



September 10, 2018

Dr. William “Brit” Kirwan, Chair
Maryland Commission on Innovation and Excellence in Education
% Office of Policy Analysis
Department of Legislative Services
90 State Circle
Annapolis, Maryland 21401

Dear Dr. Kirwan:

Attached is [Decoding Dyslexia Maryland’s](#) feedback on draft elements for working groups 1-4. Feedback for working groups 1-4 were previously submitted in a Memorandum on August 2, 2018 and the comments attached include a summary of the original comments for working groups 1-3. Working group 4 feedback addresses the draft elements presented by Work Group 4 Chair Joy Schaeffer on September 5, 2018.

We agree with comments submitted by the Education Advocacy Coalition and the Maryland Education Coalition that tutoring is not a panacea for all difficulties -- students need wrap around behavioral, academic and social support in all grades, with an emphasis on prevention and intervention in the early years. Educator training, support and pay should be an overarching priority for Maryland.

We also agree that tutoring will only be successful for students if the tutors are qualified and able to teach using evidence based instruction that matches a student's needs within a multi-level, high quality instruction and intervention framework. Access to evidence based instruction is a key component of an effective wrap-around support system and must be prioritized in instructional frameworks and funding.

Working Group 1: Early Childhood Education

Element 1c

Implementation of School (Kindergarten) Readiness Assessment for All Students Entering Kindergarten

Recommendations

1. **Preventative Reading Screening Framework.** The state should ensure that local education agencies implement an evidence based framework that includes **universal reading screening, informal diagnostic assessments, progress monitoring protocols** and the **professional development** to support this framework (also known as response to intervention/multi-tiered system of support). Reading screening is a best practice recommended by the [National Center on Improving Literacy](#).
2. Working group 1 appears to rely on the KRA to provide this information to educators, but it cannot because it does not fully probe areas known to be predictive of reading success/failure. The cost benefit of the KRA is low as it takes one hour per student to administer, does not have the confidence of Kindergarten teachers (MSEA feedback to Kirwan Commission, Sep. 4) and does not provide predictive, valid reading data to educators.

3. **Instruction and Intervention:** School districts should implement an instructional framework in PK and K to provide evidence based, foundational reading instruction and interventions to students at risk for reading difficulties including dyslexia.
4. The foundation funding (base per pupil amount) must include the costs of an early intervention framework that includes:
 - Preventative universal reading screening;
 - Training on screening administration, scoring and interpretation;
 - The purchase of screening instruments and informal diagnostic assessments;
 - Professional learning educator institute with a core focus on academic instruction in reading and math.
5. Note: St. Mary's County is implementing early screening in PK using the Individual Growth and Development Indicators (IGDI) screening tool.

Working Group 2: High Quality Teachers and Leaders

Element 2a

Teacher preparation will be much more rigorous, and induction will be integrated with teacher preparation more systematically

Recommendations

1. Teacher and administrator assessment competency should include formative instruments that screen students for early indicators of reading difficulty. Educators must also be able to administer informal diagnostic instruments, and administer and track progress monitoring.
2. Pre-service teacher preparation should include a specific focus on indicators of dyslexia, dysgraphia and dyscalculia; the science of reading and the brain, and a focus on screening, assessment and interventions known to work for students with dyslexia;
3. Special educators should have a Master's Degree with a specialty in reading. **4% of special education students read on grade level despite average cognitive ability.** Pre-service special education coursework and practicum must include instruction on how to work with students with learning disabilities and the practicum should allow some experience teaching a struggling reader. University or alternate path coursework must include the science of reading, evidence based reading interventions for dyslexia, a supervised practicum in a public school setting.

Element 2a, 2

The practicum in teacher training will produce teachers whose knowledge and skill is comparable in every way to knowledge and skills of the teachers produced by the teacher training institutions in the top performing countries

1. There are many teachers who undergo a practicum and never work with a struggling student or an at risk student. This is a serious oversight since up to 17% of students have characteristics of dyslexia which can be identified through screening. Teachers must spend part of their supervised practicum working with struggling readers.
2. Special education candidate teachers should spend at least a year working in a supervised practicum and should have some experience working with students with dyslexia, dyscalculia, dysgraphia and other language learning difficulties.

