



**Ohio Comprehensive Literacy State  
Development Grant Application**

**Submitted June 3, 2019**

## Contents

Introduction.....	2
COMPETITIVE PREFERENCE PRIORITY 1: Promoting Literacy .....	3
COMPETITIVE PREFERENCE PRIORITY 2: Empowering Families and Individuals to Choose a High-Quality Education That Meets Their Unique Needs.....	4
Section A: Need for Project .....	5
Part 1: Ohio’s Literacy Needs Assessment .....	5
Part 2: Gaps and Weaknesses in Services, Infrastructure and Opportunities.....	8
Section B: Project Design .....	9
Part 1: Project Design Components .....	10
Part 2: Goals, Objectives and Outcomes .....	11
Part 3: Integration of Performance Feedback and Continuous Improvement in the CLSD Project Design .....	15
Section C: Management Plan.....	17
Part 1: State Implementation Plan.....	17
Part 2: Managing Key Activities .....	20
Part 3: Procedures for Ensuring Feedback and Continuous Improvement .....	25
Section D: Project Services.....	27
Part 1: Operationalizing the Project Design.....	27
Part 2: Likely Impact of Services Provided by Proposed Project .....	32

## Introduction

For two days in March 2019, more than 800 educators from across Ohio attended the Second Annual State Literacy Academy. Plenary events were standing room only. Dozens of sessions with presentations by national experts, as well as Ohio practitioners were oversubscribed. No other event sponsored by the Ohio Department of Education created such buzz or received such positive feedback as the Literacy Academy. The academy is one small piece of evidence for the growing excitement and momentum happening around literacy in Ohio's education community.

Ohio's robust and cohesive portfolio of literacy policies, practices, pilots and grants is aimed at ensuring *all* students are challenged to discover and learn, prepared to pursue a fulfilling post-high school path and empowered to become resilient, lifelong learners. This should come as no surprise since Ohio's policy framework and strategic agenda prominently feature a focus on literacy. Ohio's strategic plan for education: *Each Child, Our Future*, adopted in August 2018, has a specific focus on the importance of literacy. [Ohio's Plan to Raise Literacy Achievement](#) sets forth a detailed approach to improving literacy at all grade and age levels. The state's Striving Readers Comprehensive Literacy Grant is providing support to more than 150 districts, and 155,000 students. Ohio's Early Literacy Pilot; high-quality and aligned early learning and K-12 English language arts learning standards; extended standards and learning progressions; aligned system of assessments; the literacy component of the state's accountability system and report cards; and the Third Grade Reading Guarantee legislation round out Ohio's commitment to aggressively address the needs for improving students' literacy skills and outcomes.

Yet, even with these efforts, too many of Ohio's students struggle in literacy development. In the 2017-2018 school year, 38.8 percent of the state's third-graders were not proficient in English language arts. For third-graders with disabilities, the percentage is 67.2 percent.

Ohio's Comprehensive Literacy State Development Grant (CLSD) proposal will aggressively amplify the state's plan for raising literacy achievement by developing a robust system of geographically and economically diverse Model Comprehensive Literacy Sites designed to facilitate professional learning and coaching throughout the state. This approach will inform the allocation of statewide resources, further peer networking among like districts and showcase high-quality instruction in high-needs schools and early childhood sites serving students from low-income families. The CLSD grant will allow Ohio to rapidly scale evidence-based language and literacy practices throughout the state, enabling more local education agencies (LEAs) to deploy evidence-based comprehensive literacy instruction programs to benefit students.

#### COMPETITIVE PREFERENCE PRIORITY 1: *Promoting Literacy*

Ohio is committed to providing families with supports promoting evidence-based literacy strategies. It is essential that families be fully recognized as essential partners in reaching the goal of literacy. Ohio includes family partnerships as one of the five components in its Theory of Action for Raising Literacy Achievement. Currently, Ohio is implementing several evidence-based family literacy strategies through Ohio's Early Literacy Pilot and the State Personnel Development Grant that will be scaled through the CLSD grant. These include utilizing *Sit Together and Read at Home* — [STAR@Home](#) (Justice, 2018). The *Star@Home* program is an adaptation of the evidence-based read-aloud program, *Sit Together and Read*, which is used to increase print knowledge and strengthen caregiver involvement in literacy development. Through the CLSD grant, this practice will be scaled within birth-kindergarten entry model sites and regional literacy networks, putting more high-quality books into the hands of young children and providing caregivers with evidence-based literacy strategies to use when reading together.

In addition, the Department has partnered with the Ohio Statewide Family Engagement Center at The Ohio State University to develop *Partnerships for Literacy (P4L)* (Boone & Wellman, 2018). [\*Partnerships for Literacy\*](#) includes a series of focused discussions to support schools in completing an inventory of practices promoting family engagement for early language and literacy development and developing action steps to include in schoolwide reading plans. The inventory includes: communication on language and literacy development with families, and supporting language and literacy at home and strategic community partnerships. *Partnerships for Literacy* will be included in Ohio's guide for Model Comprehensive Literacy Sites, birth-12.

#### COMPETITIVE PREFERENCE PRIORITY 2: Empowering Families and Individuals to Choose a High-Quality Education That Meets Their Unique Needs

Ohio's proposed project has been designed with the intention of increasing the proportion of students with access to educational choice. In the development of the guide for Model Comprehensive Literacy Sites and selection of sites, Ohio is prioritizing equitable access to high-quality teaching and learning to *all* learners, with a specific focus on ensuring models are developed that serve children and students in rural communities, children and students who are English learners, and children and students with disabilities. This equitable access extends to the idea of educational choice and developing high-quality personalized paths for learning. The Department particularly is interested in developing model sites where children, who may require intervention in reading, continue to have access to the personalized learning paths of their choice. In particular, Ohio's efforts will focus on high schools and create linkages to dual enrollment programs, work-based learning experiences (including internships and apprenticeships), credit recovery opportunities and other choice options. To accomplish this, the Department's literacy team is collaborating with the STEM/STEAM consultant, program administrator for career-

connected initiatives (SuccessBound Ohio), rural education liaison, dual enrollment liaison, Office for Exceptional Children, Lau Resource Center for English Learners and other offices with expertise in personalized learning pathways to develop the guide and select model sites.

**Section A: Need for Project** Ohio's Comprehensive Literacy State Development Grant is designed to target Ohio's continuing need to improve language and literacy outcomes, birth-high school. Ohio has identified significant needs, included in underrepresented groups and high-need schools.

