



January 15, 2021

State Board of Education
333 Market Street,
1st Floor
Harrisburg, PA 17126
ra-stateboardofed@pa.gov

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, including: Lori Severino, Assistant Professor of Special Education and Teacher Education, Drexel University; Jaclyn Galbally, Assistant Professor, Special Education, Saint Joseph's 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

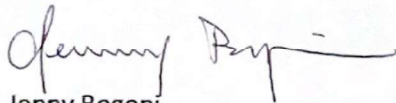
Undergraduate Programs:

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:

Literacy Coalition Ch49 Comments
Focus Fall, 2018, Rb4 Article

Teaching Our Children to Read – Collective Impact Makes the Difference

Nancy Scharff, M.Ed. Special Education

Philadelphia is part of the Campaign for Grade Level Reading (GLR), a national network of over 300 communities all working toward increasing the number of children reading on grade level by the end of 3rd grade. Philadelphia's campaign, branded Read by 4th, is one of the largest and most comprehensive local efforts. The national Campaign for GLR facilitates collaboration and idea-sharing between regions – the collective impact approach. Read by 4th facilitates collaboration both among its more than 130 local partners, and more broadly, with the national campaign. Working together with a clear common strategy, is making a difference for Philadelphia's children.

THE READ BY 4TH CAMPAIGN

The Campaign for GLR requires all members of their national network to adopt a framework grounded in three pillars:

1) get more children ready for kindergarten;
2) get more children attending school regularly; and 3) keep more children connected to learning during the

summer, and you will eventually increase the number of students on grade level by 3rd grade. Read by 4th took that framework and added, 4) ensure high fidelity, evidence-based reading instruction in all schools. Read by 4th then underpins this four-pronged strategy with engaging and supporting families as the best and first teachers of their children.

The Instructional Strategies (IS) committee of Rb4 advances evidence-based reading instruction by working to strengthen:

1) in-service teacher training; 2) pre-service teacher preparation; and 3) parent knowledge in early reading skills. The standards, embraced by the IS committee, for strengthening teacher training are the Knowledge and Practice Standards for Teachers of Reading, developed by

the International Dyslexia Association (IDA) and its affiliate the Center for Effective Reading Instruction (CERI).

Clearly, strengthening teacher training and preparation is a bold undertaking, and one that can only be successful with Philadelphians working together. The committee itself is comprised of 60 partners representing 40 organizations, including area Universities, the School District of Philadelphia, Charter Schools, Parochial Schools, After School Program Providers, Tutoring Programs, Coaching Programs, Foundations and a Research Center.

SCHOOL DISTRICT OF PHILADELPHIA AS A RB4 PARTNER

Philadelphia is fortunate that the School District of Philadelphia (SDP) is an active, extremely engaged, Rb4 partner, embracing the work of the Instructional Strategies committee. Dr. Hite, Superintendent of the School District of Philadelphia, states that "In Philadelphia, we are building the strongest corps of teachers possible through the

long-term strategy of altering the teacher preparation pipeline, and the more immediate term strategy of training – and in some cases [CERI] certifying - our in-service teachers."

Through the work of the Rb4 partners, particularly the Pennsylvania Branch of the IDA (PBIDA), Rb4 reaches out to area universities to pursue IDA accreditation for their teacher preparation programs. The progress to date is impressive. Philadelphia now has four university teacher preparation programs accredited by the IDA: Graduate programs at Saint Joseph's University, Drexel University and Arcadia University; and the undergraduate, Early Childhood Education program at Temple University.

In addition, a cohort of District Literacy Coaches, and a cohort

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of special education teachers, are pursuing CERI aligned coursework, and taking the CERI exam.

With a growing presence of teachers of reading, grounded in the KPS – both from accredited university preparation programs and in-service training aligned with the KPS, Philadelphia is positioned to build the strongest corps of teachers possible. But there is so much more to be done, and PBIDA is increasing its engagement even further.

PBIDA AS A RB4 PARTNER

Because of the commitment of Read by 4th to evidenced-based reading instruction, and the ongoing work around KPS aligned teacher training, the PBIDA has developed a special agreement with IDA to facilitate the work of university accreditation in the Philadelphia area and throughout the state of Pennsylvania. PBIDA will take the lead going forward with all Rb4, university accreditation work. PBIDA and Rb4 share the goal of getting as many children as possible reading on grade level before 4th grade.

Through annual conferences and other workshops, PBIDA will assist teachers in acquiring the continuing education credits necessary to maintain their CERI certifications at all three levels: Classroom Teacher Knowledge Certificate; Structured Literacy/ Dyslexia Interventionist; and Structured Literacy /Dyslexia Therapist.



RB4 AS A NATIONAL GLR PARTNER

Grade Level Reading Week is the annual conference for campaigns from across the country, and this July, Philadelphia's Rb4th campaign was honored to be the host. Over 750 attendees from around the country – funders, and community and state leaders – convened for 4 days in Philadelphia. Rb4 co-presented an opening plenary that included our Governor and our Mayor. In addition, Philadelphia shared its experience not only

in individual connections, and through scheduled sessions, but through a Gallery Walk that articulates and represents the work of its 130 partner organizations. This collaboration at a national level supports accelerated impact for all participants.

Collective impact is showing results in Philadelphia. Among many other positive, leading indicators, on last year's statewide PSSA test, SDP third grade performance increased by 5 percentage points. An additional university program achieved IDA accreditation each year for the past 3 years – and PBIDA is committed to growing that number going forward. The School District of Philadelphia is committed to the short-term, as well as the long term, strategy of building the strongest corps of teachers possible. Together with the collaboration of Rb4's many other partners, Philadelphia is moving toward its goal of doubling the number of children reading at grade level as they enter 4th grade.



Nancy Scharff, M.Ed. Special Education; Read by 4th Instructional Strategies Consultant; Board Member, KIPP Philadelphia Schools; Former Executive Director, Current Board Member, ReadWorks.org.



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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.