



Striving Readers Comprehensive Literacy Written Public Input

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From: Kimberly Freehan [kafreeha@mpsaz.org]
Sent: Monday, November 15, 2010 12:04 PM
To: Striving Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

How can subgrantees ensure that the needs of children from birth through age five will be met under this program? How should subgrantees create effective partnerships with relevant organizations, including the State Advisory Council on Early Childhood Education and Care?

Arizona has many systems that support the needs of children from birth through age five. Our early childhood community meets monthly as a consortium and would be an excellent partnership for information and collaboration. This consortium includes members of the public school community that provide services to both children identified with special needs and typically developing children. Additionally, our state's tobacco tax that is dedicated to services for children from birth through age five, First Things First, has a far reaching system of community participants who have already identified needs in their communities and could refer individuals for participation and collaboration.

Arizona currently has a Department of Education Division of Early Childhood and Head Start Collaboration that could effectively monitor, collaborate and provide information.

How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

A comprehensive literacy plan that effectively addresses the needs of all children will be respectful of the abilities the child brings to the program and will acknowledge that the younger the learner, the more important the literacy connection to real life experiences and events in the child's life. Young children need field trips, presentations, and real materials to link experiences with vocabulary and reading experiences. An effective program will provide for these "hands-on" experiences in addition to high quality instruction and literacy materials.

--

Kim Freehan
Early Childhood Specialist
Community Education

From: phouse@qci.net on behalf of Posie Boggs [phouse@qci.net]
Sent: Monday, November 15, 2010 4:01 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: The Striving Reader's Comprehensive Literacy Program

Dear Secretary of Education,

Please fully support The Striving Reader's Comprehensive Literacy Program at all levels of activity and funding.

Lack of Reading instruction for teachers of reading at our Universities is pathetic.

Learning and becoming a reader is the most important civil right we have in America, and we are *Failing* miserably at teaching this basic skill!

When our great country is in shatters because of an uneducated populace, we will deserve being overrun by a foreign power or even a drug cartel!

Teach our children to READ by any means that *they* need. Ensure our teachers of reading know how to teach reading *not* how to defend the politics of the Reading Wars. Engaging in the Reading Wars is a betrayal of our kids. Fund this program to force change in Higher Ed Departments of Education and force them to graduate teachers who have the tools to teach reading to all kinds of learners.

Please do not allow ignorance about good reading science and instruction to betray our kids any longer.

Posie Boggs

Parent of 4 Struggling Readers due to *Dysteachia*

From: Kathleen Brown [Kathleen.Brown@utah.edu]
Sent: Monday, November 15, 2010 7:45 PM
To: Striving.Readers.Comprehensive.Literacy
Cc: uurc-it@lists.utah.edu
Subject: "Striving Readers Public Input"

SEA and LEA Capacity and Support

1. What should States be considering in their State Literacy Plans to ensure effective literacy and language development and instruction? For example, what are core components of a State Literacy Plan?

Based on research, components should include: phonological awareness, phonics, spelling, vocabulary, oral language, comprehension, fluency, writing. Word-level processes (i.e., phonological awareness, phonics, spelling, vocabulary) require a clear scope & sequence, and systematic, explicit instruction with mastery assessment. Higher level processes (i.e., comprehension, writing) do not require a sequence, but do require a scope of what should be taught in a spiraling curriculum across the grades.

What roles and capacities should States have or develop in order to effectively support subgrantees in carrying out substantial improvements in literacy and language development, teaching, and learning?

Capacity to effectively evaluate subgrantee proposals and educator/student outcomes on valid, reliable assessments administered pre/post.

Capacity to discern the difference between implicit and explicit phonics/p.a./spelling programs.

Capacity to identify a comprehensive, well-sequenced phonics/p.a./spelling program that leads literacy development in a manner consistent with scientifically-based reading research.

Capacity to identify mentored, intensive professional development with real, live breathing children that helps educators internalize critical developmental benchmarks and instructional routines in literacy. I want to be clear that I am not supporting Reading Recovery here. While I see some strengths in its professional development model, its instructional content is not based in scientific research, and in fact, flies in the face of what we

know about word reading development. Moreover, RR's service pattern of 1-on-1 via certified teachers is financially unrealistic for most schools.

2. How can this program most effectively support States' and LEAs' transition to new internationally-benchmarked college- and career-ready standards held in common by multiple States, as well as their use of State early learning standards?

See above. If the states can't lead with regard to these standards, the districts can't follow. When the states can't lead, educators end up with the same watered-down, "get it done in a weekend," drivel that has passed for professional development in many places for decades. The drivel results in an instructional status quo in the classroom which negatively impacts struggling readers.

3. How can SEAs and subgrantees best leverage the use of funds under the ESEA, the Individuals with Disabilities Education Act, and the Perkins Career and Technical Education Act, as well as other Federal, State, and local funds, for effective literacy development and instruction?

State superintendents need to mandate that program officers work together and from the same principles. Otherwise, the left hand doesn't know what the right hand is doing in the state offices. Then, see 2 above.

Transition and Alignment across Birth through Grade 12

1. How should States and LEAs assess their needs in order to effectively target the funds to appropriately support literacy and language development for children from birth through grade 12?

Enough with the assessments of need! We know that close to 40% of American 4th graders do not read well enough to complete grade level academic tasks. Rather, just look at the number of free/reduced lunch percentages per school and fund commensurately.

2. How can subgrantees ensure that the needs of children from birth through age five will be met under this program? How should subgrantees create effective partnerships with relevant organizations, including the State Advisory Council on Early Childhood Education and Care?

I do not have expertise in this area.

3. How can subgrantees ensure that the needs of adolescent learners will be met under this program? Specifically, how can subgrantees ensure that schools integrate effective literacy development and instruction into core subject areas and increase motivation and interest in reading and writing?

Break the gridlock of secondary school scheduling. In most secondary schools, it is extremely difficult to free struggling readers for intervention. After-school programs help, but many secondary students work and cannot take advantage of those opportunities.

Meeting the Needs of Diverse Learners

1. How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

Ensure plentiful, relentless outcome-driven, Tier 2 and Tier 3 intervention during school, after school, and during the summer.

Ensure ongoing, intensive scientifically-based professional development in reading for all educators (regular ed., special ed., para-educators, and administrators). Once some content is in place, ensure classroom application with coaching and reteaching as needed.

2. How can a State ensure that subgrantees will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

See above

3. What should subgrantees consider when addressing the needs of their diverse learners across the age spans?

The benchmarks of literacy development. Chronological age is almost irrelevant in planning reading intervention.

Professional Development, Instruction, and Assessment

1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful subgrant proposal?

Scientifically-based, theoretically driven content that focus on the benchmarks of reading development assessed by mastery assessment.

Ongoing, intensive clinical practica that provide mentoring and coaching.

2. In what ways can technology and materials conforming to principles of universal design for learning (UDL) support effective literacy development and instruction for limited-English-proficient children and youth and children and youth with disabilities? What aspects of technology and UDL should be considered for incorporation in subgrant proposals?

I do not have expertise in this area.

3. What are the critical elements of an integrated, age-appropriate assessment system for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?

(K – 6) Screen & progress-monitoring of component skills (e.g., nonsense word fluency)

(students with K – 2 reading levels) Beginning & end of year assessment of instructional reading level based on oral reading accuracy & fluency to place students in developmentally appropriate groups for instruction and to measure progress. Must be done individually.

(students with 3 – 8 reading levels) Beginning & end of year assessment on a timed, cloze procedure comprehension test to place students in developmentally appropriate groups for instruction and to measure progress. May be conducted with whole class.

4. What are the most important ways to collect, analyze, and use data to improve literacy development and instructional practices and child and youth outcomes in early learning settings and in schools?

Mandate the use of reliable, valid, efficient measures to screen, identify instructional level, and progress-monitor (e.g., DIBELS, some research-validated IRIs, STAR test). More fine-grained subtests may be used when diagnosis is warranted (e.g., TOWRE, RAN/RAS).

Evidence and Evaluation

1. In order to have a rigorous competition and make high-quality subgrant awards, what evidence should States require subgrantees to put forward in their applications? How can early learning providers demonstrate a "record of effectiveness," as required in the Act?

Programs featured in proposal must have, and/or be based on scientifically-based research. Evidence of such should be required in proposal, with full citations.

Those who conduct professional development with educators must be able to provide evidence of extensive education/training and references for specific areas (e.g., intervention, early literacy).

2. What approaches should States and subgrantees implement in order to effectively monitor program implementation and outcomes so as to inform continuous program improvement?

I do not have extensive expertise in this area, but sending program officers and administrators out to the field unannounced would help keep people on their toes.

3. What strategies should States and subgrantees implement in order to monitor and evaluate the effectiveness of job-embedded, ongoing professional development for teachers, coaches, principals, and administrators?

Conduct assessments of educators' content knowledge and classroom application at pre/post. Reteaching and additional coaching should be provided for those who cannot perform at mastery.

4. What should the Department require regarding rigorous, independent State evaluations of the program, given limited State-level administrative funds?

I do not have expertise in this area.

Sincerely,

Dr. Kathleen J. Brown, Director

University of Utah Reading Clinic

From: jean public [jeanpublic@yahoo.com]
Sent: Tuesday, November 16, 2010 9:46 AM
To: DEBORAH.SPITS@ed.gov; Striving.Readers.Comprehensive.Literacy;
AMERICANVOICES@MAIL.HOUSE.GOV; COMMENTS@WHITEHOUSE.GOV;
SF.NANCY@MAIL.HOUSE.GOV; RUSH.HOLT@MAIL.HOUSE.GOV
Cc: INFO@TAXPAYER.NET; MEDIA@CAGW.ORG; INFO@THETEAPARTY.ORG
Subject: PUBLIC COMMENT ON FEDERAL REGISTER Fw: spending ed funds on illegal immigrant
kids who should be paid under mexican, chinese, etc. laws

THIS IS A TOTALLY WASTEFUL PROGRAM. THIS PROGRAM IN FACT PUNISHES AMERICAN TAXPAYERS TO EDUCATE KIDS FROM SNEAKING PARENTS WHO SNEAKED INTO THIS COUNTRY. IT IS TIME THAT ALL ILLEGAL IMMIGRANTS AND THEIR KIDS LEAVE AMERICA AND LET THEIR OWN COUNTRY PAY TO EDUCATE THEM. THE TAXPAYERS OF THIS COUNTRY ARE MAD ABOUT BEING ROBBED TO PAY FOR ALL THE KIDS WHO SNEAK INTO THIS COUNTRY FOR EDUCATION. WE SHOULD BE RESPONSIBLE FOR AMERICAN KIDS, NOT EVERY SNEAKING PERSON WHO COMES HERE ILLEGALLY. THIS DEPT IS DOING ABSOLUTELY NOTHING TO HELP IN THIS SITUATION TO HELP AMERICAN CITIZENS, EXCEPT TO ROB THEM WITH THESE PROGRAMS THAT ARE TOTALLY WASTEFUL. THIS PROGRAM SHOULD BE SHUT DOWN AND TOTALLY DEFUNDED.

THE ILLEGALS SHOULD BE DEPORTED. AMERICAN CITIZENS ARE SICK AND TIRED OF SUPPORTING THEM. HOW ABOUT CUTTING ALL PROGRAMS FOR ALL ILLEGAL KIDS AND SEEING THAT THEY AND THEIR PARENTS GO BACK TO THEIR OWN COUNTRIES FOR BENEFITS, INSTEAD OF SAYING THAT AMERICAN TAXPAYERS SHOULD BE ROBBED TO PAY FOR THESE SNEAKS.

THIS PROGRAM IS THE RESULT OF FAT CAT BUREAUCRATS WITH HIGH SALARIES AND BENEFITS KNOWING NOTHING ABOUT ORDINARY AMERICA ANYMORE. YOU ALL MAKE SO MUCH YOU HAVE NO IDEA WHAT IS BEING ROBBED IN TAXES ANYMORE.

JEAN PUBLIC 8 WINTERBERRY COURT WHITEHOUSE STATION NJ 08889

From: Elaine Cheesman [echeesma@uccs.edu]
Sent: Wednesday, November 17, 2010 2:27 PM
To: Striving.Readers.Comprehensive.Literacy
Cc: echeesma@uccs.edu
Subject: Striving Readers Public Input

Professional Development, Instruction, and Assessment

1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful subgrant proposal?
 - a. Literacy-related professional development must center on aspects identified by scientific evidence as essential for developing literacy skills: areas for developing the ability to read and spell words (phonemic awareness and morphological awareness; *systematic, explicit* phonics for both decoding and spelling; fluency with connected text) and areas for obtaining meaning from text (vocabulary, comprehension, and composition skills).
 - b. A systematic program of supervised practice in each skill is also essential.
 - c. Objective measures of pre- and post-instruction content knowledge should be a requirement for proposals.
 - d. Formal observations using a rubric or other objective measure to ensure quality should also be a requirement for successful proposals.
 - e. Evidence of change in student achievement over a period of several years. In other words, professional development programs should provide solid evidence that student reading and writing abilities improve over time and that this improvement endures after teacher professional development.

My line of research with teacher candidates in special education licensure programs shows that very few would-be teachers have requisite skills without explicit instruction and supervised practice. Teachers are not born with the requisite skills to understand the structure of language and how to teach reading and writing, particularly to students who struggle with literacy acquisition. My experience in professional development shows that, without accountability and observations, there can be no real change in teacher knowledge or pedagogical skill, and thus, little change in student achievement outcomes.

Best regards,

Elaine Cheesman

Elaine Cheesman, Ph.D.

Assistant Professor of Special Education

University of Colorado at Colorado Springs

From: DEBORAH RICKARDS [darickards@caddo.k12.la.us]
Sent: Wednesday, November 17, 2010 2:41 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: Grant input

To whom it may concern:

As you prepare guidelines, please consider the following:

1. Flexibility for states in how the money is disbursed
2. Flexibility for states in how they categorize their literacy plans (e.g., some states may have a birth-3 category, while others may have a birth-PK)

Thank you,

Debbie Rickards, Ph.D.
Louisiana Reading Association President-Elect
Shreve Island Elementary School Instructional Coordinator

From: Ron Montoya [rmont@interact.ccsd.net]
Sent: Wednesday, November 17, 2010 2:51 PM
To: Striving Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

How can subgrantees ensure that the needs of adolescent learners will be met under this program? Specifically, how can subgrantees ensure that schools integrate effective literacy development and instruction into core subject areas and increase motivation and interest in reading and writing?

Thank you for this opportunity to provide input on the Striving Readers Comprehensive Literacy program. I am the principal of Valley High School in Clark County Nevada.

In 2009, Valley High School was the first school in Clark County to be designated a “High Achieving Exemplary Turnaround School” under the federal No Child Left Behind Act (NCLB). Valley was a school that failed to meet NCLB’s academic requirements for at least three years before demonstrating significant improvement and meeting reading performance benchmarks for two consecutive years. Now, over 90 percent of students meet or exceed the standards – they come to school engaged, motivated, and ready to learn!

Valley is a diverse school with a high transfer rate serving more than 3,000 students – over 80 percent minority and 47 percent low income – in grades 9-12. More than 60 percent of Valley’s student population is Hispanic, and close to half qualify for free/reduced lunch. Ninth graders arrive from middle school, often lacking the literacy skills necessary to be successful in high school let alone higher education. Studies have shown that students who are poor readers in high school slowly become disenfranchised and dropout –more than 7,000 students dropping out of high school each day nationwide. With literacy development a critical factor of school turnaround, Valley High School’s graduation rate is now 60 percent compared to 42 percent four years ago. The dropout rate is 5.5 percent and average daily attendance is 91 percent.

What created this transformation from a “failing” to a “high achieving” school in less than five years? After reviewing the assessment data and realizing our students were at risk of failing, we recognized a new and comprehensive approach was needed to improve reading skills and pass proficiency exams. Valley High School’s literacy improvement plan included the following elements:

- Assessment that pinpoints students’ literacy deficiencies and strengths; Research-based literacy intervention to accelerate students’ reading achievement;
- Data to benchmark and monitor student literacy performance;
- Professional development to support educators in reading instruction;
- Small learning communities to give students more individualized attention; Tutoring programs and summer programs to foster literacy skill development; School culture initiatives to boost student morale and decrease teacher turnover;
 - Customized educational planning focused on increasing special education, English learner, and non-proficient students’ reading achievement; and Fundamental skill development to improve reading performance on the state test.

The critical component of our comprehensive literacy strategy was the reading intervention program that blends teacher-led classroom instruction, technology and print to meet the needs of struggling

readers. The program promotes whole-group and small-group instruction, individualized practice, differentiated skill building, and modeled and independent reading.

Partnering with our literacy provider, we facilitate training and support through on-site coaching; build capacity by training our classroom coordinator and other literacy leaders; identify key performance indicators; and conduct monthly program data reviews to monitor progress, highlight successes, and resolve challenges.

Valley High School's turnaround success story can be attributed to continued and intensive literacy development throughout the high school years. Including the strategy outlined above into the requirements for the Striving Readers Comprehensive Literacy Program will enable more high schools to address low achievement and reading proficiency rates.

