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RE: Public Comment: 22 PA Code Ch. 49 Certification of Professional Personnel

The Pennsylvania Branch of the International Dyslexia Association appreciates the opportunity to provide public comment on Chapter 49- Certification of Professional Personnel (Final Regulation 6-346).

The Pennsylvania Branch of the International Dyslexia Association (PBIDA) is committed to bringing structured literacy methods to scale in classrooms throughout the state. Structured literacy is a critical component of the science of reading that promotes the explicit, systematic instructional practices that ensure all students become proficient readers ([link to reference](#)).

PBIDA fully supports the revisions to Chapter 49 stipulating that pre-service teacher candidates (Early Childhood, Elementary/Middle, Special Education Pre-K-12, English as a Second Language, Reading Specialist) and in-service teachers receive training in structured literacy. We support the definition of structured literacy utilized in the regulation, which is consistent with the definition established by the International Dyslexia Association; however, we are compelled to point out an **error in terminology**. The term “systemic” is used rather than the term “systematic” in the definition provided in the Chapter 49 final regulation:

“Structured literacy- **Systemic**, explicit instruction that provides a strong core of foundational skills in the language systems of English...” (49.1 Definitions).

The definition should read: “Structured literacy- **Systematic**, explicit instruction...”<sup>1</sup> This error in terminology should be corrected throughout the document.

The term **systematic** is used to reflect the logical, sequential progression of skills taught explicitly in structured literacy, and is the term used in the definition established by the International Dyslexia Association. The terminology used in Chapter 49 should be precise and reflect established, researched based terminology from the extant literature.

The International Dyslexia Association has developed the Knowledge and Practice Standards for Teachers of Reading (KPSTR) to guide teacher preparation in structured literacy at the pre service and in-service level ([link here](#)). The KPSTR are a comprehensive, research-based resource that offers specific guidelines for preparing all teachers of reading with the expert knowledge and skills they need to effectively implement structured literacy in the classroom for all learners. PBIDA strongly recommends that program framework guidelines and implementation standards developed for the Chapter 49 final regulation be aligned with the KPSTR to ensure fidelity with scientifically based practices. Further, the resulting new competencies established for certification exams should be assessed and reported separately from other English Language Arts competencies to ensure that certified teachers are able to demonstrate

<sup>1</sup>proficiency in structured literacy methods. It is critical that all teachers who are responsible for teaching students to read have the skills they need to provide the research based instructional practices most children need to learn how to read.

PBIDA supports the Department's plan to scale up training in structured literacy for higher education faculty and in-service teachers through the Pennsylvania Training and Technical Assistance Network. We further support hiring a dedicated structured literacy state lead and strongly recommend that offerings include training for literacy coaches who can provide close support to teachers and districts as they incorporate structured literacy methods into their curricula. For some schools, structured literacy methods will represent a significant change to their current practices, and will require ongoing learning and support to develop and sustain effective structured literacy practices. This will necessarily involve decision making (e.g., writing new curricula, purchasing high quality materials, scheduling, providing time for teacher collaboration etc.) at the building and central administrative levels. As such, training for principals and other relevant administrative leaders will also be important to ensure that districts have the tools to implement structured literacy effectively.

Finally, PBIDA recognizes that effective reading instruction must occur in the context of Culturally Relevant and Sustaining Educational practices that meet the needs of our diverse student population. We fully support the proposed CR-SE definition and requirements to incorporate CR-SE training into pre-service curricula, field experiences, induction plans, and continuing professional education plans. PBIDA believes that CR-SE pedagogy will not only help to address the achievement and opportunity gaps in our state, they will help promote a more diverse teacher work force in Pennsylvania by improving retention rates of teachers of color. This is fully consistent with the Department's stated goal of increasing equity and access to quality teaching for students who attend Title I schools.

In summary, requiring teacher preparation in structured literacy is an important step in addressing the reading crisis in our state. The degree to which these regulatory changes will result in improved reading outcomes in Pennsylvania will largely depend on the extent to which teacher candidates receive training from knowledgeable faculty, ongoing opportunities for professional learning, and support from knowledgeable administrators. CR-SE provides a context for reading instruction that respects and leverages the diverse experiences students come to school with and supports a more diverse teacher work force. PBIDA makes the following suggestions for the final Chapter 49 regulations and the resulting program framework guidelines and updated certification exams:

- Change the term “systemic” to “systematic” in the structured literacy definition.
- Align new framework guidelines and implementation standards to the KPSTR.
- Assess and separately report new structured literacy competencies on updated certification exams.
- Include training for coaches and administrators in structured literacy offerings from PATTAN.

Respectfully Submitted on Behalf of the PBIDA Board of Directors,

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<sup>1</sup> International Dyslexia Association (2018). Knowledge and practice standards for teachers of reading. Baltimore, MD: International Dyslexia Association. Retrieved from <https://dyslexiaida.org/knowledge-and-practices/>