



November 19, 2019

Dr. Tine Sloan, Commission Chair
The Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, CA 95811

RE: Public Comment on Further Discussion of Candidate Assessment Options for the Teaching of Reading and Developing Literacy - Agenda Item 3E (pgs. EPC 3E-1 through 3E-16 Educator Preparation Committee)

Dear Chair Sloan:

On behalf of the EdVoice Board of Directors, I write to express continued concern regarding the proposed candidate assessment options for the teaching of reading and developing literacy located in Item 3E of the November 2019, Commission Meeting.

According to 2019 SBAC scores, sixty-four percent of California's low-income third graders cannot read on grade level. On the NAEP, sixty-eight percent of California fourth-graders *overall* did not reach proficiency in reading, with only 18% of African American fourth-graders reaching proficiency. Science-based, structured, and explicit reading instruction is not only needed for students with dyslexia or a small number of "struggling readers" - it is critical for solving California's far-reaching literacy crisis for the overwhelming majority of students.

California should be a leader in the settled science on teaching reading and must ensure all of its children needing to learn how to read are being taught by a teacher who knows how to teach reading with scientifically proven methods.

EdVoice strongly opposes the proposals in Item 3E to eliminate or diminish content expectations for the individual licensure of California's multiple subjects teachers and education specialists. Such an action would remove necessary protections for California's most vulnerable students and leave nothing in its place. Rather than eliminating the teaching of reading as a licensure requirement, we believe the Commission should focus on enhancing the reliability and validity of the current assessment instrument itself, consider separate sections and cut scores to lower the cost of retakes, and work to better understand the wide range of passing rates among educator preparation programs through accreditation and other review processes.

The proposed licensure and assessment options for teacher candidates entering a career in teaching students to read fail to protect consumers, particularly the families and students disproportionately served by new teachers in California. Indeed, eliminating an objective licensure requirement for competency in teaching the foundational skills of reading would take a necessary constitutional protection away from the more than 234,000 students each new cohort of teachers

will serve, disproportionately impacting low-income students and students of color. As currently proposed, options in Item 3E therefore should be rejected.

Instead, EdVoice urges the Commission to engage in the appropriate oversight of the current assessment vendor and outlier preparation programs which demonstrate high failure rates. This should include a review of the current instrument and scoring rubric to ensure that the assessment is valid, reliable, free from bias and incorporates science-based reading instruction so that all California teacher candidates “essential to reading instruction” have demonstrated competency in the research-based expectations defined in statute (Education Code Sections 44259 and 44283). And, at a minimum, every program with a high failure rate should have a failing or conditional status on its accreditation review.

As you know, the California Constitution, Art. IX, Sec. 5, guarantees each student access to a basic education, to which effective reading and writing instruction is obviously foundational. Indeed, the California Supreme Court has made clear that the state bears the “ultimate responsibility for public education [that] cannot be delegated to any other entity.” *Butt v. State of California*, 4 Cal. 4th 668, 681 (1992). In turn, Education Code Section 44283 is clear—there is simply no statutory authority to delegate the responsibility of the development, adoption or administration of a reading instruction competence “licensure” assessments to teacher preparation programs through coursework or otherwise locally developed assessments. Rather, “[t]he Commission *shall* develop, adopt, and administer . . .” standards for those seeking a credential “essential to reading instruction.” Education Code Section 44283(b). Currently, the written and videotaped versions of the RICA are the Commission’s policy tools to meet this statutory requirement.

The claim that the current assessment is somehow outdated or misaligned with the 2014 ELA/ELD Framework is simply unfounded, as the Commission itself confirmed in both its February and September 2019 meetings. While literacy instruction is not limited to teachers of early reading and younger students, foundational reading pedagogy is obviously most important at that stage. Adding requirements for identifying older students with serious and mild reading difficulties is warranted, but expanding the single subject candidates’ expectations in literacy instruction cannot diminish the focus on foundational reading skills for new teachers of students entering school at a brain development stage where science is settled on effective teaching strategies.

Indeed, the RICA’s current content expectations are aligned with the recommendations of the National Reading Panel – the most extensive review of reading science to date. In contrast, Item 3E cites a 2015 Stanford study about different methods of reading instruction that had **an n-size of only “16 literate adults”** as its basis for claiming “new brain and neuroscience research . . . into the ways students learn to read” presumably justifies eliminating or substantially modifying the current assessment. Dramatic policy changes impacting nearly all California’s students should not be premised on a single study with such a narrow sample and no replication of findings in the research community.

There is strong evidence – including the Commission’s own Annual Report Card on California Teacher Preparation Programs – that too many teacher preparation programs fail to deliver

instruction based on the scientific consensus about what works when teaching children how to read. EdVoice commented on the RICA pass rates among teacher preparation programs during the Commission's September discussion of Item 5B and the low pass rates in its sampling of accreditation reports from these institutions. This glaring omission of oversight of high failure rates in accreditation reviews also obscures the fact that pass rates range from 55% to 100% for schools of all variations of demographic makeup of the Commission's own data point to fundamental issues of accreditation and alignment ~ not RICA validity or bias.

Unfortunately, programs with high failure rates are only reviewed by the Commission on a 7-year cycle at best, and are not even explicitly required to include the science of reading in their curriculum. Indeed, Commission staff have acknowledged that foundational reading expectations are not included to avoid redundancy with the reading assessment licensure requirement.

The Legislature has already determined research-based foundational skills are absolutely critical and demonstrated competency by each licensee, not just each program, as an obligation the state has to every California student. Regarding proposed alternatives, it is unlikely that the Legislature will appropriate the resources necessary to the Commission so that it can make sure that over 100 programs are teaching candidates with fidelity science-based foundational skills in California every year, let alone audit schools of education across the nation in a timely manner. All candidates must be required to objectively demonstrate competency in science-based reading instruction, as a high-stakes licensure requirement for the protection of students' fundamental right to a basic education

Thank you for the opportunity to provide input and your consideration of these comments. If I can be of any further assistance, or if you have any questions, please do not hesitate to contact me directly.

Respectfully,



Bill Lucia
President

Cc: Mary Vixie Sandy, Executive Director, Commission on Teacher Credentialing
Teri Clark, Director, Professional Services Division, Commission on Teacher Credentialing
Anthony Williams, Legislative Affairs Secretary, Office of the Governor
Jennifer Johnson, Deputy Legislative Affairs Secretary, Office of the Governor
Jeff Bell, Program Budget Manager, Department of Finance
Lynn Lorber, Chief Consultant, Senate Education Committee
Roger Mackensen, Republican Policy Consultant, Senate Education Committee
Tanya Lieberman, Chief Consultant, Assembly Education Committee
Robert Becker, Republican Policy Consultant, Assembly Education Committee