Ron Montoya, Principal
Valley High School

November 18, 2010

Dr. Thelma Melendez de Santa Ana
Assistant Secretary for Elementary and Secondary Education
U. S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Attention: Striving Readers Comprehensive Literacy Program: Comments from the National Parent Teacher Association (National PTA)

Dear Assistant Secretary Melendez:

As the nation's largest, volunteer child advocacy association, the National Parent Teacher Association (National PTA) has had a significant impact on improving the education and well-being of America's children for 114 years. During this time, National PTA championed the efforts to defeat polio, led the campaign for child immunizations, supported school desegregation, ensured school children had hot school lunches, and worked to improve the nation's juvenile justice system. Currently with over 5 million members and 24,000 local units, National PTA continues to be a powerful voice for all children by developing meaningful family engagement programs and policies that will improve student achievement.

Research demonstrates that family engagement in education closes the achievement gap. Effective family engagement improves student achievement and reduces the dropout rate, regardless of parents' education level, ethnicity, or socioeconomic background.ⁱ Family engagement in education is also cost effective; it can raise student academic achievement so substantially that schools would need to increase spending by more than \$1000 per pupil to gain the same results.ⁱⁱ

The National PTA appreciates the opportunity to submit comments the Striving Readers Comprehensive Literacy Program. We offer our recommendations to strengthen the impact of the program and to assist the Department in leveraging systemic family engagement to achieve positive outcomes.

SEA and LEA Capacity and Support

Response to Question 1 (State Consideration in State Literacy Plans):

Recommendation: We recommend that in order to strengthen the impact of the Striving Readers Program, the Department require family engagement as a “core component” of the State Literacy Plan.

Rationale: A recent study by the University of Chicago identifies family engagement as one of the five “key ingredients” of school improvement, as important as teacher capacity and curriculum alignment.ⁱⁱⁱ Families play a critical role in improving literacy, by supporting learning at home and reinforcing standards outside of the classroom. Prioritizing family engagement would facilitate the development, implementation, and evaluation of best practices in the field and encourage collaboration between nonprofits and LEAs to take promising practices to scale.

Transition and Alignment across Birth Through Grade 12

Response to Question 1 (Assessing the Needs of Children from Birth to Grade 12):

Recommendation: States and LEAs should align developmental milestones and standards with appropriate outcome measures and partner with families and community-based organizations to improve the alignment, collaboration, and transitions between early learning programs and in kindergarten through grade 12.

Rationale: Research has demonstrated that engaging the families of young children is critical to their success later in life.^{iv} Supporting the literacy skills of family members *as well as* their children allows them to meaningfully engage in improving their children’s early literacy skills that are critical to academic achievement.

Meeting the Needs of Diverse Learners

Response to Question 1 (Ensuring a Comprehensive Literacy Plan to Address the Needs of Disadvantage Children and Youth):

Recommendation: States must address the unique learning needs of students with disabilities and the linguistic and academic needs of limited English proficient students by engaging families.

Rationale: Research shows that family engagement can improve student achievement regardless of parents’ education level or socioeconomic background.^v These efforts will build capacity to improve student achievement for these groups of students in all learning settings.

Professional Development, Instruction, and Assessment

Response to Question 1 (High Quality Literacy-Related Professional Development/Effective Sub-Grant Proposal):

Recommendation: Schools and districts should include multiple stakeholders, including parents and families in the development of evaluation systems for teachers and principals.

Rationale: A recent study identifies teachers' relationships with parents as a key factor in teacher retention and stability.^{vi} Providing student achievement and student growth data to teachers, principals, and families, including estimates of individual teacher impact on student achievement, is key to driving education reform through improvements in classroom instruction and strategies for families to support student learning at home.

Evidence and Evaluation

Response to Question 1 (Required Evidence and Demonstration of Effectiveness):

Recommendation: A successful sub-grant proposal should include a written statement of a sub-grantee's ability to demonstrate sustainability through support from and partnerships with family members, parent teacher associations, and community-based organizations.

Rationale: Families play an essential role in the education of their children and are critical partners in ensuring the project's long term success. Sub-grantees should be required to work with key stakeholders in their communities to ensure that their project meets local needs and builds the capacity and public will that will ensure sustainability of the project.

We appreciate the opportunity to provide feedback on this important program. Please feel free to contact Elizabeth Rorick, Acting Director of Government Affairs, at (703) 518-1200 ext. 3326 or erorick@pta.org if further clarification on the comment is needed.

Sincerely,



Charles J. "Chuck" Saylor
National PTA President

ⁱ Henderson A. and Mapp, K. (2002). A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement. Southwest Educational Development Laboratory. Fan, X., & Chen, M. (2001). Parental involvement and students' academic achievement: A meta-analysis. *Educational Psychology Review*, 13(1), 1-22. Jeynes, W. H. (2003). A meta-analysis: The effects of parental involvement on minority children's academic achievement. *Education and Urban Society*, 35(2), 202-218.

ⁱⁱ Houtenville, A. and Conway, K. (2008). Parental Effort, School Resources, and Student Achievement. *Journal of Human Resources*, XLIII, 2. Pp-437-53.

ⁱⁱⁱ Anthony S. Bryk and others, *Organizing Schools for Improvement: Lessons from Chicago*, (University of Chicago Press: Chicago, 2010), p.p. 46 & 83.

^{iv} Heather B. Weiss, Margaret Caspe and M. Elena Lopez (Spring 2006). Family Involvement in Early Childhood Education. Harvard Family Research Project, Harvard Graduate School of Education.

^v Henderson and Mapp.

^{vi} Consortium on Chicago School Research at the University of Chicago Urban Education Institute. (June 2009). *The Schools Teachers Leave: Teacher Mobility in Chicago Public Schools*.



November 18, 2010

Thelma Meléndez de Santa Ana, PhD
Assistant Secretary
Office of Elementary and Secondary Education
Attn: Striving Readers Public Input Meetings
U.S. Department of Education
400 Maryland Ave, SW, Room 3E203
Washington, DC 20202

Dear Dr. Meléndez de Santa Ana:

The American Speech-Language-Hearing Association (ASHA) is pleased to have the opportunity to respond to the U. S. Department of Education's (ED's) outreach efforts soliciting comments on the Striving Readers Comprehensive Literacy State Grant Program. ASHA is the professional, scientific, and credentialing association representing 140,000 speech-language pathologists (SLPs), audiologists, and speech, language, and hearing scientists qualified to meet the needs of the estimated 49 million (or 1 in 6) children and adults in the United States with communication disorders. With more than half of ASHA's members working in education settings, education is a major priority for the Association.

SLPs and audiologists provide services to children in both general and special education settings served under the Elementary and Secondary Education Act (ESEA) and those identified for services under the Individuals with Disabilities Education Improvement Act (IDEA). It is estimated that approximately 1.5 million students receive some form of intervention from these professionals. The high incidence of speech, language, or hearing disabilities in school-aged children requires a large, highly qualified pool of SLPs and audiologists to meet the needs of these students.

Good communication and literacy skills are fundamental to academic achievement, social well being, and lifetime opportunities. SLPs play important roles in ensuring that all children gain access to appropriate instruction in spoken language, reading, writing, and spelling. They provide assessment, evaluation, early identification, and intervention in language and literacy. There is a well-established connection between spoken language and reading and writing. Spoken language provides the foundation for the development of reading and writing. Instruction in spoken language results in enhanced written language, and conversely instruction in written language can result in improvement in spoken language. SLPs are often the first professionals to identify the root cause of reading and writing problems through a child's difficulty with spoken language. SLPs help children build the literacy skills they need to succeed in school, and use their knowledge and expertise to prevent, identify, assess, evaluate, diagnose, and intervene with individuals confronted with literacy problems.

ASHA is pleased to submit the following comments/recommendations on Striving Readers for the Department's consideration. Our primary recommendation is that SLPs be included among the eligible applicants for the sub-grant competition in the Striving Readers Comprehensive Literacy State Grant Program. Should you have questions about our comments, please contact Catherine Clarke, ASHA's Director of Education and Regulatory Advocacy, at 202-624-5953 or by e-mail at cclarke@asha.org

Sincerely,

Tommie L. Robinson Jr., PhD, CCC-SLP 2010 ASHA President



ASHA Comments of Striving Readers Program November 19, 2010 Public Input Meeting

GENERAL RECOMMENDATION: ASHA recommends that speech-language pathologists (SLPs) be included among the eligible applicants for the sub-grant competition in the Striving Readers Comprehensive Literacy State Grant Program. SLPs provide services to children in the general education setting (under ESEA), including pre-referral and consultative services, in addition to SLP's more traditional role in the provision of special education and related services (under IDEA). SLPs play important roles in ensuring that all children gain access to appropriate instruction in spoken language, reading, writing, and spelling. They provide assessment, evaluation, early identification, and intervention in language and literacy.

Rationale: There is a strong connection between language, literacy, and learning. Effective communication skills are essential for literacy acquisition and learning in the primary grades. Speaking and understanding are the foundation for reading, writing, academics, and social relationships. Effective communication skills are directly linked to success in major life activities—thinking, learning, literacy, problem-solving, getting along with others. The ability to read and write advances higher-level language and communication in areas such as vocabulary, figurative language, and complex syntax.

SLPs have extensive education and experience identifying and understanding individual differences in language development and disorders. This knowledge base, combined with proficiency using diagnostic-prescriptive approaches for assessment and intervention, is particularly valuable in school settings. Specifically, SLPs possess the foundational knowledge of language and its subsystems—phonology (speech sound systems), morphology (word structures), syntax (grammar), semantics (vocabulary), and pragmatics (social language use). Consequently, SLPs are instrumental in designing emergent and early literacy programs in phonological awareness, sound-letter correspondence, word recognition, and vocabulary development, which are fundamental to a child's ability to read.

Children with oral language disorders will likely have problems with reading, writing, academic, and social skills. They also may have behavior problems due to their inability to communicate effectively with their parents, teachers, and peers. Students with good communication skills are more prepared to make significant contributions to society. They are better equipped to think creatively and solve society's challenging and complex problems.

Public Input Questions

Transition and Alignment across Birth through Grade 12

1. How can sub-grantees ensure that the needs of children from birth through age five will be met under this program? How should subgrantees create effective partnerships with relevant organizations, including the State Advisory Council on Early Childhood Education and Care?

RECOMMENDATION:

Involve SLPs in the provision of services to children in the general education setting (under ESEA), including pre-referral and consultative services. These services are in addition to SLP's more traditional role in the provision of special education and related services (under IDEA). SLPs have a critical role to play in enhancing the speech and language skills of all children. SLPs are involved in the following ways:

- Provide information about developmental milestones so that families and teachers know what to expect at each grade. They help families and teachers understand the distinction between language disorders and language differences for children who speak more than one language.
- Assist teachers in general education classrooms by working with them to build spoken and written language skills that are essential for literacy and academic learning. The implementation of Response to Intervention (RTI) models is increasing across grades in school districts across the country. RTI uses multi-tiered instruction to improve student performance, prevent learning and behavior problems, and more accurately identify those students who may be eligible for special education services. SLPs have a central role in the implementation of RTI in general education for preschool and school age children.
- Help teams understand the link between spoken and written language, demonstrate how language affects literacy, and plan goals and strategies to address weaknesses and build on strengths.
- Assess and evaluate children with speech and language problems using a variety of non-biased standardized and nonstandardized assessment tools.
- As part of a team, SLPs design, implement, and evaluate intervention programs for those students diagnosed with speech and language disorders.

Rationale: There is a strong connection between language, literacy, and learning. Effective communication skills are essential for literacy acquisition and learning in the primary grades. Speaking and understanding are the foundation for reading, writing, academics, and social relationships. Effective communication skills are directly linked to success in major life activities—thinking, learning, literacy, problem-solving, getting along with others. The ability to read and write advances higher-level language and communication in areas such as vocabulary, figurative language, and complex syntax.

Meeting the Needs of Diverse Learners

1. How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

2. How can a State ensure that subgrantees will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

3. What should subgrantees consider when addressing the needs of their diverse learners across the age spans?

RECOMMENDATION 1:

Highly qualified, culturally competent personnel are needed to serve students from birth through grade 12 from diverse cultural and linguistic backgrounds. Such personnel will help to reduce educational disparities among racially, ethnically, and other diverse populations.

RECOMMENDATION 2:

Paraprofessionals and assistants must be directly supervised by highly qualified personnel. Parameters need to be identified that specify how such personnel should be trained, used, and supervised. States need to develop and adopt rigorous training standards and verifications of competencies.

Rationale: There is a growing need for qualified personnel to serve all students. Availability of qualified personnel is essential to prevent substandard services to learners and their families. We need effective pre-service and in-service preparation. Qualifications for service providers have been well established by professional organizations, state education agencies, and licensure boards. Culturally competent services recognize the importance of culture, cross-cultural relations, and the adaptation of services to meet culturally unique needs. Such services are essential in the increasingly culturally and linguistically diverse education arena. According to the National Center for Cultural Competence (2007), the provision of culturally competent services in the health care field increases access and enhances the quality of services as well as reduces health care disparities among racially and ethnically diverse populations. Culturally competent services in education will likely have the same effect—increased access and improved quality of service for all children and their families.

Professional Development, Instruction, and Assessment

1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful subgrant proposal?

RECOMMENDATION 1:

Highly qualified, culturally competent personnel are needed to serve students from birth through grade 12 from diverse cultural and linguistic backgrounds. Such personnel will help to reduce educational disparities among racially, ethnically, and other diverse populations.

RECOMMENDATION 2:

Implement effective recruitment and retention strategies to attract and retain highly qualified service providers to serve all students.

Rationale: There is a growing need for qualified personnel to serve all students. Availability of qualified personnel is essential to prevent substandard services. We need effective pre-service and in-service preparation of personnel who work with children during their early years. Qualifications for service providers have been well established by professional organizations, state education agencies, and licensure boards. Culturally competent services recognize the importance of culture, cross-cultural relations, and the adaptation of services to meet culturally unique needs. Such services are essential in the increasingly culturally and linguistically diverse education arena. According to the National Center for Cultural Competence (2007), the provision of culturally competent services in the health care field increases access and enhances the quality of services as well as reduces health care disparities among racially and ethnically diverse populations. Culturally competent services in education will likely have the same effect—increased access and improved quality of service for all children and their families.

2. What are the critical elements of an integrated, age-appropriate assessment system for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?

3. What are the most important ways to collect, analyze, and use data to improve literacy development and instructional practices and child and youth outcomes in early learning settings and in schools?

RECOMMENDATION 1:

Recognize the importance of providing assessments and evaluations in a child’s native language. Language usage in the home environment by the child and family must be considered at all times. Assessment and evaluation tools should be carefully selected to eliminate bias.

RECOMMENDATION 2:

Highlight the right to culturally competent services that are responsive to cultural differences in family values and child rearing practices.

RECOMMENDATION 3:

Include timelines that avoid undue delays in assessments and evaluations.

Rationale: In order to identify, evaluate, and meet the needs of all children, assessments and services must be provided in the child and family’s native language. This requirement is consistent with the ED’s regulations in 34 CFR part 100, implementing Title VI of the Civil Rights Act of 1964, which states that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Department of Education.” Native language assessment is the only valid way to determine the presence of a speech or language disability. Assessments and evaluations should be conducted in a way that will yield the most accurate information for all children regardless of the language they speak. Assessments and evaluations must: a) be conducted by qualified personnel; b) be administered in the child and family’s native language (by qualified bilingual personnel or with the assistance of professional interpreters); and c) be selected and administered so as not to be racially, culturally, or linguistically discriminatory. Assessment tools that have been developed to assess only English speaking children

carry an inherent linguistic bias. Assessments and evaluations should be administered in a timely manner. Lead agencies need to contact families and set-up appointments for the initial interview and/or evaluation following referral.

RECOMMENDATION 4:

SLPs and other service providers should base assessments and intervention on the curricular standards followed by the school system.

Rationale: When SLP services are linked directly to the curricular standards, there is more integration between the classroom instruction and speech and language services. This integrated approach leads to greater generalization of skills. For example, if a SLP is providing vocabulary instruction, the targeted vocabulary words should be consistent with the subject-specific words used in the classroom. The importance of tying intervention services with the curricular standards also is evident for students in general education. Another example is if a SLP and teacher are collaborating on a Response to Intervention (RTI) approach, they could use instructional strategies to help students meet goals established by the language arts standards (e.g., basic concepts, following directions, print awareness) or core standards. More intensive and individual services could be provided for students who are having problems meeting curricular goals.

Response from Elena Bodrova and the early childhood education team at Mid-continent Research for Education and Learning (McREL). The responses to the following questions primarily address issues associated with young children (ages 3 – 5). Since Striving Readers will now cover early childhood education, SEAs and LEAs need to consider issues associated with the unique needs of young children.

PUBLIC INPUT QUESTIONS

SEA and LEA Capacity and Support

1. What should States be considering in their State Literacy Plans to ensure effective literacy and language development and instruction? For example, what are core components of a State Literacy Plan? What roles and capacities should States have or develop in order to effectively support subgrantees in carrying out substantial improvements in literacy and language development, teaching, and learning?
2. How can this program most effectively support States' and LEAs' transition to new internationally-benchmarked college- and career-ready standards held in common by multiple States, as well as their use of State early learning standards?
3. How can SEAs and subgrantees best leverage the use of funds under the ESEA, the Individuals with Disabilities Education Act, and the Perkins Career and Technical Education Act, as well as other Federal, State, and local funds, for effective literacy development and instruction?

Transition and Alignment across Birth through Grade 12

1. How should States and LEAs assess their needs in order to effectively target the funds to appropriately support literacy and language development for children from birth through grade 12?
2. How can subgrantees ensure that the needs of children from birth through age five will be met under this program? How should subgrantees create effective partnerships with relevant organizations, including the State Advisory Council on Early Childhood Education and Care?
3. How can subgrantees ensure that the needs of adolescent learners will be met under this program? Specifically, how can subgrantees ensure that schools integrate effective literacy development and instruction into core subject areas and increase motivation and interest in reading and writing?