**Part 1: Ohio's Literacy Needs Assessment** From birth, many of Ohio's students face challenges to achieving their full educational potential. In Ohio, one-fourth of all children under age 6 live in poverty, and one-half are below 200 percent of the Federal Poverty Level (Ohio Poverty Report, 2017). Young children represent one of the fastest growing segments of Ohio's homeless population (Ohio Housing Finance Authority, Revisiting the Silent Crisis, 2018). The number of children in the custody of Ohio's children services agencies has been rising since 2010. More than 15,000 children were in custody in 2018, and 39 percent of those were under the age of 5 (Public Children Services Association of Ohio, 2019). The societal challenges Ohio's students face can be seen through inequities in educational outcomes and are exacerbated by inequities in access to high-quality education.

Literacy inequities are visible statewide; they are felt even more keenly in Ohio's high-need schools. In 2018, almost half (48.4 percent or 1,616) of Ohio's elementary, middle and high schools were high-needs schools (as defined in the grant notice inviting applications), serving more than 720,000 (43.9 percent) of Ohio's students. While about one-third (32.95 percent) of white, non-Hispanic students attended high-need schools, 83.4 percent of black students, 61.3 percent of Hispanic students, 50 percent of American Indian students, and 56.4 percent of

multiracial students attended high-needs schools in 2018. In addition, a strong majority (70.2 percent) of English learners attended high-needs schools in 2018.

**Birth through Kindergarten Entry:** Children in high-quality rated early childhood education programs perform significantly better on Ohio’s Kindergarten Readiness Assessment than their peers, specifically on Language and Literacy. There continues to be an ongoing need to reach more students with quality early education programs and quality literacy instruction.

- i. U. S. Census Bureau and Ohio’s 2017 Poverty Report identified that over 350,000 children under the age of five are living at or below the 200 % Federal Poverty Level.
- ii. Ohio served over 195,000 children birth through age five through Ohio’s mixed delivery system of early childhood programming yet over 163,000 children remain unserved.
- iii. Ohio serves more than 21,000 infants and toddlers in Early Intervention; 60% have substantial adaptive, cognitive, communication, physical or social-emotional developmental delays.
- iv. Almost 27,000 children with disabilities receive educational interventions between ages 3 and 5 in preschool special education programs.
- v. In 2018, 150,000 (31.3 percent) of Ohio’s students in kindergarten-third grade were not on track for reading on grade level. More than 40,000 of those students were Ohio’s kindergartners, entering a foundational year of learning already behind in language and literacy skills. Improving students’ literacy skills by third grade is no small challenge.

**Kindergarten through 12<sup>th</sup> Grade** Ohio students who enter kindergarten on track in language and literacy are seven times more likely to go on to score proficient on Ohio’s third grade English language arts assessment. However, Ohio still has significant numbers of students who are not on track relative to language and literacy skills when they enter kindergarten.

- i. **Statewide in 2018, more than 40,000 (38.3 percent) of Ohio’s students entered kindergarten not on track in language and literacy.** For certain subgroups, the rate is higher: 74.3 percent of Ohio’s English learners, 67.1 percent of Ohio’s students with disabilities and 51.7 percent of Ohio’s economically disadvantaged students were not on track in language and literacy.
- (b) In Ohio, students who are not proficient in reading by third grade are three times more likely than their proficient peers to *not* graduate on time.
- i. **Statewide in 2018, more than 50,000 (38.8 percent) of Ohio’s third-graders were *not* proficient** on Ohio’s English language arts test, putting their on-time graduation at risk.
  - ii. **Roughly half (49.3 percent) of the third-graders in high-need schools were *not*** proficient on Ohio’s English language arts test, compared to 23.7 percent in non-high-need schools.
- (c) Large numbers of students are not reaching proficiency throughout their academic careers.
- i. **Statewide, more than 380,000 students were not proficient on Ohio’s English language arts tests in grades 3-8 and high school.** Among these struggling readers, 71.4 percent are economically disadvantaged, 30.3 percent have disabilities and 4.6 percent are students who are English learners.
  - ii. Ohio sees the cumulative effects of lagging in language and literacy skills by the time a student reaches high school. In 2018, 53 percent of Ohio’s ACT test-takers scored below the remediation-free level on the English language arts assessment, and only 68 percent of the students taking Ohio’s English I end-of-course high school exam scored proficient.
  - iii. **More than half of the state’s 380,000 struggling readers attend high-need schools.**

### (3) Equitable Access to Effective Literacy Educators

(a) Teachers are the most important school-based factor affecting student achievement; school leaders a close second (What Matters Now, 2016). Ohio is working to address the need for more equitable access to highly effective teachers by students who need the most support.

- i. In Ohio, high-need schools have a lower average percentage of Highly Effective Teachers (43.6 percent vs. 65.3 percent) than schools that are not high-need.
- ii. In high-need schools, 15.6 percent of teachers are inexperienced, compared to 9.5 percent in schools that are not high-need.
- iii. High-need schools have a higher average percentage of courses taught by Out-of-Field Teachers (2.9 percent vs. 0.7 percent) compared to schools that are not high-need.

**Part 2: Gaps and Weaknesses in Services, Infrastructure and Opportunities** Ohio has identified specific gaps and weaknesses in services, infrastructure or opportunities that will be addressed by the proposed project. This was done by leveraging stakeholders participating in the development of the State's Systemic Improvement Plan (SSIP). Stakeholders engaged in a root cause analysis to identify gaps and weaknesses in literacy instruction and infrastructure in the state that include:

1. *Learners who "start behind, stay behind"* - Although learners may make progress, students who begin kindergarten academically behind generally remain behind throughout school. Early literacy must be a primary focus.
2. *District infrastructure/support for teachers* - Districts are challenged in providing effective support to teachers to support quality literacy instruction.
3. *Instructional practices* - Districts were either not utilizing effective instructional practices or not implementing them with fidelity.
4. *District/Building Culture* - The culture of the district and/or building often was not conducive to effective improvement.

5. *Family Knowledge and Involvement* - Families were not being appropriately leveraged as partners in literacy improvement.