Element 2a, 5

Teacher training programs and districts must collaborate...to strengthen teacher preparation, induction and ongoing professional development..."

1. There are a number of states that train teachers using a collaborative model, guided and funded by the state department of education. **Reference [PaTTAN](#)** -- The Pennsylvania Training and Technical Assistance Network is a good example.
2. 21st Century Professional Development Schools should have public oversight, accountability and participation of the community, including parents and educators.
3. 21st Century Professional Development Schools must follow best practices for a fully aligned instructional system, including curriculum frameworks, course syllabi and assessments to ensure that students stay on track.

Element 2b 2

Teachers will be required to pass state specific exams of teacher mastery of reading and content that will be at least on par with the rigor of the MTEL.

1. DDMD supports requiring educators to pass a reading competency exam like the MTEL.
2. Teacher preparation programs should report aggregated pass/fail rates and other variables to MHEC and MSDE annually to promote transparency within the reading certification program and to allow teacher candidates to choose a competitive pre-service program. Many states publicly report the results of the reading certification exams by university. See [Connecticut](#)
3. All leadership track educators must be certified in a rigorous test of reading instruction.

Element 2g

Career ladder for teachers

1. DDMD supports a career ladder for teachers with higher pay, mentoring, certifications in reading, a practicum and more professionalism granted to educators.
2. Leadership track teachers must have experience working with struggling students and students at risk for reading failure and demonstrate the ability to screen and provide instruction and interventions for these students.

Element 2i

Change the way schools are organized and managed to increase the amount of time available for teachers to...

1. This element requires more specificity in what the “use of data” means. We suggest that use of data definition include the use of screening instruments, informal diagnostic tools and progress monitoring instruments to determine which students are at risk for reading failure and to then determine their instruction/intervention and monitor student progress.
2. A glossary or Technical Assistance bulletin from MSDE that coordinates with the glossary developed by the Work Group to Revise the Reading Coursework Standards is suggested to clearly delineate terminology.

Working Group 3: College and Career Readiness Pathways

Element 3a

Develop a fully aligned instructional system, including curriculum frameworks, course syllabi and assessments, together with clear examples of standard setting work and formative assessments to ensure that students stay on track.

Recommendations

1. Screening is a type of formative assessment and is part of a fully aligned instructional framework that provides educators with information about which students are at risk for reading difficulty before they fall behind. Screening is part of a prevention-oriented framework and a student from any background might struggle to learn to read. Sources: [Ready to Read, Ready to Succeed: State Policies that Support Fourth Grade Reading Success](#), 2018; [Essential Components of RtI: A closer look at response to intervention 2010](#). Reading screening assessments and training should be included as a formative assessment and duly funded local districts can implement screening. See [Oregon](#)
2. If Element 3c, transitional tutoring, is to be truly transitional, it means that improved educator training in reading must be implemented. Districts can implement a “fully aligned instructional system,” but it will require ongoing professional development that must be included in the foundation formulas. (See [PaTTAN in Pennsylvania](#)).
3. A fully aligned reading instructional framework should include best practices developed by the [National Center on Response to Intervention](#) and the [National Center on Improving Literacy](#). Instructional program purchases should be aligned with the CCRS, including [MCCRS Appendix A](#), pp.19-21 and federal law (ESSA).
4. Poor reading instruction and professional learning disproportionately affects students at risk for dyslexia. Maryland must ensure that teacher preparation programs and local districts provide teachers with the knowledge & practice needed to teach evidence based, foundational reading skills for grades PK-12 students and provide the funds to support the training should in the foundational funding.
5. Inspection teams assembled and working under the supervision of MSDE should include educators knowledgeable in foundational reading instruction and dyslexia.

Element 3c

Transitional tutoring for all K-3rd grade students identified as **struggling learners**. Transition this role to school teachers as time is freed up and training is added to teacher prep; students who continue to need tutoring beyond third grade should be provided with this support.