Meeting the Needs of Diverse Learners

1. How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?
2. How can a State ensure that subgrantees will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

Professional Development, Instruction, and Assessment

1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful subgrant proposal?

Young children have unique learning needs. Subgrantee proposals that address early childhood education / literacy should demonstrate that instructional approaches for teachers of young children are based on an understanding of their developmental characteristics and

individual differences and ways to address them. Professional development (PD) should address teaching methods that are developmentally appropriate, and ensure that content and pedagogy promotes both early academic skills and broader underlying cognitive and social emotional competencies. In early childhood learning domains are more integrated so PD should include training in areas that are associated with children's literacy, such as self regulation and motivation. Professional development should also demonstrate attention to specific learning contexts and the nature of teacher-child interactions most beneficial for young learners. Comprehensive professional development for early childhood teachers will include teacher assistants, aides, coaches, and other staff who may be involved in the classroom as appropriate. Furthermore subgrantees should demonstrate that the duration and intensity of professional development are sufficient to impact changes in teacher instruction and student knowledge. Additionally, successful subgrantee proposals should demonstrate that proposed PD is philosophically consistent with other building/program initiatives, aligned with kindergarten and early elementary programs, and supported by LEA leadership.

2. In what ways can technology and materials conforming to principles of universal design for learning (UDL) support effective literacy development and instruction for limited-English-proficient children and youth and children and youth with disabilities? What aspects of technology and UDL should be considered for incorporation in subgrant proposals?
3. What are the critical elements of an integrated, age-appropriate assessment system for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?

Assessments particularly with young children should be multimodal and measure multiple dimensions of child learning. Gathering data from multiple sources such as portfolios, observations, checklists, and work sampling will allow children to demonstrate their highest level of knowledge and skill. Assessments should be formative and systematic, and tied to instruction. Assessment stakeholders should reference and demonstrate an understanding of the critical elements of position statements from nationally recognized organizations, such as the Educational Testing System (ETS), the National Association for the Education of Young Children (NAEYC), and the National Research Council (NRC). Assessments should not be back-mapped from primary grades to early childhood and should be developmentally appropriate (see NAEYC position statement on assessment in early childhood). Assessments should be reliable, valid, and aligned with content standards. A child's native language should be considered during test administration, and resources should be provided to allow each child equal opportunity to demonstrate understandings.

4. What are the most important ways to collect, analyze, and use data to improve literacy development and instructional practices and child and youth outcomes in early learning settings and in schools?

Particularly for young children, data should be collected in ways that take into consideration children's developmental level and learning needs. It is important that assessments do not duplicate other data collection methods in order to lessen the burden on teachers and students. Gathering data from multiple sources such as portfolios, observations, checklists, and work sampling will allow children to demonstrate their highest level of knowledge and skill. Data should not be analyzed for classification, comparison, or placement purposes, but rather to inform instruction and monitor student progress. Young children may need more frequent assessments depending on their developmental progression, and no one data point should be analyzed to make decisions on a child's progress. Data collection and analysis should be informed by benchmarks and long term outcomes aligned with previously established goals and objectives of the adopted literacy program and instructional practices.

Assessments for the purpose of informing instruction should also be accompanied with professional development for early childhood teachers on conducting and using assessment data for instruction.

Evidence and Evaluation

1. In order to have a rigorous competition and make high-quality subgrant awards, what evidence should States require subgrantees to put forward in their applications? How can early learning providers demonstrate a "record of effectiveness," as required in the Act?

Evidence should not focus only on immediate outcomes as a record of effectiveness. As appropriate subgrantees should document long term benefits of proposed interventions, especially as they relate to early childhood. Documentation may include evidence from different research designs including but not limited to experimental, quasi-experimental, comparison, and longitudinal. Evidence may not be limited to standardized tests but also include impacts on instructional and classroom changes or behavioral data such as improvements in children's engagement and attention.

2. What approaches should States and subgrantees implement in order to effectively monitor program implementation and outcomes so as to inform continuous program improvement?

States should ensure that the evaluation plan involves a continuous process of systematically gathering, analyzing, and interpreting data, and providing this information to the project leadership groups to inform decisions about the effectiveness and progress of the program. Teachers and other early childhood staff should also be a part of the feedback loop, in order to inform improvements in the classroom and to recognize successes. Baseline data should be collected on all project objectives, performance indicators, and other critical elements identified at the beginning of the project (or as objectives are developed or revised), and assessment data should be periodically and systematically gathered on each objective at regular time intervals thereafter. As part of this continuous feedback loop feedback should be provided to all stakeholders (teachers, leadership, professional development providers). In addition to the ongoing feedback and continuous monitoring, a leadership group or oversight committee should be formed to meet on a regular basis to review program outcomes and oversee program progress.

3. What strategies should States and subgrantees implement in order to monitor and evaluate the effectiveness of job-embedded, ongoing professional development for teachers, coaches, principals, and administrators?

States should require formative and summative evaluations for all projects. States should ensure that the project design and evaluation plan use formative assessment and formative evaluation procedures to systematically and regularly obtain quantitative and qualitative as well as objective and subjective feedback throughout the project's duration to inform continuous improvements to services delivered by subgrantees. Additionally, subgrantees should provide measures of fidelity of implementation to monitor instructional practices and inform professional development. Such evaluations will require adequate funding from the State, and subgrantees should provide a thoughtful and thorough evaluation plan in their applications. Subgrantees should work with an evaluator as they develop project plans for their applications.

4. What should the Department require regarding rigorous, independent State evaluations of the program, given limited State-level administrative funds?

TO: Department of Education

FROM: Jacqueline Gerla, Ph. D.

School of Education (Chair of the Reading Department)

University of Texas at Tyler

CONCERNING: Striving Readers Comprehensive Literacy Program

Federal Grant Questions

SEA and Lea Capacity and Support

1.
 - A. Writing is neglected in most classrooms. I'm not talking about state tests' writing, for teachers teach to those. I'm talking about inundating children with writing. Incorporate writing into all curricular areas and have children write about everything. Have response notebooks and writers' notebooks an integral part of instruction. Teach grammar through writing in English class. Write about the literature children read. Do so much writing of all genres and self selected topics that children begin to think of themselves as writers. The more writing is incorporated into daily lessons, the deeper thinkers children will become and the better readers they will become.
 - B. Teach content area reading techniques so that teachers will understand how to teach reading and writing in all curricular areas.
 - C. Incorporate sustained silent reading of self selected books into most curricular areas i.e.: language arts, reading, science, history or social studies.
 - D. Inundate children with reading about topics in all curricular areas. Do much more reading than just textbook reading.
 - E. Use reader response groups in helping children to understand the reading.
 - F. Read aloud to children to motivate them to become readers. This applies to all levels, even secondary and all curricular areas.
 - G. Use guided reading (Fountas and Pinnell) and leveled books in elementary and middle school.
 - H. Use a balanced approach to literacy. Phonics is important, but it must be used in conjunction with reading rather than in isolation. The Reading First grant focused too much on phonics and on decodable texts.
- 2.
3. Since most special education children are included in regular ed classrooms, allow regular ed teachers to access ESEA funds for materials.

Transition and Alignment across Birth through Grade 12

1. A missing ingredient in most assessment is the expertise of the teachers. In reality, they know more than a standardized test or a benchmark what their students are capable of and how they are able to function in literacy tasks. Rather than just using tests results, the teachers should be asked to provide the names of children who are struggling with literacy tasks. If assessment is needed to verify teachers' judgment, informal assessment tools such as informal reading inventories, anecdotal records, reading miscue inventories, and running

records should be used. These assessments would show students' needs much better than a state mandated test.

LEA's could look at standardized test results to get an estimate of needs, but then go to teachers to get specific children to target.

2.

3. In order to insure that adolescents benefit from the grant, staff development where teachers are taught to inundate students with reading and writing in all curricular areas must be given. Teachers must be taught content area reading and writing strategies. They must also be taught to implement workshops in their content areas. Two days a week should be spent in workshop format. Student motivation for reading and writing would be an integral part of the workshop because students would self select topics within the area of study. Teachers need to be taught to cover their material in news ways so that they could see that workshops are a viable method of instruction. In that way students could read and write about what they are learning and they could investigate other tangents of the material they are learning. Grant money should be provided for teachers to purchase books for classroom libraries so that they would have reading material on major curricular areas. Books would be on many different reading levels in order to meet the reading level of each student. Consultants need to be a part of the grant where they can monitor the implementation of reading and writing strategies and workshop into the secondary classrooms. Along with consultants, administrators must buy into the instruction in order to insure implementation. A clause must be put into the grant stating that noncompliance would result in the suspension of the money.

Meeting the Needs of Diverse Learners

2. The state must mandate that all teachers including special education and ELL teachers attend the staff development and implement the reading and writing strategies into their classes. So much of the time, special education teachers keep their students busy with work sheets rather than reading and writing because they underestimate their students' abilities and because they don't understand how to teach through reading and writing. The staff development must be such that all teachers understand how to teach literacy through reading and writing rather than worksheets.
3. One important consideration should be the materials students are asked to use. Classroom libraries must be created in all classrooms where materials range in difficulty from beginning reading materials (even in secondary) through grade level and slightly above. Struggling readers such as ELL students must learn with books at their reading level. Another important aspect is language. ELL's learn best when their teachers can speak their language. Bilingual education needs to be extended into secondary schools because so many new immigrants are adolescents. Research shows that the older one gets, the more difficult learning a new language becomes. It also shows that when L1 can be used to supplement instruction in L2, learning becomes easier. Grant money could be provided to hire bilingual teachers or aides to work with the children. It could also provide money to purchase bilingual books.

Professional Development, Instruction, and Assessment

1. Teachers learn best when staff development is ongoing. During the summer, they could receive the initial training in a week or more of intensive teaching. If summer school were scheduled, teachers could then teach summer school with support from the consultant in their classrooms and with afternoon instruction after the morning summer school. Those teachers would then enter the fall semester with some practice in implementing the new instructional strategies. If that was not possible, right before the fall semester, teachers could participate in a week of intensive training followed by once a week training and in-class support during the week. The important aspect is follow through where teachers receive support for several years in the running. It's so easy to be excited about a new experience only to bog down in implementation. With a consultant who is at the school each week, teachers who bog down have someone to help them work out their difficulties. Another important aspect of the staff development needs to be that teachers aren't just lectured at, but that they have the opportunity to read and write and to do that which the consultant is teaching them to do with their students. For example, if reading/writing workshop is taught, then teachers should participate as students in the reading and writing workshop. Only when teachers are allowed to try the strategies as students will they internalize them well enough to teach them.
2. Depending on what is available, book nooks or Kendalls and I Pads would be useful technology for students. So much can be done on I Pads. Smart boards and projectors and document cameras are also necessary for classrooms. Money should be provided not only for the purchase of Kendalls, but also for the purchase of books that could be downloaded on the Kendalls.
3. Although most states have state tests' results at their disposal, when they depend exclusively on those standardized tests, they misrepresent many children. Children fall through the cracks for many reasons. State tests are not the only assessments that should be used. When making decisions that affect children's lives as do placement issues, teacher recommendation becomes a critical element. Teachers should be taught to use informal reading inventories, running records, reading miscue inventory as well as anecdotal records and classroom assessments in order to get a more accurate assessment of individual children's literacy needs.
4. Data is an important element in deciding what is and what is not working in classroom instruction. With that said, however, administrators must be careful about imposing external assessments such as district benchmarks too often on teachers who are trying to get as much instructional time as possible with their students. Learning takes time, and district benchmark tests that are given every six weeks don't allow adequate time for student growth to be significant enough to register. Some districts are demanding benchmarks that consume two or three days of instructional time each six weeks. Not only must teachers take time to administer them, but then they must compile the results and fill out charts to turn in to administrators. Much instructional time and planning time is taken in the endeavor. Assessment wasn't meant to be a district chore. It should be left to the teachers, the classroom experts and the ones who know the children best.

A portfolio system could be implemented where teachers keep students' work or best exemplars of their work. Each six weeks the districts could ask the teachers to analyze the results and to report students in need of extra help. Teachers could administer more time consuming assessments such as informal reading inventories or reading miscue inventories to those students whose portfolio indicates little progress. District assessments that require that teachers spend hours administering assessments to all their students when the majority is doing well, are wasted time that could be spent in more useful ways.

From: Baucom, Sofia [baucom@ECMHSP.org]
Sent: Thursday, November 18, 2010 2:21 PM
To: Striving Readers Comprehensive Literacy
Subject: Striving Readers Public Input
Attachments: Striving Readers Public Input11 18 2010.docx

Public Input E-mail

Striving Readers Comprehensive Literacy

SEA and LEA Capacity and Support

1. State Literacy Plans should:
 - a. Include Early Childhood Education, Family Literacy and Parents' Roles in Literacy components.
 - b. Be developed in partnership with existing literacy providers and non-profits focused on literacy.
 - c. Include data from needs assessments which include census data, State Education Agency data and Head Start, Early Head Start, and Migrant and Seasonal Head Start state community assessment data.

Transition and Alignment across Birth through Grade 12

1. States and LEA funding processes should include stakeholders from both public and private literacy providers, representing Head Start, Early Head Start, Migrant and Seasonal Head Start, Adult Literacy, Community College Systems, parents, and others in order to effectively address the needs of all children and families in the State.
2. States should develop a standing advisory committee including representatives from all primary stakeholders, including LEAs, Head Start, Early Head Start, Migrant and Seasonal Head Start, Universal Pre-K, Parents and Community Colleges.

Meeting the Needs of Diverse Learners

1. Include programs targeted toward supporting children and families from economically disadvantaged populations, dual language learners¹ and including children with

¹ Howard, E.R., Sugarman, J., Christian, D., Lindholm-Leary, K.J., & Rogers, D. (2007). *Guiding Principles for Dual Language Education* (2nd ed.). Washington, DC: Center for Applied Linguistics.

disabilities² such as Head Start, Early Head Start, Migrant and Seasonal Head Start and Universal Pre-K programs.

Professional Development, Instruction and Assessment

1. Successful sub-grant proposals should include job embedded training, mentor/coaching, targeted training and technical assistance, self-study modules, online credit courses. In order to effectively address areas of need, additional training developed for pre-service curricula and licensure and certification requirements should be based on information gained from statewide needs assessments.

² Carl J. Dunst, Ph.D., Carol M. Trivette, Ph.D., Tracy Masiello, Ph.D., Nicole Roper Ed.D., & Anya Robyak M.Ed. *CELLpapers*, Volume 1, Number 1

Comments of particular interest to RRCNA are provided below:

SEA and LEA Capacity and Support

The success of the Striving Readers Comprehensive Literacy initiative will be determined by the extent to which supportive funding targets students struggling the most with literacy. Interventions for struggling students must begin early because research has demonstrated that without intervention, a student who is lowest in first grade has an 88% chance of still being lowest at the end of fourth grade. With early and intense intervention, most of the lowest-performing students can achieve grade-level standard, thus improving their academic success and their school's overall performance.

Reading and writing instruction should encompass classroom-based instruction as well as appropriate, systematic and intensive one-to-one and small group instruction. Having the availability of one-to-one tutoring is essential for at-risk students in the early grades. The Institute of Education Sciences reports strong research evidence for one-on-one tutoring by qualified tutors for at-risk readers in grades 1-3 (the average tutored student reads more proficiently than approximately 75% of untutored students in the control group). Intense intervention for students reading significantly below grade level should be provided, both inside and outside the classroom. As such, state grant applications should be required to include an implementation plan that details how the SEA will assist eligible entities with providing classroom-based literacy instruction that is supported by one-to-one and small group instruction.

Professional Development, Instruction, and Assessment

The essential components of high-quality literacy-related professional development must include job-embedded, continuing opportunities provided by literacy coaches and/or outside providers with a proven track record of success. Specifically, professional development should help prepare teachers to improve literacy instruction; analyze data to improve student learning; use diagnostic, formative and summative assessments to inform instruction; and effectively implement literacy intervention strategies. High-quality professional development includes information on one-to-one, small group and classroom-based instructional materials and approaches supported by scientifically valid research. The definition of the term "scientifically valid research" should have the meaning given the term in section 200 of the Higher Education Act of 1965 (20 U.S.C. 1021).

Thank you for moving forward with this important funding initiative for birth through grade 12 comprehensive literacy instruction. The Reading Recovery Council appreciates the opportunity to provide comments.