**Section B: Project Design** Ohio has developed a project approach designed to address the needs as identified in Section A of this proposal. The vision, objectives, strategies and activities of Ohio's current Plan to Raise Literacy Achievement form the foundation of the project design by supporting the cohesive implementation of four central initiatives:

- (1) Using the **Simple View of Reading** (Gough & Tunmer, 1986) to drive all literacy content development and communication of resources necessary to support Ohio's comprehensive plan;
- (2) Ensuring all learners are represented and supported throughout **the language and literacy development continuum** (emergent literacy, early literacy, conventional literacy and adolescent literacy) and providing specific recommendations for struggling readers;
- (3) Enhancing **partnerships and collaboration** of general and special education practitioners and stakeholders; and
- (4) Enhancing **Ohio's infrastructure supports** to build implementation capacity at the state and regional levels.

As part of this project, Ohio currently is in the process of reconvening the State Literacy Team to revise and update its state comprehensive literacy instruction plan (*in accordance with the Application Requirements part (c) as specified in the notice inviting applications for this grant*). Additionally, in the development of this proposal, the Ohio Department of Education has consulted and will continue to partner with the Ohio Department of Jobs and Family Services, the state agency with a shared responsibility for administering early childhood education programs that also is responsible for administering child care programs (*in accordance with the Program Requirements part (c) as specified in the notice inviting applications for this grant*).

**Part 1: Project Design Components** Ohio has considered the statewide needs assessment, lessons learned from past and current literacy and equity projects (see Section D, p. 32) and research on implementation science and literacy to design the proposed CLSD project. Ohio’s needs assessment indicated five primary areas of root cause (see p. 8) that will be addressed through this project design.

**Developing Model Comprehensive Literacy Sites** Model Comprehensive Literacy Sites will be established across Ohio’s 16 diverse regions to serve as both incubators of sustainable practices and demonstration sites for districts and schools exploring and beginning to implement new practices. These model sites will be school- or program-based and include schools and early childhood programs serving birth-kindergarten entry, kindergarten-grade 5, grades 6-8, and grades 9-12. The chosen sites all will be working toward full implementation of each component of a model site, further described in Section D (p. 27) but will have different entry points based on their needs assessments. This means that though all sites are working toward a common goal, they will be engaged in different grant-supported activities throughout the five years and informing statewide resources across a variety of components. A common feature across all sites will be engagement with either Ohio’s Peer Coaching Model for Literacy Instruction or Ohio’s Traditional Coaching Model for Literacy Instruction. These models and training to support these models are further described in Section D (p. 31). As the sites progress through the grant cycle, they will receive individualized performance feedback and be expected to make mid-course corrections to address any implementation barriers (see p. 15).

**Leveraging Regional Literacy Networks to Scale Evidence-Based Strategies** As an extension of Ohio’s State Literacy Network (a network made up of state, regional and local literacy staff), each of Ohio’s 16 regions support a regional literacy network. These networks are further

described in Section D (p. 29). Throughout the grant cycle and beyond, the model sites will engage in sharing their progress and successful practices of comprehensive literacy instruction for students from economically disadvantaged families, English learners and students with disabilities with districts and schools throughout their regions and the state. As sites reach full implementation for individual components of a model site, such practices will be showcased through the regional literacy network. Districts and schools participating in the regional literacy network will be invited to visit model sites and engage in learning around the successful components through demonstrations, videos and opportunities to network with educators and leaders from the model site. The Department will collect data (see objective 2 measures on p. 13) to determine the impact of the networks and provide performance feedback to inform continuous improvement of the networks.

**Developing Statewide Resources** Learning from the model sites will allow the Department to develop statewide resources to share on the Department’s website and through the Statewide System of Supports. This type of development will allow any district, school or early childhood provider to access resources supporting the implementation of evidence-based language and literacy strategies. The Department plans to develop resources and materials to support the implementation of practices outlined in Ohio’s Plan to Raise Literacy Achievement, develop courses for in-service educators, administrators and coaches, and enhance Department website resources based on the learning occurring in participating school and early childhood sites.

**Part 2: Goals, Objectives and Outcomes** **Project Goals:** Ohio has identified three project goals.

*Project Goal 1:* By school year 2024, participating Model Comprehensive Literacy Sites will increase the percentage of students proficient in reading in grades 3 through high school on the

state English language arts assessment or on track in reading for preschool through grade 2 by 25 percentage points or reach at least 80 percent.

*Project Goal 2:* By school year 2024, participating Model Comprehensive Literacy Sites will increase the percentage of disadvantaged students (students living in poverty, students who are English learners and students with disabilities) proficient in reading in grades 3 through high school on the state English language arts assessment or on track in reading for preschool through grade 2 by 25 percentage points or reach at least 80 percent.

*Project Goal 3:* By school year 2024, non-CLSD funded sites participating in networking opportunities with Model Comprehensive Literacy Sites will increase the percentage of students in applicable grades 3-high school proficient on the state’s English language arts assessment or on track in reading for preschool-grade 2 by at least 10 percent.

**Project Objectives:** Ohio has identified three key project objectives.

*Project Objective 1:* Up to 64 schools and early childhood education programs, located throughout Ohio’s 16 regions, will attain Model Comprehensive Literacy Site status (representing birth-kindergarten entry, kindergarten-grade 5, grades 6-8, and grades 9-12) through successful implementation of evidence-based language and literacy strategies and measurable change in teaching, leading and learning practices.

*Objective 1 Measures:* This objective will be evaluated in early childhood education programs using the Ready Schools Literacy Transition Plan and the Department-developed guide for Model Comprehensive Literacy Sites. This objective will be evaluated in kindergarten-grade 12 school sites using the Reading Tiered Fidelity Inventory (St. Martin, Nantais, Harms, & Huth, 2018) and the Department-developed guide for Model Comprehensive Literacy Sites.

*Project Objective 2:* A regional literacy network will be developed or enhanced in each of Ohio's 16 regions to promote and support additional educational service centers, districts, schools and early childhood education programs in utilizing the Department-developed professional learning and resources and networking with Model Comprehensive Literacy Sites to adopt and implement evidence-based language and literacy strategies and demonstrate measurable change in teaching, leading and learning practices.

*Objective 2 Measures:* This objective will be evaluated by conducting a needs assessment with each regional literacy network, tracking the participation and performance in Department-developed professional development and regional literacy networks, surveying participants, utilizing Reading Tiered Fidelity Inventory data and contextualizing with available student data through Ohio's state assessments and Third Grade Reading Guarantee data sources.

