Language Barriers in the United States." Pew Research Center. December 19, 2022. www.pewresearch.org/race-ethnicity/2022/12/19/in-their-own-words-asian-immigrants-experiences-navigating-language-barriers-in-the-united-states/.
- Omi, Michael, and Howard Winant. *Racial Formation In The United States*. New York: Routledge/Taylor & Francis Group, 2015. ProQuest.
- Rodriguez, Norma, Hector F Myers, Consuelo Bingham Mira, Thomas Flores, and Loretta Garcia-Hernandez. "Development of the Multidimensional Acculturative Stress Inventory for adults of Mexican origin." *Psychological Assessment* vol. 14,4 (2002): 451-61.
- Ruiz, Neil G., Carlyne Im, and Ziyao Tian. "Asian Americans and the 'forever foreigner' stereotype." Pew Research Center. November 30, 2023. <https://www.pewresearch.org/race-ethnicity/2023/11/30/asian-americans-and-the-forever-foreigner-stereotype/>.
- Shankar, Shalini. "Asian American Youth Language Use: Perspectives Across Schools and Communities." *Review of Research in Education* 35, no. 1 (2011): 1-28. doi: 10.3102/0091732X10383213.
- Shih, Kristy Y., Tzu-Fen Chang, and Szu-Yu Chen. "The Impacts of the Model Minority Myth on Asian American Individuals and Families: Social Justice and Critical Race Feminist Perspectives." *Journal Of Family Theory & Review* 11, no. 3 (2019): 412-428.

doi.org/10.1111/jfr.12342.

Twersky, Sylvia E., Rebeca Jefferson, Lisbet Garcia-Ortiz, Erin Williams, and Carol Pina. "The Impact of Limited English Proficiency on Healthcare Access and Outcomes in the U.S.: A Scoping Review." *Healthcare* 12, no. 3 (2024): doi:10.3390/healthcare12030364.

Wu, Frank H., and Theodore Hsien Wang. "Beyond the Model Minority Myth: Why Asian Americans Support Affirmative Action." *Guild Practitioner* 53 (1996): 35-36.
http://repository.uchastings.edu/faculty_scholarship/850.