Sincerely,



Jady Johnson, Executive Director

Lynn Colvin, Ed. D.
5311 Corning Avenue
Los Angeles, California 90056
Cell (310) 621-3529 Phone (310) 839-3297
lynncolvin@mac.com

November 15, 2010

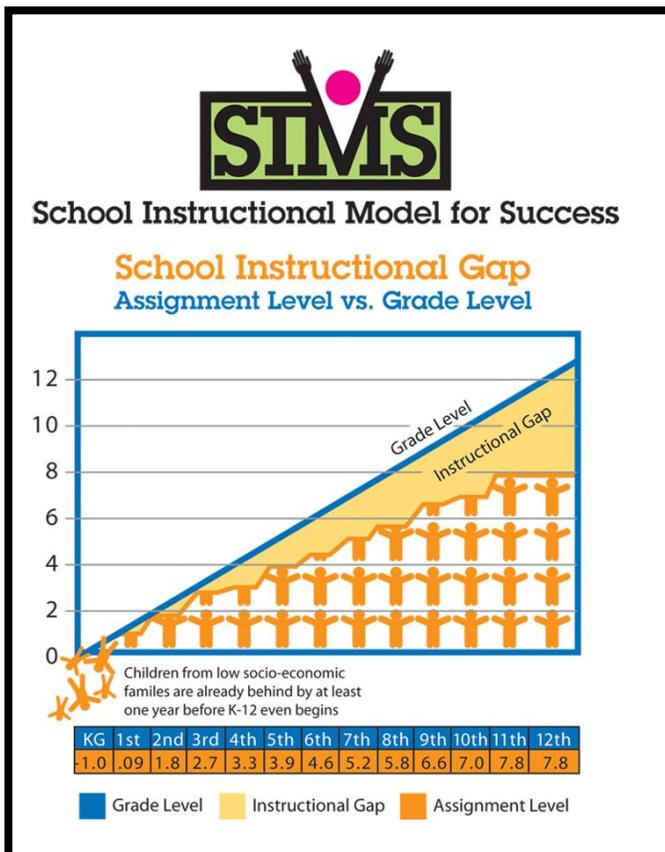
Katy Chapman
Confidential Assistant on Early Learning
US Department of Education
400 Maryland Ave. SW Room 7W217
Washington DC, 20202-5970

Re: Striving Readers Comprehensive Literacy State Grant Program

To whom it may concern:

Thank you for soliciting public comments on projects to support comprehensive literacy development and to advance literacy skills **from birth through grade 12**.

As a professional educator for over 30 years who has focused on raising student achievement and have had great results, I applaud you for including birth to 5 as part of the continuum to strengthen and improve K-12 education.



Children from low-income families are already one-year behind *before* K-12 education begins.

I want to state that I am concerned when some organizations have placed the goal of reading at grade level for third grade without any incremental methods of ensuring that students will have a foundation of building blocks that enables them to reach that goal. When over 50% of our low income students and English Language Learners enter kindergarten one to two years behind, they have little chance of catching up.

I would recommend that the following be included in the requirements for applications that would provide funding to support pre-literacy skills, reading and writing for students **from birth to grade 12**.

Area	Comment
Instructional Model	What is your instructional model and how do the parts integrate to ensure that all students are learning and that they will meet age and grade level goals?
Standards and Goals	How would you provide skills and concepts to children (preschool, elementary, secondary) with the building blocks needed on a continuous progress basis to ensure that <i>all</i> students start the grade prepared to learn grade level standards? How will you provide additional time for students who need extra help and extra time?
Professional Development	<p>How does your professional development focus on training, supporting, and coaching staff to meet age and grade level goals?</p> <p>Describe how your professional learning community works toward the goals of your instructional model and how your instructional leaders supports one another to ensure that they meet identified goals to ensure grade level attainment?</p>
Assessment	How do your instructional leaders and teachers use on-going formative data and assessment to

	<p>guide their instructional practices? How do you use assessment to help give additional assistance and instruction to students who need more time for instruction?</p>
Teacher Quality	<p>How do you ensure that all teachers are quality teachers? What rubric do you use and can you provide evaluation instruments that illustrate that teachers are receiving constructive feedback to help them grow and improve? Does the evaluation link student performance to teacher performance?</p> <p>What kind of</p>
Student Expectations	<p>How do you reinforce high expectations for students and how do you recognize and reward students who are making good progress?</p> <p>How do you share this information with parents?</p>
Leadership	<p>Do leaders in the school have educational and pedagogical training to support best practices? Describe how their skills and knowledge are shared with teachers and staff members to will create an effective learning community that gets grade level results for all students.</p>
Monitoring	<p>How do the instructional leaders and teachers monitor their instructional program? How do they plan to use the results of their program?</p>
Accountability	<p>Are teachers and leaders held accountable for their work? Are annual performance goals tied into the instructional model to ensure that human resources and capital are invested in the things that support student learning?</p> <p>If a teacher or administrator is not providing the quality needed, what steps are taken to support and remediate their performance? If they do not improve, what happens?</p>

Parent Education/ Family Support	How do you plan to involve parents in their children's education?
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In closing, these are my suggestions on the what should be the key aspects of a literacy program from birth to grade 12 that gets results. I wish I could be at the public hearing to participate, but in that I cannot, I hope that these are helpful.

Sincerely,

Lynn Colvin, E

From: cheryl ward [cacward@yahoo.com]
Sent: Thursday, November 18, 2010 10:29 PM
To: Striving.Readers.Comprehensive.Literacy

Dear Madams and Sirs:

I am writing to you on behalf of parents, educators and members of the Wisconsin Reading Coalition (WRC) and the Wisconsin Branch of the International Dyslexia Association (WIBIDA). We are a group of highly educated individuals, who after many years of failed services and interventions for our own children and students who struggled learning to read, have come together to break the cycle of instructional failure in our schools. In Wisconsin we have been working tirelessly to improve reading instruction and teacher preparation for our students and teachers.

Over the past 2 years, we have relentlessly pursued sharing information and our knowledge about effective reading practices with educational leaders and legislators. Unfortunately, Wisconsin is significantly lacking in knowledge and expertise within traditional educational institutions that the public relies on and these same educational institutions and agencies do not welcome or recognize in any significant way the input, knowledge and insights from stakeholders outside of these institutions.

Last week, at a meeting on November 11, 2010 in Madison, Wisconsin at the Department of Public Instruction (DPI) we first learned of the *Striving Readers Comprehensive Literacy State Grant Program* to assist States in creating or maintaining a State Literacy Team with expertise in literacy development and education for children from birth through grade 12 and to assist States, such as Wisconsin in developing a comprehensive literacy plan. In attendance were representatives from DPI, our State teacher union (WEAC), representatives from the Wisconsin State Reading Association (WSRA), several legislative aides and members of the WRC and WIBIDA. It was explained that this grant opportunity came to their awareness quickly, securing \$150K to "plan a plan" for Wisconsin's Literacy Plan. When asked who would comprise the literacy team they said they did not know and they were not certain how or when we could find out, only to say that our State Superintendent, Dr. Tony Evers was going to confirm who would serve. We are trying to get that information.

Surprisingly, after two years of routine and regular meetings and discussion with DPI staff, staff that includes our State Superintendent to those responsible for ELA, Licensing, Curriculum and Content, General Reading, Higher education and Special Education, we were not notified or chosen to participate on the State Literacy Team. Though we have been relentless in sharing science-based research and information about reading delivery and teacher preparation, in attempting to break through a culture of information control and growing grassroots support (www.wisconsinreadingcoalition.org) we continue to be nominally involved, if at all.

It is clear that as parents, literacy instructors to children who struggle learning to read, instructors of adult education, representatives of community-based organizations we have been over-looked as meaningful contributors to this important work. We represent grave concerns about the competence within our Department of Public Instruction and the knowledge and skills that we see as past and present representatives in all aspects of making significant improvements to reading literacy for our Wisconsin students. The reading outcomes for all students in Wisconsin speak for themselves. The weakness of student and teaching standards

continue to be addressed with the same bureaucrats who "do not know what they do not know" working within systems that support the status quo.

We are not hopeful that meaningful improvements will come and certainly not anytime soon by working with those in this fractured, inefficient, bloated and incompetent system. How will the Federal DOE know that the experts offered by those writing this grant will have the knowledge and expertise to produce a meaningful State Literacy Plan? Will this yet be ill-spent federal dollars for Wisconsin?

We implore you to carefully consider the prudence in granting Wisconsin funding and ask you to counsel our educational leaders in any way possible.

Sincerely,
Cheryl Ward MS, CALP
President
Wisconsin Branch
International Dyslexia Association

wisconsinreadingcoalition.org

From: Jonah Stuart [jonahs@teachingstrategies.com]
Sent: Thursday, November 18, 2010 11:53 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

To Whom It May Concern:

We appreciate you considering our input regarding early childhood assessment in the context of the Striving Readers program. Please let me know if you have any questions.

Sincerely,

Jonah Stuart
Public Policy Manager
Teaching Strategies

Professional Development, Instruction, and Assessment

Question 3 — *What are the critical elements of an integrated, age-appropriate assessment system for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?*

In early childhood settings, ongoing observational assessment should take place every day as teachers purposefully observe children in order to identify what they know and are able to do, and to individualize instruction accordingly. For assessment to make a difference, teachers must appreciate its value, understand how to do it, and see how it links to their curricula. They must know how to use what they learn about each child to plan instruction and support children's development and learning.

With that in mind, an integrated, age-appropriate assessment system aimed at helping early childhood educators identify strengths and weaknesses and improve literacy development and instruction should include the following elements.

- It should be authentic, on-going, and observation-based.
- It should assess children seamlessly from birth through kindergarten because early childhood development is a continuous progression.
- It should be based on a strong research foundation and be both valid and reliable.

- It should be user friendly and should help teachers streamline the assessment process so they can spend less time documenting observations and more time interacting with children.
- It should provide detailed guidance to help teachers understand the assessment cycle and know what to focus on, why it's important, and how to use assessment information to plan and report more effectively.
- It should allow teachers to produce individual and group reports that demonstrate student growth and performance.
- It should include interrater reliability training to ensure that teachers are marking children's progress reliably.
- It should allow teachers to accurately assess English- and dual-language learners and children with disabilities.
- It should be designed for use with any developmentally appropriate curriculum or literacy program.
- It should measure the knowledge, skills, and behaviors that are proven to be most predictive of school success. For language and literacy development, this includes:

Language

1. Receptive Language: listens to and comprehends increasingly complex language
2. Expressive Language: uses language to express thoughts and needs
3. Pragmatics: uses appropriate conversational and other communication skills

Literacy

1. Demonstrates phonological awareness
2. Demonstrates knowledge of the alphabet
3. Demonstrates knowledge of print and its uses
4. Comprehends and responds to books and other texts
5. Demonstrates emergent writing skills

From: qayle@autofish.net
Sent: Friday, November 19, 2010 12:58 AM
To: Striving.Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

To Whom It May Concern,

I teach and am a dyslexia curriculum specialist at The Brighton School, a small K-12 private school for students with dyslexia and other language-based learning disabilities in Baton Rouge, Louisiana. I am also on the board of the Louisiana Branch of the International Dyslexia Association. I have been working in the field of dyslexia remediation for about sixteen years, either teaching in a classroom setting or working individually with dyslexic individuals of all ages during that time. My background preparation for this is a Masters Degree in English Language with a minor in Teaching English as a Second Language, followed by four more years training years in Orton-Gillingham- based (multisensory) methods through an IMSLEC-accredited course. I currently teach seventh and eighth grade language arts (literature and language) and provide dyslexia remediation for other students several days a week after school and during the summer. I am also about halfway through another Dyslexia Specialist Preparation Program offered through Neuhaus Education Center in Houston, Texas., and plan to become a CALT (Certified Academic Language Therapist) upon completing my coursework and practicum.

Having worked with many dyslexic students who have previously received special education services in the public school system, I have observed that most of the programs used there do not meet the needs of dyslexic students. Without instruction that explicitly teaches language structure--beginning with the speech sounds and continuing up through phonics, syllabication, morphology, semantics, syntax, and text structure in a comprehensive, systematic, and sequential way, using multisensory methods--these children simply do not achieve functional literacy. Their relatively high representation in the general population makes this a lot of wasted potential, especially given their innate intelligence and other talents and strengths that they often possess. In Louisiana, an appalling number of students, dyslexic and not, do not learn to read well enough to obtain an adequate education.

I understand that the DOE is planning to allocate funding to advance K-12 literacy skills preK-12. I would like to respectfully request that the committee with decision-making power consider teacher training in MSL methods in lieu of investing in some popular but unproven programs. For example, Reading Recovery, a long-lived and widely used program, has never been definitively proven to help struggling readers, especially those with mild to moderate dyslexia. Training more teachers in structurally explicit, multisensory methods proven by solid research to be effective for dyslexic students would be more efficacious because those same methods would help other struggling readers as well. One reason that I chose to train in this field rather than go further on in traditional teacher training was my feeling that if I could learn to teach a dyslexic person to read and write, I would be able to teach anyone else to also.

MSL includes much more than just phonics, and it does take some training to use it correctly, but it has given me good--sometimes even dramatic--results with virtually every student I have ever worked with. Seeing this positive response, and the subsequent academic turnaround in these students' lives (not to mention a repaired self-image and a more positive attitude toward future learning) has kept me working enthusiastically in the field for over sixteen years now. I also have found that MSLE helps English language learners as well.

Several good MSL programs exist, and they are not all expensive. Some moderately-priced ones work just as well as more publicized expensive ones. I feel that this would be a far better investment--to go with research-based programs proven effective with dyslexic students, who truly struggle with reading and writing, than to essentially maintain a status quo that is obviously not working.

Thank you for your time and consideration.

Gayle Smith

From: joansedita@gmail.com on behalf of Joan Sedita [Joan@keystoliteracy.com]
Sent: Friday, November 19, 2010 10:25 AM
To: Striving.Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input
Attachments: Striving Readers Comprehensive Literacy Program Public Input Meeting.doc

Striving Readers Comprehensive Literacy Program Public Input Meeting

SEA and LEA Capacity Support

Question #1: The core components of a state literacy plan should include the following areas:

- **Assessment and Use of Data:** Including how the state will provide free or low-cost literacy assessment tools (summative, diagnostic, progress monitoring) that are consistent from PreK -12. These assessments are different from high stakes assessments such as NECAP, MSA, TAKS, MCAS, etc.). How the state will provide state-wide data-base for literacy assessment data.
- **Tiered Instruction:** How will the state support the delivery of tiered literacy instruction across all grades.
- **Teacher Licensure:** How can initial and continuing licensure and certification requirements be used as levers to insure that teachers will develop the necessary knowledge to weave literacy instruction at all grade levels and birth-K.
- **Professional Development:** see details below under PD, Instruction, and Assessment
- **Literacy Leadership:** What can be done at the state level to provide PD, ongoing support, etc. to principals and district administration so they become knowledgeable about best practices for literacy instruction. What plans does the state have for insuring schools and districts will develop literacy plans?
- **Resources:** How can the state make the most of technology, funding, and personnel to support school/districts literacy initiatives.
- **Addressing Equity:**
- **Community and Family**

Question #1: What roles should States have to effectively support subgrantees?

- I think it is essential that States have a very strong role in monitoring how subgrantees use the funding for this program.

Question #3: How to best leverage funds?

- Time should be given for planning how funding will be used – too often federal funds are awarded under tight time-lines for when the money must be spent. This results in insufficient planning.
- States should require schools and districts to have literacy plans so that all literacy initiatives and funding sources can be coordinated. Too often, several literacy initiatives from different funding sources are happening in a building with no coordinated effort.

Transition and Alignment across Birth Through Grade 12

Question #3: Adolescent Learners (grades 4-12)

- Subgrantees must have a plan for how provide long-term, sustained PD to content teachers to infuse literacy in content instruction.
- States must use whatever levers they have to insure that colleges and universities provide more training to grades 4-12 teachers at the pre-service and graduate levels.
- Subgrantees must agree to use more expository text at all grades, and to provide direct instruction for how to use complex text from all subjects. This will of course require training for teachers, especially content-specific teachers in grades 6-12.
- Subgrantees must agree that funding from this program will focus on all subject areas, not just ELA or English classes as has typically been the case in the past.
- Administrators in buildings of grades 4-12 must participate in literacy PD (research-based effective instruction, literacy planning, etc.). It is essential for them to create school-wide literacy planning teams that represent major stakeholders to develop a school-wide approach to literacy instruction.
- In addition to content literacy instruction for all students, for struggling learners, subgrantees must provide intensive intervention for a significant amount of time each week based on the specific deficit areas of the student, taught by interventionists who have been trained to appropriately use literacy interventions. Diagnostic assessments that measure all components of reading must be used to determine the individual needs of these struggling learners.
- States should use the levers of licensure and certification requirements to insure content teachers are prepared to teach literacy in the content areas, and that administrators can support building literacy efforts.

Professional Development, Instruction, and Assessment

Question #1: Essential components of high-quality literacy-related PD?

- PD must be more than initial, large group. While this is a necessary initial step, every plan for PD must include how follow-up over a number of months will be provided so that teachers can participate in guided practice and small-group sharing sessions. In addition to delivery of this PD by trained literacy professional development providers, the PD plan should also include how building-based PD support will be developed so that the support of the PD can be gradually released from formal training to peer-based.
- Building administrators MUST participate in the literacy PD that their teachers attend.
- There must be a plan for how PD will be provided each year to new teachers and administrators who replace those have been trained.
- Any on-line PD should be accompanied by some face-to-face PD. This type of hybrid online PD is more effective than just online training, but it also supports a more economical and practical way of delivering PD.
- Training for teachers should be provided for how to analyze the data from literacy assessments noted above. This is especially needed in grades 4-12 because many teachers do not know why struggling readers/writers have difficulty. This enables interventions to be targeted to the specific needs of the students.
- PD for teachers at all grade levels should be provided for how to deliver tiered literacy instruction. At grades 4-12, this should include how to teach vocabulary, comprehension, and writing about content as Tier I instruction to all students during content classroom instruction.

Question #3 and #4: Critical elements of assessment system? Important ways to collect and store data?

- The assessment system MUST provide summative, diagnostic, and progress monitoring tools to measure literacy skills in all components – that is, phonemic awareness, phonics for reading and spelling, fluency, vocabulary, comprehension, language structures for reading and writing (at the sentence, paragraph and text levels), and writing skills.
- The assessment system must provide vertical articulation from PreK-12 – that is, the same assessments must be used to monitor student progress over time.
- The data storage system should be statewide so educators can access long-term data if students move to different school districts.