*Project Objective 3:* The Department will develop statewide professional learning and resources for all programs in Ohio to access regarding birth-grade 12 comprehensive literacy instruction using evidence-based strategies, including family literacy strategies and increasing educational options for students who have traditionally been underserved.

*Objective 3 Measures:* This objective will be evaluated using the Observation Checklist for High-Quality Professional Development Training (Noonan, Gaumer Erickson, Brussow & Langham, 2015). In addition, any online training will be evaluated using the Quality Matters K-12 Secondary Rubric, Fourth Edition (2018).

*Objective 4:* Increase the proportion of high school students who may require intervention in reading to have access to high-quality personalized learning paths of their choice.

*Objective 4 Measures:* This objective will be evaluated using a combination of state and local data reported by model sites on high school students' course-taking patterns.

## **Project Outcomes**

To gauge the state's performance, Ohio will measure:

1. The percentage of participating 4-year-old children who achieve significant gains in oral language skills:
  - Preschool programs that serve children ages 3 through kindergarten entry that administer the Ohio Early Learning Assessment collect comprehensive data using learning progressions. Subgrantees will be required to administer the Early Learning Assessment and analyze data that is reported to the state.
  - The Ohio Kindergarten Readiness Assessment is administered to all entering kindergarten students in Ohio's public schools in the fall of each school year and results are reported to the state. It is the first universal assessment of children entering school in the area of language and literacy based on the end of preschool standards. Local subgrantees with participating kindergarten students will be required to analyze this data that is reported to the state.
2. The percentage of participating fifth-grade students, disaggregated by subgroups, who meet or exceed proficiency on state reading/language arts assessments under section 1111(b)(2)(B)(v)(I) of the ESEA;
3. The percentage of participating eighth grade students, disaggregated by subgroups, who meet or exceed proficiency on state reading/language arts assessments under section 1111(b)(2)(B)(v)(I) of the ESEA; and
4. The percentage of participating high school students, disaggregated by subgroups, who meet or exceed proficiency on state reading/language arts assessments under section 1111(b)(2)(B)(v)(I) of the ESEA.

### Part 3: Integration of Performance Feedback and Continuous Improvement in the CLSD Project

**Design** Performance feedback to inform continuous improvement is a critical component of Ohio's project design as the anticipated outcomes of this grant are to develop model sites and inform the professional learning and resources offered by the Department and regional support system to increase literacy outcomes for children and students throughout the state. The project design includes two levels of performance feedback and continuous improvement supported by the procedures described below and in Section C (p. 25). The first is at the local level in that subgrantees are expected to use student and adult implementation data to determine whether their implementation is having the desired impact and, if not, allowing them to make adjustments/improvements based on the information gathered. The second is at the state level, allowing the state to adjust the work that supports the subgrantees and regional literacy networks that informs the development of statewide resources and support (see Section D, p. 29).

#### **Subgrantee and Model Site Performance Feedback and Continuous Improvement**

Subgrantees will use the Ohio Improvement Process, a plan-do-study-act cycle, to continually monitor implementation and adjust as necessary. The Ohio Improvement Process relies on teacher-based teams and building leadership teams to regularly meet, review both student and adult data related to implementation and outcomes, discuss successes and challenges, and make course corrections. In addition, participating schools or early childhood education programs will establish school literacy leadership teams (which may be made up of the school's building leadership team if appropriate). Each subgrantee will utilize the data sources outlined below, in addition to any other identified and relevant local data, to engage in this process.

#### **Local Student Data**

**Birth-Kindergarten Entry:** Participating sites will identify and use a developmentally

appropriate progress monitoring tool or developmental screening tool for participating children ages birth through age 3 as part of their highly rated Step Up To Quality star rating.

**Kindergarten-Grade 5:** Participating sites will identify and use one of the approved curriculum-based measures on Ohio’s approved vendor assessment list for the Third Grade Reading Guarantee diagnostics or identify and receive approval from the Department for a curriculum-based measure not on the approved vendor assessment list. The curriculum-based measure will be used to screen all participating kindergarten-grade 5 students three times a year and must include a progress monitoring component for monitoring intervention supports.

**Grades 6-12:** Participating sites will utilize Ohio’s State Tests for English Language Arts in grades 3-8 and English I and English II tests to screen all participating students for reading difficulties and identify and receive approval from the Department for an additional progress monitoring component for monitoring intervention supports.

#### **Local Adult Implementation Data**

**Multi-Tiered System of Support:** Birth through kindergarten entry teams will implement the Ready Schools Literacy Transition Plan to measure the transition practices of children entering school. Kindergarten through grade 12 teams will implement the Reading Tiered Fidelity Inventory elementary or secondary to measure the “health” of the school’s multi-tiered system of support for reading. This data, along with student progress, adult implementation indicators and feedback from the Department’s technical assistance providers will be used to develop the upcoming school year’s schoolwide reading plan. Schools that have been identified by the Department as “high-risk” will be provided a Reading Tiered Fidelity Inventory facilitator trained directly by the Department. All other schools will have internal

facilitators who have completed the online facilitation course through Michigan’s Integrated Behavior and Learning Support Initiative (MIBSLI).

System coaches assigned to schools, through the work of the state support teams or “high-risk” status through the Department’s subgrantee risk assessment, will engage in ongoing continuous improvement through professional learning offered by the Department and use of assessments such as the EBISS Systems Coach Self-Assessment (Jackson & Chaparro, 2014).

**Instructional Walk-Throughs and Rounds:** Local programs (all age bands) will partner with the Department and technical assistance providers to develop locally relevant walk-through forms to determine if the targeted evidence-based language and literacy strategies are being implemented with fidelity. The Department will provide guidance and criteria for the necessary components of a high-quality walk-through form. Local program walk-through forms will be approved by the Department and awarded programs will submit comprehensive training plans for use and support of the forms. Data on the use of walk-through forms will be submitted to the Department on an annual basis. The state will follow up with requests for more detailed analyses from a sample of subgrantees. Schools determined to be “high risk” based on the grant risk assessment may be asked to have external literacy specialists conduct or monitor walk-throughs to measure fidelity.

### Section C: Management Plan

**Part 1: State Implementation Plan** The Department has a plan to ensure the successful management of the proposed project. This plan includes appropriate staffing, collaboration with other entities within the Ohio Department of Education and other state agencies, appropriate budget and fiscal controls, and a detailed implementation plan.

