



Karen Molchanow
Executive Director,
State Board of Education
333 Market Street, 1st floor
Harrisburg, PA 17126
Ra-stateboardofed@pa.gov

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

The Literacy Coalition appreciates the opportunity to provide comment on the proposed Chapter 49 changes published in the PA Bulletin on December 19, 2020.

Section 49.1 – Definitions, we suggest the following additions (underlined below) to be added to the definition of *structured literacy*:

Structured Literacy is based on The Science of Reading (SOR) which combines several disciplines for understanding of what processes are involved in reading, recognizing the importance of language and reading comprehension with systemic, explicit instruction that integrates listening, speaking, reading, spelling, and writing and emphasizes the structure of language across the speech sound system (phonology), the writing system (orthography), the structure of sentences (syntax), the meaningful parts of words (morphology), the relationships among words (semantics), and the organization of spoken and written discourse.

Section 49.13(4)(ii)

We suggest *structured literacy* should be included in the list of programs to be evaluated by the Department

Section 49.13(4)(ii) requires instruction in professional Ethics, structured literacy, and CR-SE to be integrated throughout educator preparation programs and directs the Department to determine whether this requirement is being satisfied by educator preparation providers. This instruction must align with standards for competencies in professional ethics, structured literacy, and CR-SE that would be developed by the *Department in collaboration with demonstrated experts in these areas as set forth elsewhere in this proposed rulemaking (§ 49.14(4)(I))*.

Section 49.16. Approval of Induction plans

We recommend including **structured literacy** in the induction plans and should be part of this requirement for all new educators.

Section 49.17. Continuing Professional Education

In this section Structured Literacy is identified for elementary level only, while all other area are listed as K-12. Based on the Grade Levels listed under Section 49.85 (see below)

- (1) Early Childhood (prekindergarten, kindergarten, grades one through four or ages 3 through 9).*
- (2) Elementary/Middle (grades four through eight or ages 9 through 14).
Elementary/Middle Certificates permit instruction in any subject in grades four, five and six and in a core academic subject or subjects in grades seven and eight.*
- (3) Secondary (grades seven through twelve or ages 11 through 21).*
- (4) Specialized Areas (prekindergarten through grade twelve or up through age 21).*
- (5) Special education-PK—8 (prekindergarten through grade eight (ages 3 through 14)).*

We suggest the following changes:

- 1- require **structured literacy** be inclusive of all grades
- 2- ensure **reading specialists, special educators** are required to receive training in **structured literacy** at the preservice, induction, and continuing education levels.
- 3- In this section **structured literacy** is reduced to elementary only and should be deleted reference to elementary.
- 4- **Structured literacy** must begin in Pre – K and continued into elementary and middle levels at minimum.

Comments and questions:

1 - It is not clear to us the definition of “Cognitive Competencies” referenced several times in this document.

2 - Regarding Section 49.111 Supervisory Certificate, we oppose this recommended change because of the impact on the literacy needs of young children. Currently and for the last several years, there is a shortage of school psychologists which would only be exacerbated with this requirement. In many districts, student are not receiving timely evaluations in order to receive special education services. Therefore, literacy needs are not addressed appropriately and parents are required to initiate due process to receive services for their children. Many times, resulting in school entities paying for private school because of the lack of timely evaluations.

3 – We encourage the Board to add the suggested credit hour requirements for both pre-service and in-service programs that we suggested in our testimony at the hearing in 2019. While understanding a reluctance to dictate credit hour requirements this is the only way to ensure teachers are receiving the required amount of instruction time needed learn structured literacy. This has been done in the past by the state board. See below for changes in made in 2010:

(4) Evaluation and approval of [teacher education] educator preparation programs leading to the certification and permitting of professional personnel. (i) The evaluation by the Department will provide assurance that, on or before January 1, 2011, teacher education programs will require at least 9 credits of 270 hours, or an equivalent combination thereof, regarding accommodations and adaptations for students with disabilities in an inclusive setting. Within the context of these 9 credits or 270 hours, instruction in literacy skills development and cognitive skill development for students with disabilities must be included, as determined by the institution. At least 3 credits or 90 additional hours, or an equivalent combination thereof, must address the instructional needs of English language learners. For purposes of this requirement, 1 credit equals 30 hours of coursework. Applicable hours are limited to a combination of seat hours of classroom instruction, field observation experiences, major research assignments, and development and implementation of lesson plans with accommodations and adaptations for diverse learners in an inclusive setting

Literacy Coalition testimony given in spring of 2019:

Pre-service teacher programs: Require 9 hours of course work that cannot be relaxed or combined into general competencies

Two - 3 credit hour courses, one focused on k-2 and the other focused on grades 3-4. In scientifically researched and evidence-based reading instructional strategies that improve reading performance for all students. It should include the use of explicit, systematic, and sequential approaches to reading instruction, developing phonemic awareness, and implementing multisensory/structured literacy intervention strategies.

and One, 3 credit hour course in the assessment of reading skills in children K through grade 6. Again, based on evidenced based screening and assessment procedures in the

area of literacy to include: oral language development, phonemic awareness, phonics-word study, fluency, vocabulary, and comprehension.

In-service teacher programs: Require 2 college credits or equivalent in-service hours

- in the use of explicit, systematic, and sequential approaches to reading instruction, developing phonemic awareness, and implementing multisensory intervention/structured literacy strategies.

This should be required for renewal of a professional certificate in any area of certification that includes reading instruction or intervention for any students in kindergarten through grade 6, including elementary, middle, special education, and ESL teachers, speech/language clinicians/pathologists, reading specialist and reading coach.

Once again, we appreciate the opportunity to provide comment and Boards time and efforts. If you have any questions, please contact Daphne Uliana. She can be reached at Daphne@literacycoalition.org or 610.703.7099. Thank you.