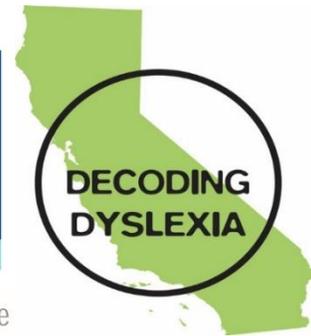


PaRa loS niños



for the childRen



July 27, 2020

The Honorable Patrick O'Donnell
Chair, Assembly Education Committee
1020 N Street, Room 159
Sacramento, California 95814

RE: SB 614 (S. Rubio) as amended July 27, 2020 – OPPOSE

Dear Chairman O'Donnell:

We write in strong opposition to SB 614 (S. Rubio). This bill proposes to deny settled science by removing explicit language in the Education Code on the foundational reading skills of research-based reading instruction. SB 614 would also eliminate a uniform minimum state standard for reliable and valid evidence of individual competency in science-based reading instruction as a prerequisite to earning a teaching license in California.

SB 614 would take California backward and sanction the failed whole language approach for teaching reading that resulted in California fourth grade students reading near the bottom of the nation in 1994, tied with Louisiana and only ahead of Guam.

When nearly half of California's students still do not read at grade level, it is deeply concerning that the state would eliminate the sole uniform requirement for elementary school teachers and special education teachers to demonstrate their knowledge of teaching reading with proven science-based instruction. California needs to do more to improve reading outcomes for all students but SB 614 moves in the wrong direction with no science-based replacement.

It is especially alarming that the state would officially abandon the settled science and detailed content specifications from the Education Code and eliminate explicit reference to the component parts of foundational skills in reading that are known to be necessary for all students, especially at-risk students and students with dyslexia, who are often the most in need of strong, explicit, systematic reading instruction in order to become fluent readers.

SB 614 fails to safeguard students' fundamental right to a basic education, ensure equity of opportunity for all students, or protect aspiring teacher candidates from inter-rater scoring bias. The bill would repeal explicit minimum necessary individual licensure standards required of all other professionals licensed by the state. SB 614 repeals requirements for content validity and inter-rater scoring reliability in either an objective or performance based modality of assessment. The bill abandons necessary uniform and valid reading instruction competency assessment standards for all prospective elementary and special education teachers, thereby failing to ensure every new teacher knows how to teach children how to read using proven scientific methods as a condition of state licensure.

We join the researchers, teachers and authors of the current California ELA/ELD Framework, the Common Core State Standards, and scientists and practitioners specializing in the science of reading who are standing up in strong opposition to SB 614. Indeed, more than eighty experts from across the nation have signed an opposition letter to SB 614, which is more than double the number of researchers listed in opposition on the last version of this bill. These experts have gone on record for all students to publicly reject the ongoing attempt by the proponents of SB 614 to promote failed whole language techniques that ignore the scientific consensus of the explicit foundational skills needed to read and how children learn to read.

SB 614 would leave blatant holes in the state licensure requirements, failing to protect students by authorizing gap years when no evidence of reading instruction competency is required of new teachers licensed by the state. And, the proposed scheme going forward has no ongoing requirement for state assurance for accountability of programs to maintain a minimum competency standard for individual licensure of new teachers after a single review during a once every 7 years accreditation cycle.

We also note that proponents of SB 614 are incorrect about the current assessment's relevance and alignment to the current ELA/ELD frameworks. California Commission on Teacher

Credentialing (CTC) staff testified at the September 2019 meeting that, “the RICA content specifications were also later reviewed following the adoption of California’s Common Core state standards to assure that the content specifications were still in alignment with the Common Core framework.” In addition, “the RICA assesses the foundational skills of teaching reading and is aligned with the current ELA/ELD framework.”

Furthermore, the existence and importance of California’s current assessment linked to the foundational skills empirically found in the settled science in reading was used in 2019 by the State Board of Education (SBE) and the California Department of Education (CDE) as justification to support the successful grant of \$37.5 million for the state’s literacy initiative. The SBE, CDE and CTC are all on record within the last year stating that the current assessment is relevant and key to the state’s reading instruction and literacy efforts.

*“The California Commission on Teacher Credentialing (CTC) works to ensure that pre-service teacher candidates have the knowledge and skills to provide reading instruction and literacy development. The CTC recently revised the teacher preparation standards to focus on development of candidate competence on the Teaching Performance Expectations (TPEs) and the **Reading Instruction Competence Assessment (RICA) specifications**. Teacher preparation programs are required to align their course content for reading instruction with the RICA content specifications in addition to the current program standards and TPEs.”* (Source: “Comprehensive Literacy State Development Program Grant Application”, State Board of Education Agenda Item 10, Attachment 1, page 13, July 2019)

SB 614 proposes a costly and incomplete state review of over 248 approved teacher preparation programs through a 7-year accreditation cycle with 6-year gaps. This scheme does not hold programs or individual candidates accountable on an ongoing every year individual basis for state licensure purposes to demonstrate all candidates are being taught or achieving minimum mastery of research-proven methods and basic knowledge of the detailed components of the foundational skills of early reading for all students to gain fluency and comprehension. In fact, research findings from a [pilot](#) (Bastian, et al., 2016) on this very method specifically recommend against using the SB 614 approach for state licensure, finding upward scoring bias, and risk of errors from inter-rater reliability and validity. Researchers concluded use for individual high stakes professional licensure was “inappropriate” for states or teacher preparation programs (TPPs):

“Regarding other purposes for teacher candidate performance assessments, such as high-stakes teacher certification decisions, these results suggest that it may be inappropriate for states or TPPs to base such decisions on locally-scored performance assessment portfolios.”

SB 614 would also repeal the current requirement that any assessment maintain inter-rater reliability, be free from scoring bias, and be connected to explicit enumerated content specifications to ensure the instrument is valid. SB 614 would require a significant increase in the CTC budget and result in directly increasing program review and candidate examination

fees—both resulting in higher tuition and higher licensure fees for new teachers. The entire statutory scheme of SB 614 is ill-advised and a giant step backward in reading instruction in California and adds new cost barriers to programs and candidates entering the teaching profession.

California was a leader in the settled science on teaching reading and was moving forward in providing its teacher candidates strong support in understanding the science of reading instruction so that all families can be sure of the basic promise that their child’s teacher knows how to teach reading with proven methods. SB 614 would abandon a state commitment to the science of reading instruction, leave students and teacher candidates in limbo subject to inter-rater reliability flaws and bias and establish hundreds of different passing standards for an individual state-licensure requirement. This approach is not appropriate as a licensure requirement and is not used in any other profession requiring a state of California license. Further, SB 614 would very likely subject the state, preparation programs and school districts to costly litigation.

SB 614 denies the proven science of reading instruction and takes California backwards to an era where experimental and otherwise non-proven methods for teaching reading were the norm. This would be a serious mistake and one that California’s children simply cannot afford.

Accordingly, we strongly urge you to oppose SB 614.

Respectfully,

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CC: Senator Susan Rubio, 22nd Senate District
Members, Assembly Education Committee