**Collaboration with other Department Offices:** The Department is building a

collaborative effort to develop and support the implementation of this grant application. All four of the Department's major program divisions, as well as the Office of Field Relations, Office of Fiscal Services, Office of Grants Management and the Department's implementation team will collaborate on implementation. The Department also will collaborate with the Department of Job and Family Services, which is the state agency primarily responsible for early child care in Ohio. Each office will have representation on an overall Project Steering Committee exercising primary oversight of the project. The steering committee will meet biweekly at the outset.

**Staffing:** State staff support will be housed across the Department of Education and led by the Center for Teaching, Leading and Learning. Key project personnel include the following, and their resumes are attached to the application submission:

***Director of the Office of Approaches to Teaching and Professional Learning.*** Dr. Melissa M. Weber-Mayrer will serve as project director for the grant. Dr. Weber-Mayrer collaborates with Department staff and external stakeholders to coordinate the design, development and implementation of language and literacy supports for Ohio's students. She oversees literacy and the Third Grade Reading Guarantee. She holds a doctorate in reading and literacy for early and middle childhood and has a combined 20 years of professional experience.

***Literacy Unit Staff.*** The Literacy Unit, housed in the Office of Approaches to Teaching and Professional Learning, consists of staff with expertise in early, middle and adolescent literacy. This staff supports the inclusion of evidence-based approaches to teaching and professional learning to ensure the use of high-quality instructional practices for literacy improvements.

***Senior Executive Director of the Center for Teaching, Leading and Learning.*** Julia Simmerer is the senior executive director of the Center for Teaching, Leading and Learning and oversees the following offices: Office of Approaches to Teaching and Professional Learning, Learning

and Instructional Strategies, Career-Technical Education, Career Connections, Educator Effectiveness and Educator Licensure. As a member of the Department's executive management team, she will ensure strong and successful communication, collaboration and support.

**State Staff Activities:** State staff will perform the following activities:

- Coordinate and align literacy-focused activities with the Department and across regional providers, including materials, professional development and identification of resources;
- Design and develop tools and resources outlined in this proposal, including the guide for Model Comprehensive Literacy Sites;
- Staff and support the regional literacy networks as described in this proposal; and
- Design and deliver professional development supporting the implementation of evidence-based language and literacy strategies as described in this proposal.

**Budget and Fiscal Controls:** The Department has successfully implemented billions of dollars in federal grants, as well as many specific federal grants and is committed to ensuring the project is delivered on budget and in full compliance with state and federal fiscal and accounting laws and regulations. The Office of Fiscal Services and Office of Grants Management both oversee standard protocols to ensure that grant funds are expended and accounted for in full compliance with federal regulations and consistent with grant requirements. Staff from these offices are integral parts of the project team and continuously involved in grant administration.

To ensure all expenses are allowable and within budget, all subgrantees will be paid on a reimbursement basis, through the Department's Comprehensive Continuous Improvement Planning (CCIP) system, to approved grant budgets for each subgrantee. System checks are in place to ensure budget amounts are not exceeded and draws of funds are based on properly submitted expenditure reports and appropriate, approved uses of funds. Annual budget reports

and updated budget narratives will be required. Subgrantees are subject to audit by the Ohio Auditor of State. The Department will annually update monitoring processes, protocols, guidance documents and rubrics, based on feedback from program administrators and subgrantees.

**State Implementation Timeline:** In general, year one of the CLSD grant will include developing resources to guide interested applicants in developing Model Comprehensive Literacy Sites, developing and deploying a Request for Applications for subgrantees, selecting subgrantees and model sites and assessing and addressing the needs of the regional literacy networks. Years 2-5 of the grant will consist of implementation of subgrants, development of statewide resources and implementation of regional literacy networks to support scale and sustainability of evidence-based language and literacy practices showcased by the model sites.

**Part 2: Managing Key Activities** The following reflects Ohio’s detailed implementation plan for each of the main components of the project design.

***Component 1: Developing Model Comprehensive Literacy Sites (Section B, p. 10)***

***Key Activity 1- Subgrantee Pre-Application Process***

*Responsibilities:* The Department, in partnership with state support teams (described in Section D, p. 30) and regional literacy networks, will conduct a pre-application process focused on the development of local literacy plans from eligible applicants. Literacy plans are required by Ohio’s Third Grade Reading Guarantee statute and by current Striving Readers grantees, however, other districts have elected to write literacy plans to target district and building improvement efforts. The Department will provide universal support through webinars, templates and the guide for Model Comprehensive Literacy Sites (see Section D, p. 27) for applicants developing or revising literacy plans. Ohio’s 16 state support teams will provide regional support to applicants in developing and revising plans and work with eligible applicants

to evaluate readiness and fit. Department and regional staff will help interested applicants understand the grant's focus on ensuring students from low-income families, English learners and students with disabilities have access to evidence-based language and literacy instruction, evidence-based family literacy strategies and educational options. Applicants will submit their local literacy plans as part of the pre-application process.

*Milestones and Timelines:* The pre-application process will begin upon award to help build statewide capacity for improving the quality of LEA literacy plans. Local Literacy Plans will be due by Dec. 31, 2019. This date corresponds to the date in which districts qualifying for the state's required literacy improvement plans (under the Third Grade Reading Guarantee) must submit those plans. Submitted plans will be reviewed by a team comprised of early learning, literacy, school improvement and special education staff. This review will qualify applicants to proceed to subsequent steps in the process. LEAs that develop literacy plans and do not continue in the application process, or are not ultimately selected, will be well-positioned to participate in the regional literacy networks learning from the Model Comprehensive Literacy Sites.

***Key Activity 2- Subgrantee Request for Applications and Selection***

The Department has extensive and successful experience with similar processes as part of its federal Race to the Top grant, Early Learning Challenge grant, Charter School Program grant, Striving Readers Comprehensive Literacy grant and many other federal-funded grant programs.

*Responsibilities:* The Department's Office of Approaches to Teaching and Professional Learning and Office of Early Learning and School Readiness will develop the subgrantee Request for Applications (RFA). The RFA will ask subgrantees to describe their eligibility (selected schools or programs are required to meet the definition of a high-need school or program), needs, readiness, fit, integration and coordination of comprehensive literacy instruction, budget and

assurances. The offices also will develop technical assistance to support the RFA process. The Department's communications team will develop a model site webpage. The selection process will be developed by the Office of Approaches to Teaching and Professional Learning and Office of Early Learning and School Readiness based on the requirements of the RFA. Selection will be based on the quality and alignment of proposed activities compared to the guide for model sites and evidence that awarding the subgrant likely will impact the rate at which the state is able to scale the evidence-based strategies.