1. **Word of Caution:** It should not be assumed that tutors will be hired and trained using compensatory funding only. **Struggling readers are found in all student subgroups and funding for tutoring should not be based solely on socio-economic status.**
2. Reading screening should be used to determine which students in PK-3 need additional tutoring/intervention and services.
3. Up to 60% of students in grades 3-12 are considered struggling readers and these students should also receive reading tutoring interventions and supports; these additional supports may include academic, behavioral and/or social/emotional services.
4. The lead teacher in each school in charge of the tutoring program should have specific expertise in reading literacy, structured literacy competencies and dyslexia.
5. **Cross-Age Peer Tutoring** should only be used as an adjunct or supplement to explicit, specialized reading instruction and intervention supervised directly by an educator trained and certified in foundational reading.

6. Funding for tutoring should not depend on tutors paid out of compensatory education funding. Commensurate funds should be provided to cover all costs of the transitional program which will serve students from all backgrounds. Approximately 531,000 Maryland students may qualify for tutoring (60% of students) and not all of these students are “at risk”.
7. We recommend a much smaller ratio of tutors to students than 1:125 be allocated with commensurate funding.
8. Decoding Dyslexia Maryland and experts in the field of reading disability and dyslexia should be included in stakeholder groups.
9. A research organization should be hired by MSDE to evaluate tutoring outcomes.
10. A glossary should be created so that everyone is clear on what is meant by the terms used in this element. “At risk” must be clearly defined along with other terminology.

Working Group 4: More Resources for At-risk Students

Element 3c (shared w/ working group 3)

Transitional tutoring for all K-3rd grade students **identified as struggling learners**. Transition this role to school teachers as time is freed up and training is added to teacher prep; students who continue to need tutoring beyond third grade should be provided with this support.

Recommendations

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2. Reading screening should be used to determine which students in PK-3 need additional tutoring/intervention.
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10. A glossary should be created so that everyone is clear on what is meant by the terms used in this element. "At risk" must be clearly defined along with other terminology.

Element 4c

Revise funding formula weight for special education students

Weighted funding for special education must include the following:

1. For these students to close the gap, they must achieve accelerated gains in reading -- this can only be done if the instruction and instructor are highly trained and knowledgeable in the field of reading. Personnel training and funding is key.
2. Additional special education teachers, school psychologists, speech language pathologists and other personnel must be hired.
3. Parent engagement must begin before the first day of school. [Pennsylvania has an excellent parent engagement model embedded in its reading and dyslexia education pilot](#) program, now in year 4 and expanding due to excellent student outcomes. The [National Center on Improving Literacy](#) also has excellent resources.
4. In-service educator professional development should include dyslexia-specific instruction and interventions and accommodations for PK-12 students.
5. Pre-service teacher preparation should include a specific focus on indicators of dyslexia, dysgraphia and dyscalculia, the science of reading and the brain, and a focus on screening, assessment and interventions known to work for students with dyslexia. Educators must be able to determine if a child is struggling to read and offer proven interventions to bring the student to grade level in reading. Special Education teachers must be experts in the [knowledge and practice for teachers of reading and dyslexia](#) interventions on day one in the classroom in order to address students with basic reading and written language difficulties.
6. Pre-service special education coursework and practicum must include instruction on how to work with students with learning disabilities and should include the science of reading, evidence based reading interventions for dyslexia, a supervised practicum in a public school setting with a student with a reading disability.
7. Disability awareness training for all educators to encourage collaboration, equity, understanding, motivation, learning and improved outcomes.
8. Some districts in Maryland are hiring and training teachers with experience remediating dyslexia. All districts should explore a special education certification in dyslexia and reading through [International Dyslexia Association \(IDA\)](#), the [Center for Effective Reading Instruction](#) and/or explore the coursework offered by [Notre Dame of Maryland Graduate Certificate in Dyslexia](#).

[Decoding Dyslexia Maryland](#) parents, teachers and students from [15 local chapters](#) support the efforts of the Commission on Innovation and Excellence in Education to offer all students a world class education, invest in educators and provide more resources to struggling students.

On a side note, please listen to the APM Educate Podcast, released today entitled: [Hard Words: Why Aren't Our Kids Being Taught to Read?](#)

Thank you,

Laura Schultz, Karleen Spitulnik & Janice Lepore
Decoding Dyslexia Maryland, State Leaders
DecodingDyslexiaMD@gmail.com

Attachment: 1 - PARCC Reading Scores, Maryland 2018, subgroups

Maryland - 2018 PARCC Scores

Percentage of Students Proficient in Reading

All, Special Education and FARMS Students