Evidence and Evaluation

Question #1: What evidence should States require subgrantees to put forward in applications?

- Subgrantees should be required to have and submit building and district-level literacy plans, and indicate how the funding for the project will support those plans.
- Some percentage (e.g. 80%) of teachers and administrators from the subgrantee schools should sign an agreement that they are aware of what will be expected through the grant and that they agree to participate.
- If the awards are over multiple years, subgrantees must provide annual, detailed reports of progress.

Question #3: How to monitor the effectiveness of job-embedded PD?

- Measuring the effectiveness of literacy PD is not an easy task. Too often there is an assumption that all one has to do is compare pre- and post assessment data on students to determine if PD was effective. There are numerous problems with this assumption. First, one must determine if the teachers receiving the PD in fact applied any of it in their instruction. Therefore, one has to first measure the degree to which teachers apply the PD (via survey and actual observation). Second, it takes teachers awhile to try and master new instructional techniques they have learned in PD. The results on student achievement will most likely not be seen until at least a year or two after the PD. Also, teachers tend to start applying what they have learned in PD in “bits and pieces” – for example, if they are taught how to teach a routine for comprehension strategies such as Reciprocal Teaching, they may for the first year begin teaching only one of the strategies. With long-term follow up and support, they gradually add all of the components.
- To measure the effectiveness of PD, it is essential to monitor over time how many teachers continue to use the instructional practices they have learned. Surveys and other tools should check in at 3 months, 6 months, and then annually to see if teachers are still implementing what they learned in PD. Too often teachers feel they have learned some terrific things in PD and they start using them in the first few months, but then over time they give it up. This is especially true as new teachers who have not had the PD replace teachers who leave.

--

Joan Sedita
Founding Partner
Keys To Literacy

From: AH [AH@carneqie.org]
Sent: Friday, November 19, 2010 11:15 AM
To: Striving.Readers.Comprehensive.Literacy
Cc: AH
Subject: Striving Readers Public Input

To whom it may concern:

My name is Andrés Henríquez and I am a Program Officer at the Carnegie Corporation of New York. For many years I ran the Advancing Literacy Program that was focused on children in grades 4-12. A year ago today I testified before The House Committee on Education and Labor on Improving the Literacy Skills of Young Children and Adults.

For the record, I'd like to resubmit my testimony for the Striving Readers Public Input because it is still very much relevant. My testimony is here: <http://bit.ly/7muCHC>

I believe we are in a moment in time for doing real and permanent good in k-12 literacy. To date there are 41 states that have adopted the Common Core Standards in English Language Arts. The standards will give state teams the lever that is needed to focus on research-based practices have been found to be effective in the standards. What's more the ELA standards also include reading in other domains like science and history that are critical disciplines our students need to be successful in if they are going to be successful in college. Carnegie Corporation funded the National Governors Association Center for Best Practice to work with 8 states to develop literacy teams. The framing for how this work should take place at the state level was outlined in a guide from NGA *Reading to Achieve* which can be found here: <http://bit.ly/97NKPE>

In addition, a summary of the state initiatives can be found in this NGA issue brief: <http://bit.ly/bnVDmm>

Finally the Institute of Education Sciences funded the Regional Educational Laboratory at the Education Development Center which looked at Five State Efforts to Improve Adolescent literacy. That report can be found here: <http://bit.ly/d0mrBm>

It is not coincidental that our twelfth graders reading scores are improving on the Nation's Report Card, however slightly. Over the last ten years a number of states and districts have been working hard to maintain the momentum of the gains they've made in K-3 reading. An increased focus on adolescent literacy and college readiness have focused states and districts on the critical need of literacy not just in K-3 but in 4-12th grades as well. Carnegie Corporation's *Time to Act: An Agenda for Advancing Adolescent Literacy and College Readiness* outlines our work in this area: <http://bit.ly/b8dsQM>

The Striving Readers program is the best way to establish the link between solid planning , materials development and framing of professional development agenda for our future. The real work, however, will be in the execution and implementation. It is clear that a comprehensive literacy bill is necessary to ensure that we increase literacy rates significantly

over the next several years. I hope that the reauthorization of the Elementary Secondary and Education Act addresses this issue. As Secretary Duncan said this morning on a news program “We need to educate ourselves to a better economy.” Of course, literacy is the cornerstone for all our citizens for a rich education that will help our economy grow.

Respectfully submitted,

The logo for the Carnegie Corporation of New York. It features the word "Carnegie" in a large, elegant, cursive script. Below it, the words "CORPORATION OF NEW YORK" are written in a smaller, clean, sans-serif font, stacked in two lines.

Andrés Henríquez

Program Officer, National Program

Carnegie Corporation of New York

Office of Elementary and Secondary Education
Attention: Striving Readers Public Input Meeting
U.S. Department of Education
400 Maryland Avenue, SW, Room 3E203
Washington, D.C. 20202

American Library Association Comments Regarding the Design and Development of the Notice Inviting Applications for the Requirements of the Striving Readers Comprehensive Literacy Program

The Striving Readers Comprehensive Literacy (SRCL) program was established to advance literacy skills from birth through grade 12 – a long-standing, core mission of over 96,800 public and school libraries across the United States. To help ensure the success of the SRCL discretionary grant program, the American Librarian Association (ALA) encourages the Department to include the benefits of utilizing, and partnering with, public and school libraries in the notice inviting applications.

Research shows that children get ready to read years before they start school. In countless communities across our country, a public library is the place where a child's literacy education begins. The trained professional staffs in public libraries develop literacy programs that serve children and their parents/caregivers from all backgrounds from birth to college. While today's libraries help to ensure our students graduate with the 21st century skills they need to succeed in college and the workplace, building fundamental literacy skills and instilling a love of reading continues to be the top priority of every librarian.

The public library has always been the place communities depend upon for reading. Research shows there are six pre-reading skills that children must learn in order to read. Accordingly, public librarians have created their services based on research findings about brain development and how children learn to be proficient readers and learners. In fact, a recent study released by *Reading is Fundamental* concluded that giving children access to print materials is associated with positive behavioral, educational, and psychological outcomes. The public library is the only free source for these materials for preschoolers.

Public libraries open their doors to new parents with story hours and other programs to guide a child's early literacy development. While a parent/caregiver is a child's first teacher, more often than not, the public librarian is the parent's first literacy coach who can address specialized needs such as accommodating parents who speak English as a second language. At public libraries, children work with their parents/caregivers to learn narrative skills, being able to describe things and tell stories. They develop phonological awareness, being able to hear and play with smaller sounds in words. In the story times offered at public libraries, children become interested in books: learning the names of things, recognizing letters and noticing print, and how to handle a book.

Likewise, school libraries play a fundamental role in a student's literacy development. While the responsibility for the successful implementation of reading promotion and instruction is shared by the entire school community, library programs serve as hubs of literacy learning in the school. In addition, along with classroom and reading specialist colleagues, school librarians provide and participate in

continual professional development in reading that reflects current research in the area of reading instruction and promotion.

Students who can read and understand text in all formats and contexts are more successful in school and in life, and today's school libraries work to ensure students have these skills by creating an environment where independent reading is valued, promoted, and encouraged. A recent survey of teachers reveals that 83 percent of students most often get their books for independent reading from their school library. School libraries provide students, staff, and families with open, non-restricted access to a varied high quality collection of reading materials in multiple formats that reflect academic needs and personal interests. In addition, school librarians practice responsive collection development and support print-rich environments that reflect the curriculum and the diverse learning needs of the school community.

Not only do school librarians teach students about literacy and technology, they also support teachers with preparing materials and curriculum. In fact, the highest achieving students attend schools with a well-staffed school library. Not surprisingly, research repeatedly shows that a well-funded and fully staffed school library with a state-licensed school librarian is an integral component of a student's successful education. Across the United States, studies have demonstrated that students in schools with good school libraries learn more, get better grades, and score higher on standardized test scores than their peers in schools without such resources.

Simply put, our nation's school libraries provide access to materials in all formats, including up-to-date, high quality, varied literature that help to develop and strengthen a love of reading.

ALA is encouraged that at least eight states have included librarians as part of their SRCL Formula Grants for State Literacy Teams application (Arizona, Maryland, Massachusetts, Minnesota, Nevada, Ohio, Oklahoma, and Virginia). The input of these professionals, who serve on the forefront of community literacy efforts, will help to ensure state literacy plans are designed in ways that will maximize literacy development.

ALA, the world's oldest and largest library association, represents more than 63,000 librarians of all types who have been working on literacy development for decades. We have learned that communities that work collaboratively, with all the resources available, are significantly more successful than individual programs that operate in a silo. For that reason, we strongly recommend that the Department include the benefits of utilizing, and partnering with, public and school libraries as part of the SRCL discretionary grant application. Sadly, we have found over and over that various applicants for federal funds rarely take advantage of our services and programs unless such efforts are made perfectly clear in applications, uses of funds, and statutory definitions.

Accordingly, to help SRCL discretionary grantees realize the goals of their forthcoming state comprehensive literacy plans, ALA asks that Department of Education include, as part of its notice inviting applications, provisions that ensure:

- 1. Public libraries are explicitly described as a public or nonprofit organization or agency with a demonstrated record of effectiveness in improving the early literacy development of children from birth through kindergarten (with regard to early literacy activities); and**

Local educational agencies are encouraged to develop applications in conjunction with school library programs (with regard to elementary and secondary education activities).

November 19, 2010

The Honorable Arne Duncan
Secretary
U. S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202



NSBA

*Working with and
Through our State
Associations, NSBA
Advocates for
Equity and
Excellence in Public
Education through
School
Board Leadership*

Office of Advocacy

- *Earl C. Rickman, III
President*
- *Anne L. Bryant
Executive Director*

Dear Secretary Duncan:

The National School Boards Association (NSBA), representing over 95,000 local school board members across the nation through our state school boards associations, is pleased to submit this statement regarding SEA and LEA Capacity and Support in the Striving Readers Comprehensive Literacy Program (SRCL). Local school districts, governed by school board members selected by and from the communities they serve, are well positioned to help implement the new program. Many school districts provide or collaborate on early learning experiences for preschool children and therefore bridge much of the birth to grade 12 continuum of the SRCL program.

NSBA applauds the Department's efforts so far to disseminate \$10 million in funds to states to establish or support State Literacy Leadership Teams. Broad knowledge and experience from diverse perspectives on state literacy leadership teams is vital to developing comprehensive statewide literacy plans to meet the needs of all learners.

The next crucial step is to assure that the remaining \$190 million in FY 2010 funding is disseminated to LEAs in a timely manner to provide instruction, professional development, assessments and other critical components of a comprehensive literacy plan. State and local capacity and support are essential to closing achievement gaps and raising student achievement. Therefore, NSBA's responses to the three questions on SEA and LEA capacity and support are as follows:

Question 1 – Perhaps the most significant opportunity for State Literacy Plans is to bridge the child development and education continuum from birth to grade 12. The historical independence of early learning and K-12 systems is reflected in the structure of funding streams and oversight that at times undermines coordination, alignment and effectiveness. The SRCL program is a unique opportunity to build a bridge along the entire continuum in the area of literacy. To maximize impact of the program, it is imperative that states recognize all these elements in the plan.

One strategy to do so is to optimize expertise and opportunities available already in each state. For example, most states have or are establishing Early Childhood Advisory Councils (ECACs) authorized in the Head Start reauthorization to recommend improvements for the quality, availability, and coordination of services for children from birth to school entry. There is undoubtedly other expertise and capacity on other

issues in each state. Collaboration where appropriate and possible on quality, standards, professional development, assessments and other shared interests can increase the impact and reach of all for the benefit of children.

Question 2 – The SRCL program can most effectively help SEAs and LEAs transition to Common Core State Standards (CCSS) by preserving the state and local role that led to voluntary development and adoption of the standards by most states. The standards provide a framework for assuring that all students are college and career ready, but ultimately it will be up to states and school districts to implement them. Further, implementation of SRCL must recognize that LEAs are subject to federal statutory accountability requirements - such as those in No Child Left Behind Act - during the transition to CCSS. Therefore, SRCL should maximize flexibility for school districts to determine local needs and implement effective strategies to address them.

Question 3 – SEAs can play a significant role in leveraging the use of federal funds and resources under SRCL by deploying state set-aside funds for technical assistance, professional development, disseminating research, etc. on comprehensive literacy. States may also choose to review their state plans for ESEA and other federal funds for additional opportunities for coordination. However, it is imperative that LEAs retain flexibility and authority to determine how to utilize federal funds in also the most effective way.

In conclusion, local leadership from LEAs and early childhood is crucial to the success of the SRCL program. Other federal programs, such as Promise Neighborhoods and the White House Neighborhood Revitalization Initiative, fully recognize that community-based solutions are the key to success. The SRCL program is a welcome opportunity that could become a model for P – 12 collaboration in other areas.

Thank you for the opportunity to provide this statement. NSBA looks forward to an ongoing dialogue. Please call on us to assist in this vital work. Questions concerning our comments may be directed to Lucy Gettman, director, federal programs, at 703-838-6763; or by e-mail, lgettman@nsba.org.

Sincerely,



Michael A. Resnick
Associate Executive Director

From: Rich Long [RLong@reading.org]
Sent: Friday, November 19, 2010 1:54 PM
To: Striving.Readers.Comprehensive.Literacy
Cc: John Micklos; Rich Long
Subject: Striving Readers Public Input
Attachments: IRA input re Striving Readers Nov 19 2010.doc

Thank you for the opportunity to provide input to this critical program.

Richard Long, Ed.D.
Director of Government Relations
International Reading Association

Notice of public meeting and request for input to gather technical expertise pertaining to the Striving Readers Comprehensive Literacy Program (Federal Register: November 16, 2010 (Volume 75, Number 220 Pages 69986-69988))

The International Reading Association (IRA) appreciates the opportunity to comment and provide input on this critical topic. IRA is the largest professional organization in the nation dedicated to reading. We believe that our nation's future is directly linked to how well our students learn to read and write and how well they learn to apply that knowledge to their content subjects. As the latest data from the National Assessment of Education Progress (released November 18th) indicate, although the overall scores of 12th graders has improved since the last report, they are still significantly below our national goals, and achievement gaps between ethnic groups remain a major concern.

There is a significant need for the Striving Readers program. Providing a fund for professional development of teachers to work with high-need students is one of the key components of any overall school reform and improvement strategy. This program can make a difference in how reading and writing is being taught.

SEA and LEA Capacity and Support

One of the most important parts of the Striving Readers program is the state literacy teams. States and local agencies face many challenges in implementing this Act. Most state education agencies (SEAs) do not have the in-depth knowledge needed to create a comprehensive literacy program, which needs to have many significant dimensions to it. Each section of the program: early childhood, K-5, and 6-12 needs to be coordinated. While the new Common Core State Standards provide many critical ideas to provide guidance, the standards alone will not cover the complexities of teaching reading and writing to high-need populations. Therefore, state literacy teams must include members who reflect the wider community. In addition, both SEAs and local education agencies (LEAs) will not have the instructionally focused staff members who are able to determine how best to apply available research in reading and writing to each of the specific and individual high-need populations. This Act can provide the SEAs and the LEAs with increased access to information on how programs can be designed to meet the needs of diverse and struggling readers.

Each of the plans and the applications needs to have specific professional development activities and goals that are appropriate for each of the high-need populations at each of the age/grade levels. What is needed to work effectively with 2-year-old children will differ from what is needed for 11-year-old English language learners.

In addition, states will need to have the range of certifications for the different reading professionals. The skill set and knowledge base of a reading coach working at a high school level is significantly different from the background of the reading specialist working with classroom teachers in elementary schools. The needs of Head Start para-professionals learning how to encourage oral language development is significantly different from activities in schools.

Transition and Alignment Across Birth Through Grade 12

The Common Core State Standards provide significant guidance for the K–12 section of the Striving Readers program. It will also help to align the programs, especially those in grades K-12. For the age 0–5 group the answer is more complex. The LEARN Act provides a set of allowable activities that offer examples of how to facilitate language development and support reading (and writing) development.

Meeting the Needs of Diverse Learners

This is one of the most challenging sections of the Act. One reason is that while we are aware that each group has unique learning needs the research literature is not always definitive as to what constitutes the best choices in meeting those needs. To be effective, schools need to have flexibility in determining how best to offer services to diverse learners. This in turn means that the professional development activities, even when linked to the Common Core State Standards, must be interpreted. This interpretation should look at what the school is already doing well, the needs of each category of learner, and then what is specifically needed. In requesting applications from potential subgrantees, the state should require that each proposal include specific information on the needs of each category of diverse learner, at each grade level, and then how the program will support reaching those goals.

One of the critical aspects of meeting the needs of diverse learners will be who is providing these services. In most states there are certification requirements that cover various reading and literacy professionals. These should be used when services are being developed and implemented for high-need diverse learners. More specifically, the Act implies that schools will provide support to teachers who are already working with the high-need diverse students by bringing them more information and directly showing them how to enhance their instruction. Therefore, the local plans need to include information on the background of those who will be providing these services to the teachers, specifically citing how the state certifications for reading/literacy coaches are being used to implement this Act.

Professional Development, Instruction, and Assessment

At the heart of this Act is support for teachers to learn more about how to teach reading and writing to students who need more help in these areas. In order to be effective, teachers need to have input into what the professional development activities will be. The professional development needs to have clear goals, a basis in research that can be cited, and an assessment system that provides instructionally relevant information as well as information on the overall level of achievement of the students and the program.

