

Wednesday, February 23, 2022

Pennsylvania State Board of Education
Pennsylvania Independent Regulatory Review Commission
Harrisburg, Pennsylvania



Dear State Board of Education and Independent Regulatory Review Commission Members,

Teach Plus is pleased to provide comment on the final form amendments to Chapter 49. Teach Plus is a national non-profit organization whose mission is to empower excellent, experienced, and diverse teachers to take leadership over key policy and practice issues that advance equity, opportunity, and student success. We work with nearly 400 PK-16 educators across Pennsylvania through our teaching policy fellowship, instructional leadership programs, and statewide teacher network.

Teach Plus strongly supports the inclusion of the definition of culturally relevant and sustaining education (CR-SE) and requirements for educator preparation programs and local education agencies to incorporate CR-SE training for teachers into their pre-service curricula and field experiences, induction plans, and continuing professional education plans. Research suggests that CR-SE techniques produce better outcomes for students, especially students of color. Teach Plus has published two research reports, [*If You Listen, We Will Stay: Why Teachers of Color Leave and How to Disrupt Teacher Turnover*](#) and [*To Be Who We Are: Black Teachers on Creating Affirming School Cultures*](#), on conditions that will improve retention of teachers of color; in both studies, the need for culturally responsive pedagogy and curricula were identified as prerequisites for higher retention of teachers of color. Given Pennsylvania's longstanding racial opportunity and achievement gaps, the increasing racial diversity of Pennsylvania's student population, and the extreme shortage of teachers of color in Pennsylvania, CR-SE is an urgent priority. CR-SE training is a top priority for our teachers, particularly our teachers of color and our Culturally Affirming Schools working group within our policy fellowship. We further urge the State Board of Education and Pennsylvania Department of Education to act urgently to finalize the CR-SE competencies and implementation guidelines for institutions, as well as to incorporate CR-SE into Chapter 354, so that teachers of all races begin to develop as culturally relevant and sustaining educators as quickly as possible.

Second, Teach Plus also strongly supports the inclusion of structured literacy in the final form amendments. As a member of the Read by 4th campaign in Philadelphia and a partner of the School District of Philadelphia, we have long supported the science of reading and advocated for curricula and teacher training to be aligned with the science of reading. The definition of structured literacy provided in Chapter 49 aligns with the principles of the science of reading, which is a research-based and comprehensive approach to teaching reading that includes but is not limited to systematic, explicit phonics instruction. We have seen firsthand through our work with teachers in Philadelphia that such an approach is effective with students. Additionally, promising results from Bethlehem, PA, as well as in Mississippi and other states that have embraced the science of reading, suggest that shifting from balanced literacy to the science of reading could have profound effects on our children's achievement and a broad range of life outcomes. We believe that incorporating training in structured literacy into pre-service and in-service teacher training will also help to reduce racial and socioeconomic achievement gaps in the Commonwealth. We would like to note, however, a typo in the current definition of structured literacy in the regulation: the word "systemic" should be "systematic." We further urge the Board and

Department to partner with organizations in Pennsylvania that have already developed expertise in the science of reading as competencies and implementation guidelines are developed; such organizations include the Pennsylvania Branch of the International Dyslexia Association, the AIM Institute for Learning and Research, and the Read by 4th coalition in Philadelphia.

We stand ready to partner with the State Board of Education and the Department of Education to implement these new regulations thoughtfully, effectively, and with all deliberate speed.

Sincerely,

A handwritten signature in black ink that reads "L Boyce". The signature is written in a cursive style with a large initial "L" and "B".

Laura Boyce
Pennsylvania Executive Director
Teach Plus
www.teachplus.org