*Milestones and Timeline:* The Office of Approaches to Teaching and Professional Learning and Office of Early Learning and School Readiness will develop 1) a dedicated page on the Department's website with all applicable information for the grant to be developed upon award; 2) applicant webinar(s) (recorded and available online) related to aspects of the application process and evidentiary requirements for proposed model sites to be available at the release of the RFA by January 2020; and 3) documentation of answers to frequently asked questions from applicants to be released 10 days after release of the RFA.

### ***Key Activity 3- Monitoring and Providing Feedback to Subgrantees***

*Responsibilities:* Department staff from the following offices will collaborate to develop a monitoring rubric including all aspects of monitoring, as well as requirements and timelines for reporting, desk reviews (at least yearly), and on-site visits: the Office of Approaches to Teaching and Professional Learning, Office of Early Learning and School Readiness, Office for Exceptional Children, Office of Improvement and Innovation, and the Office of Fiscal-Grants Management. These offices also will provide continuous feedback to the subgrantees via multiple means of communication, including a Department-created, online monitoring tool; regular email; phone communication; and on-site, face-to-face conversations.

*Milestones and Timeline:* The Department will monitor continuously and provide feedback to subgrantees regarding (1) fidelity of implementation and plan alignment, (2) performance on literacy plan goals and objectives, and (3) fiscal accountability based on the rubric developed. The rubric is estimated to be available in February 2020 and will be updated annually. Desk reviews will take place at least once each grant implementation year for all subgrantees and random on-site visits will be conducted in the spring of each grant implementation year.

Subgrantees will be required to file final grant activities reports within 90 days of the end of the budget period. Subgrantees must, at a minimum, report on each project goal and outcome (using defined performance measures) and provide a detailed expenditure report. The Department will specify a format for expenditure reports and ensure that reported goals and outcomes are consistent with those specified in the grant application.

The Department will review each subgrantee's annual grant activities report and notify the grantee of the report's acceptability and compliance. Should additional information be required, the Department will specify missing information and request report revisions. Subgrantees found to be non-compliant or deficient on any required items will be requested to provide information, immediately rectify the compliance issue or identify a corrective action plan. Subgrantees will be given 30 days to correct deficiencies. Failure to correct all deficiencies may result in early termination of the subgrantee's award and, depending on the circumstances, the Department may pursue necessary actions to reclaim previously distributed funds.

## ***Component 2: Enhancing Regional Literacy Networks (Section B, p. 10)***

### ***Key Activity 1- Needs Assessment for Regional Literacy Networks***

*Responsibilities:* The Office of Approaches to Teaching and Professional Learning will develop a needs assessment survey to gather information on the successful implementation of the existing

16 regional literacy networks. The state support team network will submit the survey to the Office of Approaches to Teaching and Professional Learning for analysis.

*Milestones and Timeline:* The Office of Approaches to Teaching and Professional Learning will introduce the needs assessment to Regional Support Teams for Literacy in fall 2019.

Administration of the needs assessment survey will take place November 2019-January 2020 and submitted to the Department in January 2020. Results will be analyzed by the Department in February/March 2020 to inform implementation in year 2 of the grant. Regional networks will revisit and re-examine the needs assessment as needed throughout the grant.

### ***Key Activity 2- Implementing Regional Literacy Networks***

*Responsibilities:* The Office of Approaches to Teaching and Professional Learning, Office of Early Learning and School Readiness, and Office for Exceptional Children will use the results of the needs assessments to guide the State Literacy Network's planning of the Regional Support Teams for Literacy in implementing 16 effective regional literacy networks. Network will be led by the regional early literacy specialist and state support team or educational service center staff.

*Milestones and Timeline:* Results of the needs assessment will be shared with the State Literacy Network in spring of 2020. The State Literacy Network will use results for implementation purposes beginning in fall 2020 to inform practices to build statewide capacity. The 16 regional literacy networks will develop implementation plans by spring of 2021 to utilize the Comprehensive Literacy Model Sites to foster implementation of evidence-based literacy practices across network members. Implementation of regional networks to scale the practices from model sites will begin in fall 2020 or 2021, depending on the needs of the network.

### ***Component 3: Developing Statewide Resources (Section B, p. 11; Section D, p. 30)***

## **Key Activity 1- Developing Universal and Targeted Training and Technical Assistance Statewide**

*Responsibilities:* The offices of Approaches to Teaching and Professional Learning and Early Learning and School Readiness will develop statewide resources to support implementation of evidence-based literacy strategies for all students, as described in Section D (p. 30).

*Milestones and Timeline:* Prior to releasing the RFA, the Department will release and provide support around the components of Model Comprehensive Literacy Sites and the development of a Local Literacy Plan (fall 2019). Training on Ohio's coaching models (peer and traditional), the Reading-Tiered Fidelity Inventory and the Ready Schools Literacy Transition Plan will be developed and deployable upon announcement of subgrantee awards and site identification (expected spring 2020). Additional courses for in-service educators, coaches and administrators, along with website resources, will be developed by the conclusion of the grant, as the courses will be informed by experiences of the subgrantees (fall 2020-spring 2024).

### **Part 3: Procedures for Ensuring Feedback and Continuous Improvement**

**State-Level Performance Feedback and Continuous Improvement** Through the Striving Readers grant, Ohio learned there is a need for targeted and integrated technical assistance teams, as opposed to one technical assistance provider assigned to a subgrantee who may have expertise in one area but not all. The Department will provide technical assistance teams, based on the needs identified in a risk assessment, to each subgrantee to ensure adequate support for the development and implementation of comprehensive literacy systems; implementation of evidence-based language and literacy instruction, strategies to support families; and fiscal support. Teams will be comprised of Department staff and staff from Ohio's 16 state support teams when are already working with subgrantees at the program, district and/or building level.

Ohio will collect the local data described above directly from subgrantees and leverage already-collected state-level data (for preschool through grade 12) to inform continuous improvement and evaluate the effectiveness and impact of local projects. Key state-level evaluation questions and data sources are listed below. All subgrantees will collect information locally and report information through an electronic data portal.

