

**Sole Source
Written Determination**

Agency Identification: Department of Education H630

Description of the agency need that this procurement fulfills: *(See instructions on last page for guidance)*

The Office of Career Readiness (OCR) is responsible for providing high-quality instruction and support services through its WIOA-supported Adult Education programs, which serve a diverse population of adult learners across the state. These programs are designed to help individuals improve their English language proficiency, attain high school equivalency, transition to postsecondary education or training, and enter or advance in the workforce.

To fulfill its mission and meet federal and state accountability requirements, the agency must equip programs with the training and resources to:

- Provide standards-aligned instruction that supports measurable progress in English language acquisition.
- Offer flexible, accessible learning environments that accommodate multilevel classrooms and remote learners.
- Deliver instructional tools and resources that support pronunciation, listening, reading, writing, and digital literacy.
- Ensure data tracking and reporting capabilities that align with National Reporting System (NRS) requirements.
- Support Integrated English Literacy and Civics Education (IELCE) and Integrated Education and Training (IET) models with career-focused content and instructional planning.

To this end, one of the OCR's core responsibilities is to equip ELLs with the language and literacy skills necessary to succeed in education, employment, and community life. This requires a comprehensive instructional solution that addresses the unique challenges faced by adult English learners and supports educators in delivering effective, equitable instruction.

Describe the Market Based on Research Performed: *(See instructions on last page for guidance)*

As part of a strategic review to support procurement decisions for English Language Learning (ELL) instructional software, a comparative analysis was conducted on three widely used platforms for adult learners: BurlingtonEnglish, Rosetta Stone (by IXL), and EnGen (Voxy). The evaluation focused on key criteria relevant to Title II/WIOA-funded adult education programs, including standards alignment, instructional flexibility, digital literacy integration, workforce readiness, and compliance reporting.

Each platform offers distinct strengths. EnGen (Voxy) also presents notable strengths. It delivers targeted ESL instruction for specific industries, including healthcare and hospitality. The platform incorporates adaptive AI-driven feedback for pronunciation and speaking practice. EnGen supports remote learning and is optimized for mobile access and low-bandwidth environments. It includes multilingual navigation features and offers

**Sole Source
Written Determination**

live onboarding support for staff.

BurlingtonEnglish provides a comprehensive instructional framework that aligns with national and state adult education standards such as CCRS, and EL Civics. It includes extensive workforce-targeted content, such as Career Pathways and Workplace English courses tailored to specific industries. The platform supports blended learning and teacher-led instruction through a full suite of lesson planning tools, assessments, and classroom activities. BurlingtonEnglish also features dedicated digital literacy modules, robust pronunciation training via its patented SpeechTrainer™, and scaffolded support for literacy-level and multilevel learners. It is optimized for mobile and low-bandwidth environments, includes multilingual navigation, and offers detailed tracking and reporting capabilities for compliance. Implementation support is extensive, with live training and ongoing professional development.

Rosetta Stone (by IXL) is recognized for its user-friendly interface and suitability for self-paced learning. It includes basic speech recognition tools and is compatible with mobile devices and low-bandwidth environments. For learners seeking independent study options, Rosetta Stone offers a flexible and accessible experience.

Despite these strengths, both EnGen and Rosetta Stone present limitations that impact their suitability for structured adult education programs. Rosetta Stone lacks alignment with CCRS, and EL Civics, making it incompatible with WIOA-funded instructional standards. It offers minimal workforce content and does not support IELCE or IET instructional models. The platform provides very limited instructional integration tools and lacks support for literacy-level learners and multilevel classrooms. It does not include digital literacy modules and offers no reporting tools for compliance tracking.

EnGen, while more aligned with adult education goals, still falls short in several areas. Its standards alignment is broad but not fully standardized, which may pose challenges for programs requiring strict compliance. Support for literacy-level learners is limited, and instructional tools for teacher integration are moderate in scope. Reporting capabilities are basic, and digital literacy is embedded contextually rather than offered through dedicated modules.

In summary, while all three platforms offer valuable features, BurlingtonEnglish is the only solution that fully meets the instructional, compliance, and operational needs of Title II/WIOA-funded adult education programs. Transitioning away from BurlingtonEnglish would require a comparable implementation timeline of approximately 18 to 24 months, based on prior rollout experience. This process would involve system configuration, instructor onboarding, curriculum alignment, and data integration. Given that over 75% of instructors are part-time and already managing substantial workloads, a transition would introduce significant stress and disruption. It would also risk undoing the progress made in

**Sole Source
Written Determination**

digital literacy and workforce preparation, and delay compliance readiness. Instructor feedback further reinforces these concerns, with many expressing that the current system supports their teaching goals and that switching platforms would mean starting over and losing valuable momentum.