In addition, the local plans need to include information on how the personnel being used to support this program are certified to do so. The plans also need to outline how the Act will be used to enhance the abilities of school- and district-level professionals by offering professional development on a long-term basis. To be more specific, if a local plan is based on the idea of bringing in outside professionals who will simply demonstrate ideas for teachers and then leave, then the results will be modest. It would be much more effective to use the Act to enhance the knowledge base of school- and district-based professionals to work with their teachers on an ongoing basis.

Evidence and Evaluation

State monitoring of the implementation of this Act will be difficult. Simply doing a paper review of how the money is being spent and ensuring that there was some type of pre and post testing is an important part of compliance. The real question, however, is how to conduct monitoring that goes beyond compliance and focuses equally on quality. Most states do not have the resources to do this. States will need to develop a program of quality monitoring that includes having professionals observe how the services are being planned and implemented. This can include having other grantees visit and observe what is being done and how it links to the plan, using distance learning to link state agency professionals with local district providers to observe, or having professionals from the state travel and observe.

Overall, this program is going to be demanding for most states to implement. Schools, districts, and state agencies involved in enhancing the reading and writing education of children between the ages of 0 and 5 and grades K–12 are usually isolated from one another. The Common Core State Standards provide some overall guidance on goals. The increased links between programs and the emphasis on making smooth transitions between programs will be important. The reality is that these elements are only the beginning. States and districts will need to work with those outside of the government to develop effective plans and initiatives. The needs of an 8-year-old English Language Learner whose home language is Spanish are different from those of an 8-year-old English Language Learner whose home language is Navajo. To be successful, schools will need to have access to a wide range of reading and writing professionals who specialize in the different needs of each school or program.

We look forward to continuing to work with the United States Department of Education to support the continued improvement of students' ability to read and write in order to learn.

From: Jennifer Kelly [nbct.jennifer.kelly@gmail.com]
Sent: Friday, November 19, 2010 1:54 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: Comment from Louisiana on Striving Readers

How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

My biggest concern is for students with Dyslexia but we know that for students such as ELL students, experience the same sort of problems due to language as those with Dyslexia. It is very important for those that are setting policy to understand the differences between the typical 'at risk' student and those with Dyslexia and not lump all students with reading difficulties into RTI alone. Where as RTI maybe beneficial to some Dyslexic students, I'm not sure that RTI interventionists are trained enough in MSL programs or techniques to benefit the Dyslexic population. My experience is that the students don't receive enough MSL when placed into RTI intervention alone. Perhaps with more training in both MSL techniques and the differences between 'characteristics of dyslexia' and "at risk reader" may be in order. It should further be considered that what is good for a student with "characteristics of dyslexia" is also good for an 'at risk reader'. ELL student would benefit as well due to the strong focus and systematic teaching of sounds that progresses to language development.

What should subgrantees consider when addressing the needs of their diverse learners across the age spans?

Teacher training, teacher training, teacher training. This should not exclude regular classroom teachers or administration. One of the biggest problems I see is that the person working with the students 'get it' under stand the remediation requirements and can identify students but do not have the support of administration or regular classroom teachers. When students move back to the classroom setting teachers do not know what to do with these students or how to address and support their needs. Extensive training needs to take place. Most teachers in the last 10-15 years graduated from college with a background in Basal Reading knowledge -- how to teach reading from a basal manual. This is not sufficient background or skills to teach diagnostically and address multiple levels and needs in the regular classroom setting. Teachers simply don't know what or how to do.

Thank you for your time and support.

--

~Jennifer L. Kelly
M.Ed., NBCT-Literacy, Reading Specialist, RTI and Dyslexia Coordinator

November 19, 2010



Office of Elementary and
Secondary Education
Attention: Striving Readers
Public Input Meeting
U.S. Department of Education
400 Maryland Avenue, SW, Room 3E203
Washington, DC 20202

RE: Striving Readers Comprehensive Literacy Program

To Whom It May Concern:

Nemours appreciates the opportunity to provide input on the Striving Readers Comprehensive Literacy Program. As one of the nation's leading child health systems, Nemours is dedicated to achieving higher standards in children's health by offering a spectrum of clinical treatment, research, advocacy, education, and community-based prevention initiatives extending to all families in the communities it serves. Starting with Alfred I. duPont's bequest over seventy years ago, Nemours has grown into a multi-dimensional organization offering personalized clinical and community-based preventive care focused on children, including early screening and intervention for children at risk of reading failure.

Reading may seem easy and automatic for people who master it without difficulty. However, reading is actually a complex and challenging task, so we shouldn't be surprised that so many children struggle with it. In fact, about 15 to 20 percent of the American population has a specific reading disability called dyslexia, making it the leading cause of reading failure in school. Because dyslexia and reading failure have a tremendous impact on a child's development – and because they affect millions of America's children – they are major child health issues.

Nemours BrightStart!

The good news is that we now know what dyslexia is, how to identify it from an early age, and most importantly, how to teach people with dyslexia so they can become successful readers. Nemours BrightStart! was established in 2005 to address this common and treatable problem from a very early age. Through our work with BrightStart! we have identified some key components to ensuring that our children become successful readers. First, we know it is critical to start early to prevent reading disabilities or delays. Early screening and intensive intervention can be life-changing for children at risk for reading failure. We also know that for a program to be successful, it must include screening and early identification, intervention and evaluation. And we believe the services should take place in the community: in child care centers, schools and other locations where children and families spend their time.

Nemours BrightStart! encompasses these key components, and the results from our program evaluation in Florida are impressive:

- Over 10,000 pre-kindergartners screened on early literacy skills.
- Over 2,000 at-risk children received Nemours BrightStart! intensive educational intervention.
- Two-thirds of participating at-risk children moved to the age appropriate range in their reading readiness skills after receiving the Nemours BrightStart! educational intervention.
- At-risk pre-kindergartners participating in Nemours BrightStart! intervention gained an average of 128% on their reading readiness scores upon completion of the program.
- The majority continue to display strong reading performance into the early elementary school grades.

First-year research results were published in the *Journal of Learning Disabilities* (July-August 2009); second- and third-year results are under review.

Many of the topic areas identified for input as part of this public meeting, including: Meeting the Needs of Diverse Learners; Professional Development, Instruction and Assessment; and Evidence and Evaluation are core components of the Nemours BrightStart! program. We are pleased to provide feedback on these topics, guided by our experience based on Nemours BrightStart! in Florida. Nemours BrightStart! is targeted to pre-kindergartners and kindergartners, and our comments all relate to that age group.

SEA and LEA Capacity and Support

We have learned from our experience with Nemours BrightStart! that there are a few key elements to a successful early literacy program. As states are developing their literacy plans and determining what they will require of the subgrantees they are funding, they should consider the following core components:

- **Age-Appropriate Goals and Strategies** – States should ensure that the information and strategies they are providing to subgrantees is age-appropriate. Targeted goals and strategies for various age groups, including preschool-aged children, should be included throughout the state plan.
- **Program Selection** – States should provide subgrantees with guidance on how to select an effective program. This should include providing subgrantees with criteria for evaluating whether or not a program is evidence-informed and effective.
- **Training** – Training of teachers and child care providers will be critical to the overall success of these grants, and should be closely linked with selected curricula and teaching strategies. States should provide subgrantees with the most recent literature on effective literacy training methods.
- **Evaluation** – Grantees will need to evaluate the success of their programs in the short and long-term. States should provide them with information on effective evaluation techniques.
- **Clearinghouse** – States should consider developing an online clearinghouse with literacy information that would be helpful to subgrantees.

Additionally, states should require the following of subgrantees:

- **Evidence** - Demonstrate that the literacy program they are investing in has some evidence of effectiveness, including longitudinal results, when possible.
- **Training** - Provide training to teachers and child care providers who are implementing the curriculum, and demonstrate a system to monitor implementation fidelity. Consider implementing a train-the-trainer

model so that the program will be sustainable.

- **Screening** - Select a literacy screening tool that can be utilized to identify pre-reading skills or reading proficiency. Screen all children.
- **Small-Group Instruction** - Provide small-group intensive instruction to children identified as “at-risk” for reading failure, based on screening results.
- **Evaluation** - Re-screen children after the program has been implemented to evaluate the effectiveness of the program and determine if additional student supports are needed.

Transition and Alignment across Birth through Grade 12

Inclusion of strategies targeted to pre-kindergarten and kindergarten children at the state and local levels is critical to reading success. Early identification and intervention for those at-risk can yield tremendous returns in catch-up growth in critical early literacy skills. To ensure that the needs of young children are met under this program, we recommend the following:

- **Age-Appropriate Strategies** - Research tells us that we must start early to prevent reading failure. It is estimated that up to 40 percent of children enter kindergarten one or more years behind their peers in critical language and reading readiness skills. The cost to try to catch them up far exceeds the costs of prevention and early intervention during the preschool years.¹ With that in mind, State Literacy Plans should include age-appropriate literacy and language development programs, including strategies targeted to preschoolers that are aligned with and support development of literacy skills emphasized by the Common Core Standards.
- **Collaboration Opportunities** - The State Education Agency and subgrantees should work closely with state child care offices and state associations or collaboratives representing child care providers. The State Advisory Council on Early Childhood Education and Care offers an excellent partnership opportunity since the council must include representatives of the State agency responsible for child care; the State educational agency; local educational agencies; local providers of early childhood education and development services; and Head Start agencies located in the State, among others.
- **Multi-Sector, Public-Private Partnerships** - Subgrantees should pursue partnerships throughout the community. Among the most important lessons we have learned is the need to develop strong, multi-sector, public-private partnerships so that interventions and programs are pervasive in communities, tap unique community assets, and reach children and families in the places where they live, learn, play and worship. Identifying, funding, and sustaining these partnerships will be critical to achieving true innovation that leads to lasting change.

Meeting the Needs of Diverse Learners

The diversity of learners’ skills and needs is greater now than ever before in our nation’s history. All children deserve the opportunity to achieve academic and life success, but the same instructional approaches are not sufficient for all. Many diverse learners are at risk for reading and academic failure. Research has proven that, when identified early and provided with appropriate, research-based instruction, nearly all can succeed. Diverse, at-risk learners are children with various neurodevelopmental disorders such as: language impairment or dyslexia; children with attentional, behavioral, or emotional challenges; English language learners; children from impoverished homes and neighborhoods; and children with more than one of these characteristics. To ensure that the needs of diverse young learners are met, we recommend that subgrantees commit to the following:

- **Training** – Programs should incorporate targeted professional development related to the characteristics and needs of diverse, at-risk learners. Teachers often make erroneous assumptions that students with diverse learning needs cannot learn in the mainstream classroom, and do not see themselves as capable of effectively teaching them. Nemours BrightStart! teacher training experiences have shown that, when these needs are specifically addressed through training, teachers can change their belief systems about diverse learners and themselves, which is critical to effective instruction for all children.
- **Universal Child Screening (with parent permission)** – When classroom teachers are trained to conduct their own screenings, they discover valuable information about individual children that they otherwise would not know. This informs their teaching and heightens awareness to individual strengths and weaknesses.
- **Small-Group Instruction** – This is essential for maximizing the academic progress of diverse, at-risk children. Teachers also experience positive reinforcement for their extra efforts with small-group instruction, as they see their students progressing and have the opportunity to establish closer connections with each child.
- **Appropriate Instructional Planning and Supports** – Diverse learners need highly systematic, sequential, intentional, and explicit instruction, more so than typical learners. Professional development training in these concepts and techniques, along with selection of curricula that build in these supports, are essential.
- **Planned, Intentional Family Connection Efforts** – Parents of diverse, at-risk, and struggling learners often feel undervalued and uninformed about their children’s instructional program, progress, and successes. Teachers should demonstrate a comprehensive plan for sharing regularly with parents, preferably in their native language when possible.

Professional Development, Instruction, and Assessment

Training of teachers and child care providers is critical to ensuring children’s reading success and the overall success of these grants. To ensure that teachers and child care providers have the training and resources needed, we recommend the following:

- **Joint Trainings for Early Childhood and Early Elementary Educators** – Subgrantees should demonstrate a commitment and plan for bringing together early childhood and early elementary educators. Training should develop mutual understanding of critical instructional priorities and challenges at each age and grade, and foster a broader sense of shared responsibility and accountability for long-term child literacy outcomes.
- **Professional Development Explicitly Targeting Critical Literacy Skills and Best Instructional Practices** – Subgrantees should demonstrate capacity to provide high-quality professional development that encompasses “what” to teach, and “how” to teach.
- **Use of Universal Design for Learning (UDL) and Technology in Professional Development** – Educators are also diverse learners, and use of high-quality UDL will ensure that instructional techniques are engaging and effective. Technology can play an important role in this regard, and online training options can make training readily available and cost-effective.
- **Psychometrically Sound, Brief, Age-Appropriate Assessment System** – Assessment should be tied closely to critical early literacy skills that research has shown are highly predictive of future literacy success. Ideally, the classroom teachers should be able to administer the assessment, to reinforce the skills of interest and connect assessment to instruction. Assessment should include several test periods during the school year, e.g., fall, winter, and spring.

- **Timely Access to Individual Child and Classroom-Level Results** – This is essential for assessment to inform instruction and help teachers be accountable for individual child progress.

Evidence and Evaluation

States should require subgrantees to provide evidence of their capacity to effectively implement innovative literacy programs that are tailored to the unique assets and needs of their community. In particular, states should encourage subgrantees to consider the following components:

- **Public-Private Partnerships** – Considering how to develop such partnerships for the purposes of this grant competition may encourage more innovative approaches that yield better literacy outcomes.
- **Demonstrated Record of Effectiveness** – Subgrantees should show strong record keeping that provides information from prior instructional initiatives, reflective thinking about past successes and failures, a comprehensive data collection analysis, and dissemination plan as evidence of their ability to effectively implement literacy programs in the community.

Concluding Remarks

Nemours thanks the U.S. Department of Education for the opportunity to provide input on the Striving Readers Comprehensive Literacy Program. We believe that early identification for individuals at-risk of reading failure and targeted intervention are of great public interest and that this grant program has important potential for improving literacy rates among America's children. If you have any questions, please feel free to reach out to Dr. Laura Bailet at lbaillet@nemours.org or (904) 697-3118 or Anne De Biasi, Director of Child Health Policy and Advocacy, at (202) 457-1440. We look forward to working with you in the future on this and other issues.

Sincerely,



Laura Bailet
Executive Director
Nemours BrightStart!



Debbie I. Chang, MPH
Vice President for Policy & Prevention
Nemours Foundation

¹ Fielding, L., Kerr, N., & Rosier, P. (2007). *Annual growth for all students, catch-up growth for those who are behind*. Kennewick, WA: The New Foundation Press.

From: Gail Nayowith [gnayowith@lmtilluminationfund.org]
Sent: Friday, November 19, 2010 3:18 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: "Striving Readers Public Input"

Striving Readers is an inspired effort that will allow states and non-profits to reach more deeply into communities where too many youngsters lack basic literacy skills. Non-profit organizations that offer afterschool and aftercare services and youth development programming for adolescents should be permitted to extend the reach of this innovative effort by providing literacy development for youth. Non-profits should be able to provide early literacy as well as adolescent literacy development in the Striving Readers Comprehensive Literacy Program.



Gail B. Nayowith
Executive Director
Laurie M. Tisch Illumination Fund

From: Victoria Ricketts [vickiricketts114@gmail.com]
Sent: Friday, November 19, 2010 3:33 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

Dear educators interested in facilitating success in struggling readers,

I worked as a professional developer and team member on the Striving Readers Project in Portland, Oregon. My thoughts and responses to key questions are listed below: I had many valuable experiences and I can be available for questions or collaboration at the contact information at the end of my responses.

SEA and LEA Capacity and Support

1. What should States be considering in their State Literacy Plans to ensure effective literacy and language development and instruction?

States should be considering only using an aligned instructional plan with RTI and Content Literacy. Research-based instructional practices that have been around for several years and are inclusive of all students can ensure effective literacy and language development. Unfortunately, several educational grant recipients are barely evidence-based. States should consider models of instruction that have an ample supply of quality leaders, professional developers and coaches. Instructional support is definitely a key component to successful implementation. Also, having a strong plan for sustainability is crucial. Building teacher leadership with accountability has been weak in some large-scale projects. Districts that effectively use Professional Learning Communities or Whole Faculty Study Groups reap greater achievement gains as well as success of sustainability. The last key component for States to consider in their Literacy Plans is an understanding by all stakeholders of the importance of ongoing assessment and continuous quality improvement. If a Literacy model does not have a systems approach design that provides a complete and integrated instructional method of learning for all, it should not be considered.

Meeting the Needs of Diverse Learners

1. How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

Supportive data for all these subgroups of children in a variety of cities and states should be required before a State makes a design a literacy plan. There are inclusive literacy models out there that can provide this data.

Looking back at weak links in literacy improvement projects, I believe States have tried to implement too many initiatives: Avid, Ruby Payne, Dorn's Literacy model for Elementary, but something else for secondary, etc. Teachers become confused and instruction is disjointed, and everyone starts feeling like "Lab Rats" in many mazes. Literacy plans which have elements of best practices for meeting the needs of ALL students and show how everything fits together are more likely to succeed. Literacy models that can show a continuum for literacy K-12 bring educators together as a valuable team.

Professional Development, Instruction, and Assessment

1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful subgrant proposal?