**Measuring teacher and administrator capacity for effective language and literacy**

**instruction** Researchers have revealed significant links between student reading achievement and teacher knowledge and practice (Foorman & Moats, 2004; Spear-Swerling & Brucker, 2004). All administrators, coaches and teachers will participate in Department-identified pre- and post-assessments of evidence-based language and literacy strategies relevant to the age bands they serve. The post-assessment will be administered twice throughout the grant (at the end of year 2 and at the end of year 5). These assessments will be used to illustrate gains in educator knowledge and the effectiveness of professional learning. Correlations will be examined to determine impact of gains in educator knowledge.

**Measuring the fidelity of implementation of evidence-based language and literacy**

**strategies** Ohio will analyze the results of the Ready Schools Literacy Transition Plan for birth-kindergarten entry subgrantees and the Reading Tiered Fidelity Inventory for kindergarten through grade 12 subgrantees. Ohio will analyze the results of instructional walk-throughs rounds to support subgrantee improvement and inform statewide resources.

## Section D: Project Services

**Part 1: Operationalizing the Project Design** As part of Ohio’s project design, a number of project services are planned to have an impact on program participants.

**Support for Model Comprehensive Literacy Sites** The CLSD grant will allow Ohio to operationalize the evidence-based strategies outlined in Ohio’s Plan to Raise Literacy Achievement. These evidence-based strategies support both systems (for example, use of screening assessments, progress monitoring tools and tiered instruction) and instruction (such as explicit and systematic instruction in phonemic awareness, phonics, fluency, vocabulary and comprehension) and are proven to be effective with children who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, or age, including children from low-income families, English learners and students with disabilities.

In partnership with national and state experts (the Department has previously partnered with Dr. Tim Shanahan, Dr. Anita Archer, Dr. Mel Riddile and Dr. Carol Tomlinson), the Department will develop a **guide for Model Comprehensive Literacy Sites** that provides all districts and schools information and examples on implementing evidence-based language and literacy practices to support equitable systems and high-quality instruction birth-grade 12. Components of the Model Comprehensive Literacy Sites will be based on Ohio’s Theory of Action, described in Ohio’s Plan to Raise Literacy Achievement: shared leadership, multi-tiered systems of support, teacher capacity to implement comprehensive literacy instruction, family partnerships and community collaboration.

Through the State Personnel Development Grant, Ohio has previously tested the **Integrated Comprehensive Systems (ICS) approach** to ensure *all* learners have access to the services available at the Model Comprehensive Literacy Sites. This approach was developed to support

educational leaders in promoting equity by transforming a system, as opposed to approaching equity in silos, only focusing on one aspect of equity (for example, culturally relevant pedagogy) rather than the whole (Frattura & Capper, 2014). This approach has been used in several regions of the state to support the shared leadership approach of the Ohio Improvement Process.

ICS addresses a full range of inequities, including race, ethnicity, social class, ability and gender, includes an equity measure for continual improvement feedback and intentionally focuses on reallocation of resources to ensure equitable distribution within current levels. Department and regional literacy staff hosted a yearlong series throughout school year 2019 to train regional staff from state support teams and educational service centers in applying the fundamental principles of ICS to evidence-based language and literacy strategies. Continued training in the ICS approach is an important element of the project design proposed in this application and will allow the state and regional entities to support model sites in ensuring equitable access to instruction and literacy systems for all learner.

In addition to ensuring the strategies and components utilized by model sites provide equitable access to all learners, the Department is committed to selecting and supporting sites that will showcase the use of these strategies with learners that represent the diversity of the state, with a focus on students from low-income families (see subgrantee eligibility, p. 22), students attending rural schools, students who are English learners and students with disabilities.

**Support for Applicants that are Rural Schools:** Four of Ohio's 16 regions include 73 percent of the rural districts in the state, and each of these regions will host model sites and regional literacy networks. These networks will be leveraged in the pre-application process to ensure support for applications from rural schools, as well as during implementation to support scaling practices throughout the regions. The Department already is engaged in specific supports

designed to help ensure equity for Ohio's rural districts. These supports are designed based on a specific understanding of the unique geographic and cultural landscape of the region recognized as Appalachian Ohio, which includes all 160 districts primarily in southeast Ohio.

**Support for Applicants Serving Students who are English Learners:** Through its Design, Ohio's project will enhance support for applicants serving students who are English learners through Department resources, as well as external partnerships. The Department provides an array of technical assistance and professional development to educators throughout the state regarding English learners. Through dedicated state staff members of the Department's Lau Resource Center, longstanding relationships with professional organizations, like Ohio TESOL and regional networks of English learner program administrators and teachers, the Department is well-poised to identify and serve applicants in need of support the grant provides.

**Support for Applicants Serving Large Numbers of Students with Disabilities:** The foundational design of the CLSD project is rooted in the State's Systemic Improvement Plan to improve literacy outcomes for students with disabilities. Now in year 3 of implementation, activities are informing the evidence-based practices chosen by the Department, the design of the Model Comprehensive Literacy Instruction Sites, and the selection and support of these sites.

**Enhancements of Regional Literacy Networks** Ohio districts and schools are supported by a Statewide System of Support that includes 16 state support teams. Each state support team includes a regional literacy network. These networks are not identical but reflect the needs of the districts and schools in the region that have chosen to engage in the work. Consistent throughout the networks is leadership from regional literacy specialists who are engaged in the State Literacy Network and have been extensively trained in evidence-based language and literacy strategies that support both equitable system implementation and high-quality instruction. To

design enhancements for the networks, each regional literacy network will engage in a needs assessment drawing out strengths and areas for improvement. The needs assessment will inform: activities provided across the State Literacy Network, supports for individual networks and provide information to the Department on scalable activities across networks.

**Statewide Training and Technical Assistance** Ohio proposes training and technical assistance services to improve the implementation of evidence-based language and literacy practice across the state. Training and technical assistance is available in three forms: universal, targeted and intensive. Activities described below represent training and technical assistance directly supported through the proposed CLSD grant but do not reflect the full scope of training and technical assistance provided through Ohio’s Plan to Raise Literacy Achievement.

