



The Literacy Alliance of Pennsylvania

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**Independent Regulatory  
Review Commission**

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

First, I would like to say The Literacy Alliance of Pennsylvania appreciates the opportunity to provide public comment on this matter.

The Literacy Alliance of Pennsylvania believes in the transformative power of literacy and seeks to transform the lives of Pennsylvanians through the power of literacy. Structured literacy is the foundation of quality literacy instruction in Pennsylvania. Structured literacy promotes the explicit, SYSTEMATIC, and sequential instructional practices that are life-saving to our struggling readers, beneficial to all readers and harmful to none.

The Literacy Alliance of Pennsylvania (TLA of PA) is dedicated to bringing about systemic change that benefits all students and fully supports the revisions to Chapter 49 stipulating that pre-service teacher candidates and in-service teachers receive training in structured literacy. We support the definition of structured literacy utilized in the regulation as it is consistent with the definition established by the International Dyslexia Association. We concur with prior public comment which has pointed out the error in terminology and request that the word "systemic" be replaced with the proper terminology "Systematic".

TLA of PA supports the Departments plan to provide training for higher education faculty and in-service teachers through the Pennsylvania Training and Technical Assistance Network. We also support the development of a dedicated structured literacy state lead position and would like to see a training program developed for structured literacy coaches, who can provide more individualized support and training to our 500 localized school districts and our nearly 120,000 teachers. We believe this training protocol must employ a top-down approach which will require all principals, special education directors, curriculum directors, and other relevant administrators to have the knowledge, training, and tools to implement structured literacy effectively and to support their staff as they implement structured literacy in the classroom.

There is no question 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 incorporation of CR-SE training into pre-service curricula, field experiences, induction and continuing education requirements. This is a crucial step forward in addressing the achievement and opportunity gaps in our state.

TLA of PA applauds the work put in to strengthen Ch.49 regulations and believes that these changes are building blocks to redesigning effective literacy practices in Pennsylvania.

Your partner in Literacy,

Jessica McKee MSW, LSW  
The Literacy Alliance of Pennsylvania.

Dr. Jill Craven