Professional development needs to be done with small groups of educators who can spend time practicing what they are learning during the professional development session. Professional development should be interactive and never "Sit and Get". In addition to the initial PD, teachers need time to plan and design content-specific lessons that have integrated units of instruction aligned with state/national standards. This has been a recurring complaint by teachers. Facilitated work sessions where quality professional developers, instructional leaders, or teacher leaders can guide, support, and provide feedback are instrumental for fidelity of implementation. Administrative personnel need to attend the PD and work sessions whenever possible. Again, as I mentioned earlier, districts that have effective collaborative educator teams/groups in place, are more likely to see quality learning and implementation.

2. In what ways can technology and materials conforming to principles of universal design for learning (UDL) support effective literacy development and instruction for limited-English-proficient children and youth and children and youth with disabilities? What aspects of technology and UDL should be considered for incorporation in subgrant proposals?

Teachers, like children and youth need technology that saves time and supports learning. Technology just for the sake of technology is meaningless. Teachers who have weak instructional skills think at times that technology will solve the learning problems of their students. It is a waste of funding to provide technology that merely takes the form of entertainment and keeps the children "out of the hair" of the teacher. We (people who have worked on large-scale literacy projects) have observed the misuse of funds in connection to providing teachers with expensive, up-to-date technology, and then the teachers don't use it to support the instructional literacy plan. When used correctly, technology that assists teachers as they do backwards design of instruction: Assessment first, then unit design aligned with course standards, and instruction that is explicitly focused on the critical content and utilizes higher order thinking is going to support achievement. Also, when new technology is provided to teachers and students, quality training and use of the equipment is a must. Sometimes, schools have relied on one "Tech Support" person to help a huge staff learn the technology. The teachers get frustrated, and shove the equipment into a corner. Again, the key component of quality professional development with a strong system of support must be part of the technology plan.

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Vicki Ricketts

Educational Consultant

Former instructional Specialist for School Improvement

Professional Developer for Striving Readers and Midwest School Improvement Initiatives

November 19, 2010

Thelma Meléndez de Santa Ana
Assistant Secretary for Elementary and Secondary Education
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW, Room 3E203
Washington, D.C. 20202

Dear Dr. Melendez:

As Executive Director of Teachers of English to Speakers of Other Languages, Inc. (TESOL), a global education association representing approximately 12,000 English language educators in over 140 countries, I am writing to you to offer TESOL's comments and feedback regarding the design and development of a notice inviting applications that establishes the requirements for Striving Readers Comprehensive Literacy grant competition.

Statistics and census figures have shown that English language learners (ELLs) are the fastest growing segment of the school-age population in the United States. Unfortunately, ELLs have continuously struggled with literacy as demonstrated by results of the National Assessment of Educational Progress (NAEP). Analysis of the 2009 NAEP reading results showed that 71% of ELLs in grade 4 and 74% of ELLs in grade 8 performed at below basic levels in reading. As this population of learners continues to expand in U.S. schools, programs such as the Striving Readers Comprehensive Literacy grant must address the needs of these learners so that teachers and schools are successfully equipped to help ELLs achieve academic success.

To assist the department in constructing its grant program, TESOL is offering its *Position Paper on Language and Literacy Development for Young English Language Learners (ages 3-8)*, which addresses several critical issues and identifies numerous resources focused on this topic. (A copy of the position paper is attached.) TESOL appreciates the opportunity to offer its comments, and hopes the Department will consider them when drafting the final notice.

TESOL welcomes the opportunity to be of further assistance to the Department of Education. If you have any questions regarding TESOL's comments, or need any additional information, please contact John Segota, Director of Advocacy, Standards, and Professional Relations, at 703-518-2513 or by e-mail at jsegota@tesol.org.

Sincerely,



Rosa Aronson, PhD, CAE
CC: Brock Brady, President
Christine Coombe, President-elect
Mark Algren, Past President
John Segota, Director of Advocacy, Standards, and Professional Relations

Position Paper on Language and Literacy Development for Young English Language Learners (ages 3-8)

Literacy learning and language acquisition are essential to young children's cognitive and social development. For all students, a strong and solid early education is critical to ensuring their long-term academic success. "Academic success, as defined by high school graduation, can be predicted with reasonable accuracy by knowing someone's reading skill at the end of grade 3" (Snow, Burns, & Griffin, 1998). Improving reading programs in early childhood and primary classrooms is the key to making sure that all students read on grade level by the third grade. For young learners of English who are speakers of other languages (ESOL), the challenges of literacy and language development are different if they are learning in an all-English environment where they need the language to function in school, or if they are in an environment where English is taught as a foreign language (EFL) in school. The focus of this position statement is those children who speak a language other than English at home and are entering school environments where English is the principal medium of instruction.

Principles and Recommendations

Based on research in early literacy development and second language acquisition, the following features of effective early literacy programs are recommended for young ESOL students.

1. Oral language and literacy development is supported by the student's native language.

All young children come to school equipped with a foundation in knowledge and learning from home. Development and learning begin in the first language, and it is in this language that children begin to construct their knowledge and form meaningful communicative relationships. Successful early childhood programs acknowledge and build upon this prior knowledge. Wherever possible, young ESOL learners should receive their initial reading instruction in their native language. Research on second language development has shown that literacy in a second language is supported by literacy in the native language. Language and literacy knowledge in one language can serve as the foundation for a new language (Cummins, 1991; Paez & Rinaldi, 2006; Proctor, August, Carlo, & Snow, 2006). Moreover, use of the native language builds a connection between the home and school. ESOL students' families should be encouraged to read and talk to their children in the family's native language if this is their strongest language. Families should be encouraged to develop literacy in the native language even when schools are not able to provide it, keeping in mind that not all families have had formal schooling opportunities. ESOL students' interaction with their families in their native language will give them the richest possible language foundation, advancing the learning of their first language as well as English, in both academic and social situations. Incorporating the native language to the second language learning process will allow young children to associate reading and writing with meaning and literacy knowledge derived from their home experiences.

2. Literacy learning in English is an on-going process that requires time and appropriate support.

It is well documented that all children learn at different rates. This principle is especially true for young ESOL learners, because L1 language development is distinctive from English L2 development. It varies based on a number of factors, such as how much literacy background they already have, the difference between the languages' writing systems, the age of the student when they were introduced

to schooling in English, and the nature of the demands (i.e., are they learning English as a subject in Qatar vs. going to second grade in Australia where all the subjects are taught in English). Contrary to what was once believed, ESOL learners can begin to develop literacy in English while they are still acquiring English (Hudelson, 1989). Literacy, cognitive, and conceptual development of ESOL students should be interlaced. However, even once they begin literacy instruction in English, ESOL learners will still need to continually develop their English proficiency. Oral or social language proficiency, which can be achieved within 2–3 years, should not be equated with academic proficiency or literacy in a language. Academic language develops over time, with repeated exposures to content and experiences and can take between 5 and 7 years (Cummins, 1991). Therefore, accountability systems that hold teachers and schools responsible for the English literacy development of ESOL learners in an unrealistic time frame may, in the long run, hinder the students' chances for academic success.

3. Instruction and materials are culturally and developmentally appropriate.

ESOL students who are at the early stages of schooling (ages 4–8) need to experience developmentally appropriate instruction that will help them acquire oral and written language proficiency in one or more languages. Developmentally appropriate practices require knowledge of child development including language and literacy learning, knowledge of students' strengths and needs, and knowledge of students' social and cultural context (Bredekamp & Copple, 1997). This kind of instruction engages children in meaningful interactions with adults, other children, concrete materials, and print materials. The materials that are used for young ESOL students need to be comprehensible, that is, designed to meet their linguistic and cultural needs as well as their developmental, cognitive, and social needs. In developmentally appropriate classrooms, students spend most of their time in rich language environments in which they observe, touch, listen, talk, and interact. Early reading and writing instruction is initially (ages 3–5) largely informal, playful, and based on oral language activities and personal experiences and can effectively incorporate the content areas. Instructors should limit activities that typically challenge the attention span of young learners, such as sitting quietly and listening for long periods, and printing neatly on fine-lined paper. More formal instruction in reading and writing is gradually introduced (ages 6–8), although emphasis on oral language activities, personal experiences, and learning through the content areas continue to be some of the most effective means of making instruction comprehensible for ESOL students. Standards-based instruction, as described in *PreK–12 English Language Proficiency Standards* (TESOL, 2006), *Integrating the ESL Standards Into Classroom Practice: Grades Pre-K–2* (TESOL, 2001), and *Paper to Practice: Using the TESOL ELP Standards in PreK–12 Classrooms* (TESOL, 2009) should be incorporated into developmentally appropriate practices.

4. Literacy programs are meaning-based and balanced.

ESOL learners need to understand why people read and write in order to be motivated to excel in their own literacy development. A preponderance of instruction focusing on the development of isolated skills such as phonics and reading fluency does not foster overall reading comprehension for ESOL students. For these students, reading comprehension is advanced when such skill instruction is connected to language that is comprehensible to them and firmly grounded in experiences with whole texts. A balanced literacy program will teach both reading and writing skills within the context of meaningful interactions with texts that elicit students' emotional and intellectual responses to ideas, characters, and events. Such texts should represent the variety of texts people have access to in their daily lives (i.e., newspapers, letters, directions, recipes, various forms of literature) to provide students with an accurate knowledge of the possibilities available to them for either reading or writing. Exposure to variety is key for ESOL students, as they may not only be learning a new language but a new culture as well. Using children's literature from a wide variety of cultural backgrounds will be a key part of such a program and will ensure that ESOL students feel included and represented. Writing experiences should also be varied and teach students to write in different genres across content areas. Effective literacy programs seek both literacy and content development,

assert that students within the program are learning the same content as native-English-speaking children, and look beyond the classroom for literacy experiences.

5. Assessment is reliable, valid, and ongoing.

A variety of formal and informal tools should be used to accurately assess the literacy development of young ESOL learners. These tools should be culturally and developmentally appropriate as well as connected to the instruction and curriculum of the classroom. Models that are culturally responsive and operate within a collaborative structure such as Response to Intervention (RTI) provide a fair assessment context. Culturally responsive systems are grounded in the belief that ESOL students can excel academically. Such models use universal screening, tiered instructional delivery, and continuous progress monitoring systems in both languages when warranted. Specifically, a variety of formal and informal tools should be used to accurately assess the literacy development of young ESOL learners. Teachers should be aware that errors on assessments of English literacy skills can be developmental in nature and will disappear over time as students acquire English language proficiency. By continually using reliable, valid, and fair assessments, teachers are able to modify their instruction and tailor it to the individual needs of ESOL learners. Gathering classroom data through a variety of assessments on an ongoing basis, as described in *Scenarios for ESL Standards-Based Assessment* (TESOL, 2001), keeps teachers apprised of student progress toward the attainment of ESL standards.

6. Professional preparation and development is continually provided for educators regarding linguistic and cultural diversity.

The presence of English language learners and culturally diverse classrooms—long a characteristic only of major cities—is more and more becoming the norm throughout the country (Capp, R., Fix, M., Murray, J., Ost, J., Passel, J.S. & Herwanto, S., 1995). In order to face the challenges that come with a diverse classroom, *all* educators and administrators need to have both pre- and in-service training opportunities in linguistic and cultural diversity, and in principles of first and second language development. It is also critical for early childhood educators to understand the linguistic and cultural backgrounds of their students in order to facilitate learning and build cross-cultural understandings with their students' families.

Preparing all teachers as well as teacher educators on the principles of second language and literacy development and effective instructional practices to engage ESOL learners can favorably impact the education of ESOL students (Brisk, 2008; Menyuk & Brisk, 2005).

Summary

The quality of education young children receive in their first years of schooling (ages 3–8) is often a critical indicator of their long-term academic success. Early literacy and language development are interlaced with social and cognitive development and are vital elements in the education of young children. For ESOL learners, the complexities involved with literacy and language development are compounded by the fact that they must be achieved in a language other than their native language, and often before they are literate in that language. Successful early childhood programs build upon the knowledge that young learners bring from home, and for young ESOL learners, this knowledge is learned and expressed in their native language. Research on second language development has shown that literacy in a second language is supported by literacy in the native language. Language and literacy knowledge in one language can serve as the foundation for a new language.

Differences between social and academic language need to be recognized and addressed by all teachers that ESOL students encounter. In other words, all teachers need to understand that social

language is based principally on familiar and often concrete concepts, whereas academic language is more linguistically complex, often involving abstract concepts, and is embedded into new cognitive information and topics. As a result, teachers, administrators, and families should understand that social language skills may develop within 2–3 years, as compared to full academic proficiency in a second language, which is more literacy dependent and can take 5–7 years to develop (Collier, V. P., 1989; Cummins, J., 1984). Arbitrary time limits for mainstreaming ESOL learners should not be placed on programs. Acquisition of language, particularly academic language, continues through education. Therefore, all teachers should view themselves as teachers of the English language and engage students in multimodal activities that include speaking, listening, reading, and writing within their content-area instruction to support students' success in English.

Instruction and materials should be appropriate in terms of developmental characteristics and language proficiency. Effective literacy programs maintain a balanced focus on both literacy and content development. In order to measure young learners' progress, a variety of formal and informal tools should be used that are reliable, valid, and fair. Most important, early childhood educators, just as their peers in K–12 education, need to receive pre- and in-service training on the importance of linguistic and cultural diversity as well as the foundations of second language learning for children from ages 3–8 so that they can meet the needs and challenges of their diverse classrooms.

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*Approved by the Board of Directors
October 2001
Revised March 2010*

From: Maureen Landry [maurenhlandry@bellsouth.net]
Sent: Friday, November 19, 2010 4:05 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

Friday, November 19, 2010

Meeting the Needs of Diverse Learners: despite years of various methods of reading instruction, lack of adequate reading ability continues to be the underlying problem for most failing students. Surely SBRR has confirmed that Orton-Gillingham based Multisensory Structured Language (MSL) programs offer the most effective methodology to meet the needs of students with dyslexia *and* other language-based learning disabilities. As good as any RTI and subsequent interventions may be for some, they will never be enough for the dyslexic student!

I am asking if this grant program can *require* that applying SEAs utilize some funding to provide for MSL programs *and* the teacher training and follow up required for designated teachers who will to provide appropriate education for these children? (Elementary classroom teachers are already struggling to meet the needs of their students with all levels of ability, it is simply not possible for them to teach a section of language disabled children in the way and at the pace they must be taught). RTI is **not** the answer for these particular struggling learners.

Economically disadvantaged students are not the only children and youth with disabilities. Is this entire funding pegged only to Title I?

While I am not an educator, I have been an advocate for students with language-learning disorders for 25 years; have served on several dyslexia task forces for the Louisiana Department of Education; President of the Dyslexia Society of South Louisiana; Vice President of the Louisiana Branch of the International Dyslexia Association; parent of a dyslexic adult and last but by no means least, the grandparent of 2 dyslexic granddaughters.

Maureen H. Landry,
Houma, Louisiana

McGraw-Hill Education Submission

Striving Readers Comprehensive Literacy Program

In Response to November 16, 2010 Federal Register Notice

McGraw-Hill Education appreciates this opportunity to respond to the request of the U.S. Department of Education (Department) for input from experts and the public to assist the Department's development of a State competition for funding under the Striving Readers Comprehensive Literacy Program.

McGraw-Hill Education is a leading innovator in the development of school instruction and assessment solutions for the 21st century. Through a comprehensive range of traditional and digital education content and tools, we empower and prepare professionals and students of all ages to connect, learn and succeed in the global economy.

McGraw-Hill's priorities in K-12 education include addressing and improving student learning outcomes by promoting digital innovation in literacy, STEM, college and career readiness, and intervention and special needs education. In an effort to address the challenges school districts face in fostering academic development across all levels, the company has established the Center for Comprehensive School Improvement (CCSI), which leverages McGraw-Hill's educational expertise and resources to create effective, customized solutions that enhance curriculum, instruction, assessment, professional development, district governance, and the use of digital and data-driven teaching and learning tools.

Through our PreK-12 businesses including the McGraw-Hill School Education Group and CTB/McGraw-Hill, our solutions and services include:

- A broad and complete approach to instruction, curriculum and assessment, aimed at substantially improving student outcomes,
- Teacher effectiveness and leadership development designed to create high-performing schools,
- Award-winning, formative assessment and predictive tools and services including CTB/McGraw-Hill's Acuity, the market-leading formative/interim assessment program, custom-developed state summative assessments, English language proficiency assessments, writing assessment and practice using artificial intelligence, and nationally-standardized achievement tests,
- Capabilities that enhance individualized and personalized instruction, and
- Ongoing support and measurement.

Every year, about 1.2 million U.S. students drop out before graduating from high school, and face limited odds of landing a good-paying job in today's highly competitive marketplace. Limited student literacy skills are a contributing factor to that statistic. To address this critical issue, McGraw-Hill supports all efforts by government, educators, and the private sector in developing and improving literacy instruction, which is the foundation of all learning.

The Department now has an opportunity to support the development of comprehensive literacy systems. We hope that the priorities and application would encourage states and subgrantees to show how they will ensure that all of the services and activities that have the characteristics of and are developed around effective literacy instruction will work together to enable a continuous education improvement loop.

The program should support research-based innovation, as new technology and new uses that support education increasingly become infused throughout the education system. The priorities and application should balance the benefits of literacy interventions that have been implemented and replicated for a number of years with the need to encourage the entry of new and innovative literacy interventions that have solid and more up-to-date research-based foundations. Innovative new programs have benefited from the lessons learned under prior reading/literacy programs and interventions that incorporate data-connected, multiple learning modalities (discussed below) with a strong emphasis on using technology to engage, assess and adapt instruction to meet the personalized learning needs of all students.

