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January 15, 2021

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 the proposed Chapter 49 changes published in the PA Bulletin on December 19, 2020.

The Pennsylvania Branch of the International Dyslexia Association (PBIDA) is committed to bringing structured literacy methods to scale in classrooms throughout the state. Decades of research have established that structured literacy practices benefit all children learning to read, including children at risk for reading failure. The scientific evidence indicates that the majority of all children require the explicit, systematic, code based instructional methods that characterize structured literacy in order to learn how to read. These methods not only involve phonics-based instruction to teach children how to decode and read words quickly and accurately, they involve building students' vocabulary and background knowledge, and exposing them to a wide array of literacy genres and topics in order to build comprehension skills. The goal of this approach is to support the brain's ability to make the necessary connections between letters and sounds rapidly and automatically so more cognitive energy can be devoted to comprehension and critical thinking.

While structured literacy methods are essential in the early grades so children can build the foundational skills needed for fluent word reading, older children who continue to struggle with reading in the middle and secondary grades need systematic code-based instruction to succeed. For this reason, PBIDA believes that elementary, middle grade and secondary level teachers of reading all need strong knowledge of structured literacy methods. Given that general educators at the elementary level are primarily responsible for teaching children to read, they need specific training in structured literacy methods, along with their special education and reading specialist colleagues. All middle grade and secondary level teachers of reading require this training as well in order to meet the needs of older struggling readers. In order for older students to reach grade level, they must make multiple years' growth to catch up. This cannot happen without structured literacy intervention. Ultimately, all students must develop robust

word reading and comprehension skills in order to meet the increasingly difficult demands of post-secondary education and the adult workplace.

The International Dyslexia Association has developed the Knowledge and Practice Standards for Teachers of Reading (KPSTR) to guide teacher preparation at the pre service and in-service levels ([link here](#)). The KPSTR are a comprehensive resource that offer specific guidelines for preparing teachers with the expert knowledge and skills they need to effectively implement structured literacy in the classroom. PBIDA strongly recommends that Chapter 49 teacher training requirements in structured literacy be aligned with the KPSTR.

PBIDA has worked in partnership with the Read By 4th coalition to expand teacher training that is aligned with the KPSTR in the state of Pennsylvania. There is a reading crisis in our state, given that only 40% of fourth grade students were able to read proficiently on grade level on the most recent National Assessment of Educational Progress (NAEP) in 2019. In order to meaningfully address this ongoing crisis, all children must have access to high quality, structured literacy instruction delivered by knowledgeable teachers.

Aligning Chapter 49 with the KPSTR will facilitate bringing structured literacy methods to scale, a necessary step in ensuring that all children in Pennsylvania are able to read on grade level by the time they reach the 4th grade. Research shows that this milestone is strongly associated with successfully graduating from high school, avoiding involvement in the criminal justice system, and being able to sustain employment in order to earn a living wage. Aligning Chapter 49 Certification of Professional Personnel with the KPSTR would be an important step in ensuring that all children in Pennsylvania develop the reading skills they need to lead healthy and productive lives.

PBIDA actively collaborates with literacy partners in Pennsylvania in order to advance the goal of teaching all children to read. As such, we endorse the recommendations for Chapter 49 revisions made by the Literacy Coalition and the comments submitted by Read By 4th (see attachments). Also attached are scientific references that support the importance of teacher training in structured literacy.

Respectfully Submitted on Behalf of the International Dyslexia Association, Pennsylvania Branch Board of Directors:

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Scientific References for PBIDA Comments to Chapter 49

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January 11, 2021

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.

January 15, 2021

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Re: Testimony regarding Chapter 49

To Whom It May Concern:

I am writing on behalf of the Read by 4th (Rb4) campaign, an ever-growing coalition of partners working to ensure all children in Philadelphia read on grade level by the time they reach 4th grade. [As noted in our testimony letter of June, 2019](#), background on Philadelphia's Rb4 campaign can be found in the attached article, *Teaching Our Children to Read – Collective Impact Makes the Difference* (Fall 2018, PBIDA Focus).

The challenge in Philadelphia is significant: according to the 2019 NAEP, 59% of Philadelphia fourth graders are reading at a Below Basic level. Early literacy and reading instruction are general education issues – all teachers need to be equipped to reach struggling readers. Therefore, a key area of Rb4's work is strengthening teacher knowledge in evidence-based reading instruction. Teacher knowledge in evidence-based reading instruction, or the science of reading, can change outcomes for our students.

To this end, Rb4 partners have been promoting the adoption of the *Knowledge and Practice Standards for Teachers of Reading*, at local schools of education - standards that will ensure teachers are equipped to teach literacy on day one, to all students. The *Knowledge and Practice Standards* ("Standards" [click here](#)) were developed by the International Dyslexia Association (IDA) and define the specific knowledge and skills that every teacher needs to teach *all* students to read. [We recommend that Chapter 49 be strengthened and aligned with these Standards, specifically, the changes offered in separate testimony \(attached here\) by the Literacy Coalition, and endorsed by Read by 4th partners, Drexel University and the Pennsylvania Branch of the IDA \(PBIDA\).](#)

In Philadelphia, we will continue to promote the *Knowledge and Practice Standards* at our area schools of education, but our goals will be realized more quickly, if Chapter 49 is in alignment with these Standards. There is momentum [and continuing progress since June 2019](#). The following university programs, through the work of Rb4 partners, meet the *Knowledge and Practice Standards*:

Graduate Programs:
Arcadia University, Reading Specialist and ESL

Clarion University, Special Education, Reading Concentration
Drexel University, Special Education, Multisensory Reading Concentration
Robert Morris University, Reading Specialist and Structured Literacy Intervention
Saint Joseph's University, Special Education: Structured Literacy

Undergraduate Programs:

Saint Joseph's University, Elementary Education, PreK-4
Temple University, Early Childhood Education (ECE)
Temple University, ECE/Special Education, Dual Certification

In addition, one of these universities is in the review process for accreditation of their undergraduate programs, and additional universities are beginning the review process.

We have a movement in the Philadelphia area, but to assure success statewide, we encourage the State Board of Education to strengthen Chapter 49 to incorporate the science of reading, in alignment with the IDA *Knowledge and Practice Standards*.

Sincerely,

Jenny Bogoni
Executive Director, Read by 4th

[Attachments:](#)