Sole Source Vendor Name: Burlington English Inc.

Based upon the following determination, Agency proposes to acquire the supplies, construction, information technology, and/or services described herein from the vendor named above per SC Code Ann § 11-35-1560 and SC Regulation 19-445.2105, Sole Source Procurement.

Description of supplies, construction, information technology, and/or services vendor will provide under the contract: *(See instructions on last page for guidance.)*

Under this contract, Burlington English Inc. will provide access to its proprietary BurlingtonEnglish® digital learning platform, designed specifically for adult English Language Learners (ELLs) in WIOA-funded education programs. The platform includes:

- A comprehensive six-level core curriculum aligned with CCRS, and EL Civics standards.
- Workforce preparation courses that support Integrated Education and Training (IET) and Integrated English Literacy and Civics Education (IELCE) models.
- The SpeechTrainer®, a patented speech recognition and pronunciation training tool that provides personalized feedback to learners.
- A fully blended learning environment, allowing for both teacher-led instruction and independent student access to online lessons.
- Digital literacy modules, a robust digital reading library, and supplemental grammar resources.
- Multilingual navigation and support, enabling accessibility for learners with limited English proficiency.
- Tracking and reporting tools that support proxy hour documentation and National Reporting System (NRS) compliance.
- In-Class Lessons for teacher-guided instruction, designed to complement the online curriculum.
- Implementation support and professional development, including onboarding, live training sessions, and ongoing instructional support provided directly by BurlingtonEnglish staff.

This solution will be delivered as a cloud-based service, accessible immediately upon account setup, and supported by Burlington English Inc.'s dedicated implementation and training team.

Explain why the described solution is the only solution that meets the agency's need and how no other identified solutions were sufficient. *(See instructions on last page for guidance)*

**Sole Source
Written Determination**

The agency has determined that BurlingtonEnglish is the only solution that meets the specific instructional and operational needs of our WIOA-funded Adult Education programs, particularly in serving English Language Learners (ELLs). This determination is based on extensive market research and a thorough evaluation of available products in the ESL instructional technology space.

While other vendors such as Rosetta Stone (by IXL) and EnGen (by Voxy) offer language learning platforms, they do not meet the full scope of requirements necessary for our program. These include alignment with CCRS, and EL Civics standards; support for literacy-level learners; integrated digital literacy instruction; multilevel classroom flexibility; and robust tracking and reporting tools for NRS compliance. Additionally, most alternative platforms are designed for general consumer use and lack the instructional depth, customization, and educator support required for federally funded adult education programs.

BurlingtonEnglish has been our selected curriculum provider for the past three years. During this time, we have launched a statewide training and implementation initiative to ensure both instructors and students are fully equipped to maximize the platform's potential. This initiative has involved substantial investments of time, funding, and human capital, resulting in measurable improvements in instructional quality and learner outcomes—particularly among low-level English language learners.

Transitioning to a new curriculum at this stage would disrupt the progress we've made and result in the loss of prior investments. Retraining staff on a different platform would incur significant costs and time, without assurance that alternative products would meet our specific instructional needs. BurlingtonEnglish's proven effectiveness, particularly for literacy-level learners, and its alignment with our instructional goals make it the only viable solution.

The product will be obtained directly from Burlington English Inc., the sole manufacturer and authorized provider of BurlingtonEnglish® in the United States. The vendor also provides direct implementation support, professional development, and ongoing technical assistance, which are critical to maintaining program continuity and instructional fidelity.

For these reasons, the agency respectfully requests approval of Burlington English Inc. as a sole source vendor to preserve the continuity, effectiveness, and compliance of our current program.

**Sole Source
Written Determination**

Note: Determination is not complete without required signatures and dates

Required Signatures:

Prepared by: Nelecia Murrell

Date: 10/07/2025

Printed Name: Nelecia Murrell

Title: Enter Title of Preparer

Approved by: Ellen E. Weaver

Approval Date: 10/21/25

Printed Name: Ellen E. Weaver

Title: State Superintendent of Education

The last page contains instructions and is not required to be retained.