**Universal Training and Technical Assistance** will be available to CLSD subgrantees and available to other LEAs across the state. State-level activities under the CLSD grant supporting universal training and technical assistance will include:

- State Literacy Academy: Enhancing and growing the state’s annual birth through grade 12 literacy academy to include more LEAs from across the state, enhance the peer networking component, develop understanding of the components of comprehensive literacy instruction birth through grade 12, showcase Model Comprehensive Literacy Sites and provide additional access to sessions through enhanced technology;
- Resources and Materials: Producing resources and materials to develop understanding of and alignment to Ohio’s Plan to Raise Literacy Achievement;
- Courses: Developing courses for in-service educators, administrators and coaches on evidence-based language and literacy strategies identified in Ohio’s Plan to Raise Literacy Achievement for birth-grade 12 including instructional coaching; and

- **Web-based Resources:** Enhancing resources on the Department’s website based on the learning occurring in participating schools and early childhood sites.

**Targeted Training and Technical Assistance to CLSD Subgrantees** will be available to LEAs participating in the CLSD grant. These opportunities will be provided to subgrantees throughout the grant period and may be available to educators outside of participating schools and early childhood education programs that are served by the LEA subgrantee. These include:

- **Training in Ohio’s Peer Coaching Model for Literacy Instruction** The Department has developed and piloted a peer coaching model for literacy instruction during the 2019 school year through the State Personnel Development Grant. The Department will revise components of the training based on the external evaluation of those activities and use CLSD funds to develop a course in the Department’s Learning Management System for use by subgrantees. This course uses a facilitator model, allowing for feedback and interaction between participants focused on reflection and improvement.
- **Training in Ohio’s Traditional Coaching Model for Literacy Instruction** The Department piloted a traditional coaching model during the 2019 school year based on the work of Jim Knight through the SSIP. The Department will develop a course based on the feedback from pilot districts and the external evaluation of the SSIP in the Department’s Learning Management System for use by subgrantees. This course will use a similar facilitator model as the peer-coaching model.
- **Training and Support for the Facilitation of the R-TFI** The Office of Approaches to Teaching and Professional Learning will provide training and support to subgrantees for the facilitation of the Reading Tiered Fidelity Inventory for K-12 subgrantees.

- **Training and Support for the Facilitation of the Ready Schools Literacy Transition**

**Plan** The Office for Early Learning and School Readiness will provide training and support to birth-kindergarten and K-5 subgrantees by facilitating the Ready Schools Transition Plan and promoting collaboration birth through school entry.

**Intensive Training and Technical Assistance to CLSD Participating Schools and Early**

**Childhood Education Programs** will be available to **select** schools and early childhood education programs based on the risk assessment conducted by the Department and ongoing continuous improvement efforts throughout the grant. Aligned to Ohio’s Theory of Action, this training and technical assistance will include on-site, need-specific support that may include training and support in the components of comprehensive language and literacy instruction, implementing a multi-tiered system of support for reading (Section C, p. 16), implementing evidence-based family literacy strategies, or capacity for building administrators and/or coaches.

**Part 2: Likely Impact of Services Provided by Proposed Project** Ohio’s proposed project has been developed based on the results and lessons learned through recent state literacy initiatives (Ohio’s Early Literacy Pilot, the State Personnel Development Grant, Striving Readers Comprehensive Literacy Grant), as well as past literacy initiatives (Ohio’s Preschool Literacy CORE and Teacher Leader Project, Assessing Preschool Professionals Learning Experiences and Reading First Ohio). The project is premised on the diffusion of innovation theory, explaining how ideas and practices gain momentum and spread throughout systems (Rogers, 2003). This theory supports the idea that most entities will not try something unless someone else has done it first (Sinek, 2009). Therefore, there must be opportunities for districts and schools to see the evidence of the success and effectiveness of the practices outlined in Ohio’s Plan to Raise Literacy Achievement. This project will allow the Department to present evidence to large

numbers of educators through networking and firsthand experiences, which are necessary for taking practices to scale statewide.

Ohio has focused on improving literacy outcomes for many years. In 2012, Ohio passed legislation to codify practices like screening and intervention in kindergarten through grade 3 with Ohio's Third Grade Reading Guarantee. Though there have been stories of success throughout the state, it is clear from Ohio's needs assessment (Section A) that more targeted, intensive work is needed in Ohio to raise literacy achievement. This targeted and intensive work has been underway since the inception of the Ohio's Early Literacy Pilot in 2016. This pilot includes 15 districts that increased the percentage of participating students on track in reading by 6 percent in grade 1, 10 percent in grade 2 and 4 percent in grade 3 after the first two years of implementation (school years 2017 and 2018). Additionally, there was a 6 percent increase in the percentage of students scoring proficient or higher on the state assessment in grade 3 English language arts. In a short period of time, this pilot has transformed the conversation around the Third Grade Reading Guarantee and literacy instruction in Ohio from one of legislative compliance to a robust dialogue on evidence-based language and literacy instruction.

This transformation occurred rapidly because it was not based in what policymakers or researchers *said* but what school administrators, educators and coaches *did* to raise expectations and student achievement. For example, one instructional focus of the pilot was to promote evidence-based instruction in phonemic awareness in preK-grade 3. This was first attempted through professional learning for educators, administrators and coaches. Based on performance feedback, it was determined that most pilot districts needed supplementary instructional materials to implement the instructional strategies. After introducing supplementary materials, there was an immediate 5 percent increase in the percentage of kindergarten students scoring at

or above benchmark on the curriculum-based measures of phonemic awareness. As the pilot nears the end of its third year, many districts have independently decided to replicate pilot components, including training more than 3,000 preK-grade 3 educators in the supplemental phonemic awareness materials. This immediate replication and impact was not anticipated but is now informing the continuous improvement efforts at the Department.

A second lesson learned through Ohio's Early Literacy Pilot is the importance of *readiness* and *fit*. The intensity of services and resources required by pilot districts and schools has varied greatly based on the readiness of the participating districts and schools and fit of the activities being evaluated. Developing model sites throughout the state in a five-year period will require careful consideration of the readiness and fit of the participating sites. These factors are built into the management plan (p. 21) to increase the likelihood of success of these model sites and increase the impact of the project on the state as whole.

In addition to the Early Literacy Pilot, Ohio was awarded and currently is implementing a Striving Readers Comprehensive Literacy Grant. During school year 2019, Ohio has reached 155,000 children birth-grade 12 through this grant. The activities and intensity of services vary greatly among the 46 subgrants (reaching more than 150 LEAs) and thus so do the outcomes for all children served. Ohio now is positioned to learn from the diverse activities of the Striving Readers subgrantees and the scalability of practices from the Early Literacy Pilot to develop a highly impactful CLSD project. Thus, more narrowly focused in approach than the Striving Readers Grant, the CLSD project's potential impact is far greater.