However, as we discuss below, screening and other assessments should be required to be used for purposes for which such assessments are valid and reliable. They also should be consistent with relevant, nationally recognized professional and technical Standards. This is required for assessments under the Elementary and Secondary Education Act and by rules and applications for federal reading programs.

The following discussion addresses several specific questions posed in the Notice on which McGraw-Hill Education's experience and expertise can help inform the Department's final decisions.

Professional Development, Instruction and Assessment

(2) In what ways can technology and materials conforming to principles of universal design for learning (UDL) support effective literacy development and instruction for limited-English-proficient children and youth and children and youth with disabilities? What aspects of technology and UDL should be considered for incorporation in subgrant proposals?

Priority should be given to comprehensive literacy programs that use data-connected multiple learning modalities. Examples could include 1:1 computer-led instruction; teacher-led small-group instruction; teacher-led whole group or small group projects; student-led small group projects; independent reading; and individual tutorial session between teacher and student. By placing a high priority on using technology, states and subgrantees would better be able to engage, assess, and adapt instruction to meet the personalized learning needs of all students. A demonstration that

technology is a core component is an essential element for an effective comprehensive literacy program. Technology should be central to the services and activities to support the basic principles of universal design for learning (UDL), including providing alternative representations of materials, options for comprehension, alternative modalities for expression and alternative means of recruiting student interest and engagement.

More specifically, technology should be used by states and subgrantees to provide ongoing formative and benchmark assessments that measure student progress **specifically for literacy** and that adjust the instructional sequence to meet the needs of each student. In some cases, teachers may have to intervene when individualized student data reveal the need for targeted teacher-driven instruction. Technology should be used to engage students in their learning by using the dynamic and interactive capabilities of media to represent and to unlock key skills and strategies that students have struggled to master using traditional methods. Technology can be used to guide all students through their own personalized learning sequence by modeling strategies and assessing students' understanding through multiple modalities of interactive expression.

Technology and UDL also mesh when they are involved in project-based group learning that is linked to personalized student data and teacher observations. Project-based group learning provides ample opportunities for alternative representations; alternative modalities for comprehension and expression; active learning opportunities for all students; and maintenance of student interest and engagement inspired by technology-based personalized instruction.

(3) What are the critical elements of an integrated, age-appropriate assessment system for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?

Priority should be given to comprehensive literacy systems that constantly and consistently use assessments for multiple purposes, including but not limited to screen, diagnose, measure progress, adapt students' paths through learning progressions, and provide data-driven personalized instruction for all students in all learning modalities. On-line progress monitoring is at the heart of the comprehensive literacy system's data-driven individualized learning modality.

Ongoing daily embedded assessments should be considered as "formative" assessments when used to guide all students through their adaptive and personalized learning paths, consistent with the definition used for Race To The Top, discussed below. Periodic and predictive interim assessments should be used to monitor and to measure progress; provide instructional resources to students, teachers, and parents; and to predict success on summative or outcome assessments. Applicants should demonstrate that data on student performance are constantly collected, synthesized and reported to be available to key stakeholders. Teachers can use appropriate and targeted data to

adjust and to deliver instruction in teacher-mediated one-on-one, small group and whole group learning modalities.

We urge the Department to incorporate the key definitions for “diagnostic reading assessment” and “screening reading assessment” from the Striving Readers program, which will maintain continuity for those districts that participated in that and Reading First. Additionally, the application should incorporate from the Department’s Race To The Top regulations the definitions of “formative” and “interim” assessments –

Formative assessment means assessment questions, tools, and processes that are embedded in instruction and are used by teachers and students to provide timely feedback for purposes of adjusting instruction to improve learning

Interim assessment means an assessment that is given at regular and specified intervals throughout the school years designed to evaluate students’ knowledge and skills relative to a specific set of academic standards, and produces results that can be aggregated (*e.g.*, by course, grade level, school, or LEA) in order to inform teachers and administrators at the student, classroom, school, and LEA levels.

Explicitly including these definitions would facilitate coordination between those assessments used for the purpose of the literacy program and those being developed or supported through Race To The Top.

(4) What are the most important ways to collect, analyze, and use data to improve literacy development and instructional practices and child and youth outcomes in early learning settings and in schools?

As noted above, priority should be given to ensuring the central role of using data from a variety of assessment sources to inform and to adjust instruction to meet the personalized learning needs of all students.

Progress monitoring by all key stakeholders is essential to the success of a comprehensive literacy program. Data from all embedded, ongoing, formative and interim assessments must be used to provide an overall student profile that measures progress and gaps in learning that can be remediated through more targeted teacher-driven or technology-driven instruction. Students should be made aware of their progress and mastery through programs such as engaging reward environments that celebrate mastery and progress through their learning progression. Students, as appropriate, should also be able to receive a more specific data-driven representation of their progress through periodic conferences with their teacher where simple representations of their progress can be reviewed and discussed.

Teachers must be armed with data – and have participated in essential professional development – to make appropriate instructional decisions in teacher-mediated learning modalities, combined with their own observations and less formal assessment techniques. Key student progress monitoring reports should identify students’ strengths and weaknesses that can be leveraged or remediated in one-on-one, small group or whole group learning modalities. One-on-one learning sessions would use data to focus on learning targeted skills and strategies that the student has not mastered through the technology-based learning progression. Small group sessions would use data to set up personalized shared-reading, independent reading and response-to-reading writing and discussion experiences. Whole group project-learning-based modalities would use data to set up collaborative teams and to assign learner-specific roles to each team contributor.

Evidence and Evaluation

(2) What approaches should States and subgrantees implement in order to effectively monitor program implementation outcomes so as to inform continuous program improvement?

Program monitoring should include the administration of assessments, such as nationally-normed, valid, and reliable assessments, that can be used as accountability measures of the student outcomes for the comprehensive literacy programs. Priority could be given to instruments that enable district, state, and/or national comparisons of student performance. An additional priority purpose for assessments by the state and subgrantees would be to use interim assessments to monitor within year and across year growth – clear indicators of continuous program improvement.

Conclusion

McGraw-Hill Education is a global education company helping U.S. school districts accelerate student and teacher achievement for more than 100 years. Our solutions span the full spectrum of lifelong learning – from early childhood development to professional development. Strong literacy skills are essential at every stage of that learning process, and that is why we strongly support the full and effective implementation of the Comprehensive Striving Readers Literacy program.

Contact:
Tom Stanton
McGraw-Hill Education

November 19, 2010

Honorable Arne Duncan
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Striving Readers Comprehensive Literacy Program

Dear Secretary Duncan:

NEA welcomes the opportunity to provide input to the Office of Elementary and Secondary Education regarding the Striving Readers Comprehensive Literacy Program. This program promises to provide essential resources to support literacy achievement for all students. We look forward to a program that builds on the lessons from past literacy legislation and helps move instruction, assessment, and professional development along a path of increased effectiveness.

Our responses to specific questions follow:

Meeting the Needs of Diverse Learners

Question 1. How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

States, districts, and schools must develop literacy plans to incorporate appropriate instruction for economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities. The literacy plan should include the use of proven and promising instruction in schools, such as:

- integrating listening, speaking, reading, and writing skills into instruction from the start;
- teaching the components and processes of reading and writing;
- teaching reading comprehension strategies;
- focusing on vocabulary development;
- building and activating background knowledge;
- teaching language through content and themes;
- using native language strategically;
- pairing technology with existing interventions; and
- motivating all students, especially adolescents ELLs through choice.

Question 2. How can a State ensure that subgrantees will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

The State can support the subgrantee's capacity to develop educator capacity by doing the following:

- Set state teacher education policy to ensure all teacher candidates learn about second language and literacy acquisition, reading across the content areas, and sheltered instruction and ESL methods. The policy might propose a continuum of teacher development from pre-service to induction and mentoring to ongoing development for new and experienced teachers.
- Update state teacher certification requirements so all credentialed teachers are capable of working effectively with ELLs, students with disabilities, and disadvantaged students. .
- Require districts to provide meaningful, ongoing, professional development or on-the-job training for administrators, coaches, teachers and education support professionals (teaching assistants, etc.) with high numbers of ESL students, students with disabilities, and disadvantaged for addressing the needs of these students within content area and literacy education contexts.
- Provide educators with release time and/or financial support to enable them to participate in professional development in literacy instruction for ESL students, students with disabilities, and disadvantaged students, and/or to earn endorsements or advanced certification in that area.
- Offer similar incentives for educators of ESL students, students with disabilities, and disadvantaged students to become more knowledgeable about literacy instruction, so they can effectively integrate teaching strategies in their lessons and collaborate with regular content-area teachers.
- Modify definitions in state criteria for demonstrating teacher competency, so that content-area teachers in schools with high percentages of ELLs demonstrate competence in working with them.

Question 3. What should subgrantees consider when addressing the needs of their diverse learners across the age spans?

States should do the following:

- Review the state English language development standards for all students, especially adolescent (grades 6 to 12) ELLs to make sure they incorporate language learning strategy development and use of literacy processes.
- Make available appropriate grade-level textbooks when possible, and manage the linguistic complexity level, so they may be supplemented by a selection of more accessible texts to reach multiple proficiency levels and connect to students' background experiences.
- Provide high-quality vocabulary instruction throughout the day. Teach essential content words in depth. In addition, use instructional time to address the meanings of common

- words, phrases, and expressions not yet learned. Current research suggests that English learners will benefit most from rich, intensive vocabulary instruction that emphasizes “student-friendly” definitions, that engages students in the meaningful use of word meanings in reading, writing, speaking, and listening, and that provides regular review.
- Instruction focused on academic English should not wait until students are able to read and write in English. Before English learners are reading, the development of age-appropriate academic English—morphology, syntax, vocabulary—can be accelerated orally through planned and deliberate daily instruction.

Professional Development, Instruction, and Assessment

Question 1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful subgrant proposal?

The essential components in a high-quality, literacy-related professional development program include an emphasis on the capacity to make decisions and match instruction, materials, and resources to the specific needs of students. It is important to move away from professional development that focuses on implementing canned programs and truly work to build the ability of teachers to make informed instructional decisions. One proven approach to professional development is providing time for teachers to examine student work and discuss what they observe and the implications of their observations in learning groups. This requires time and resources to develop and use formative classroom assessment tools and techniques.

Question 2. In what ways can technology and materials conforming to principles of universal design for learning (UDL) support effective literacy development and instruction for limited-English –proficient children and children and youth with disabilities? What aspects of technology and UDL should be considered for incorporation in subgrant proposals?

Technology should be a part of the resources for teaching, learning, and sharing of student work and professional observations and ideas. Technology should not be the platform for the entire literacy program. Teachers should have access to a range of resources and instructional approaches and they should be given flexibility to make decisions about how best to use resources with individual students. This would also support the infusion of UDL throughout the literacy program.

Technology and second language literacy development generally relate in two ways—through the teaching of technology-based literacy skills and through technology supports for literacy development. The incorporation of technology into instruction for ELLs is seen as promising, as the practical relevance and often two-way nature of the work are thought to positively impact student motivation.

The use of audio books can also support students’ literacy development, especially if students follow along with a written text; the recordings provide students with models for pronunciation

and read-aloud fluency. For students whose spoken English is better than their reading skills, hearing the words read aloud can aid in vocabulary comprehension. In general, technology-based literacy instruction can promote reading and writing development for students but that instruction should be highly scaffolded.

Integrate Universal Design for Learning (UDL) features that support achievement as well as access into instructional materials so that students receive differentiated learning experiences and are enabled to use a range of assistive technologies and formats appropriate to their needs and learning tasks.

Educators of all students should be provided with professional development opportunities to understand how to use accessible materials, assistive technologies, and the UDL framework to improve participation and progress in the general curriculum -and to improve academic achievement outcomes for students with disabilities.

Use technology and UDL better inform families about the benefits of accessible materials for their children and to learn more about the ways in which specialized formats can and should be used to support improved learning and productivity. These efforts, taken together, can be expected to increase the achievement of students with print-based disabilities by enabling participation in high quality instruction and assessment.

Question 3. What are the critical elements of an integrated, age-appropriate assessment systems for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?

The critical elements of an integrated age appropriate assessment system include, first and foremost, formative assessments developed by teachers to enable teachers and students determine progress and areas that need attention. These are not interim or benchmark assessments that are mini versions of large-scale accountability tests but rather tasks that allow teachers and students to perceive directly what has been achieved rather than having to interpret scores on questions that might not relate directly to the curriculum. Young students (grades k-3) should not be assessed on large-scale assessments – at least not multiple-choice assessments that resemble the ones currently used in most states. The system should include opportunities for teachers to discuss the results of both large-scale and classroom assessments with other teachers.

The emphasis should be on effective classroom assessment. Millions of dollars have been spent on large-scale multiple-choice assessments and recent NAEP results indicate that the large investment in these types of tests does not improve student achievement. Little has been spent on helping build teacher capacity with formative assessment in spite of the fact that research has shown it to be effective in improving instruction and learning. It is time to spend resources the more promising components of an assessment system.

The large-scale assessments in such a system should focus on outcome such as those articulated in the Common Core State Standards rather than the individual, enabling skills enumerated in many state standards documents. The purpose of the large-scale assessment should include indicating broad achievement of schools and comparable achievement of students but not

diagnosis of individual students. Most current, large-scale assessments are neither designed nor valid for that purpose. The formative, classroom assessments should provide individual diagnostic information.

Question 4. What are the most important ways to collect, analyze, and use data to improve literacy development and instructional practices and child and youth outcomes in early learning settings and in schools?

Data should be shared with teachers, students, parents, community stakeholders, and policy makers with each group being able to examine the data from the perspectives relevant to their roles. Technology, as well as face-to-face meetings should be used for sharing and discussing what the data indicate.

Evidence and Evaluation

Question 1. In order to have a rigorous competition and make high-quality subgrant awards, what evidence should States require subgrantees to put forward in their applications? How can early learning providers demonstrate a “record of effectiveness,” as required in the Act?

Subgrantees should submit a plan indicating program components to be funded and how various aspects of the program will be aligned with each other and with rigorous common standards. They should indicate how improved assessments will be incorporated into the program.

Question 2. What approaches should States and subgrantees implement in order to effectively monitor program implementation and outcomes so as to inform continuous program improvement?

They should use classroom observation, evidence from formative assessments, surveys, and samples of performance on assessment tasks clearly aligned to the standards mentioned in the response to question 1.

Question 3. What strategies should States and subgrantees implement in order to monitor the effectiveness of job-embedded, ongoing professional development for teachers, coaches, principals, and administrators?

They should use surveys, observations, and examples of student work. In addition, teachers who achieve National Board Certification while participating in the program should be an indicator of program effectiveness in improving teacher capacity.

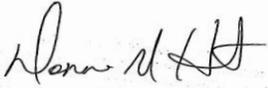
Question 4. What should the Department require regarding rigorous, independent State evaluations of the program given limited State-level administrative funds?

The Department should use surveys and self reports. Teams of expert teachers and administrators in the program should be used to make site visits to schools to evaluate what is being accomplished using observations and surveys. This would provide for sharing ideas and

approaches as well as program evaluation. It would be both a professional development and an assessment event.

Thank you for your consideration of the above comments. Should you have any questions or need clarification, please do not hesitate to contact Barbara Kapinus at bkapinus@nea.org or 202-822-7386

Sincerely,

A handwritten signature in black ink, appearing to read "Donna Harris-Aikens". The signature is fluid and cursive, with the first name being the most prominent.

Donna Harris-Aikens, Director
NEA Education Policy and Practice



November 19, 2010

Office of Elementary and Secondary Education
Attn: Striving Readers Public Input Meeting
U.S. Department of Education
400 Maryland Avenue, SW, Room 3E230
Washington, DC 20202

Dear Secretary Duncan:

The National Council of Teachers of English (NCTE) appreciates the opportunity to provide feedback on the development of a State competition under the Striving Readers Comprehensive Literacy Program. The following are NCTE's recommendations.

SEA and LEA Capacity and Support

1) A State Literacy Plan must be coordinated across academic levels. **Districts need to organize within and across their schools for a cohesive program of literacy instruction across content areas.** Districts need to publish for one another their district literacy plans so that districts can learn from one another, so that states get best results from their investment in state planning, and so that colleges and universities are alert to the literacy goals and practices of every district in their state. States can convene the diverse members of their State Literacy Team and district representatives, including classroom teachers, on a regular basis for mutual education and analysis of outcomes of specific literacy instruction practices in their literacy programs.

A State Literacy Plan should include an instructional media emphasis that relates to the National Education Technology Plan. Professional development for teachers is essential for using social media and computing in literacy instruction. Research abounds about the positive uses of media that are part of the workplace and of the everyday lives of people: writing and reading are changed inexorably because of media. A state that cares about students' being engaged and being ready for college and careers must include in schools literacy practices that are part of life beyond schools.

2) International benchmarks have been cross referenced to current state standards and to the Common Core standards. **Attention, however, must be paid to the conditions in countries whose students are performing to higher standards than students in the United States: for example, teachers are central in decisions about curricula and assessments, and teachers engage in continuous learning through professional development.**

States can tap into resources being developed by professional associations to aid teachers in helping students meet new standards of any kind. **A cost effective way to help teachers be aware of standards and to develop teaching strategies and materials is to coordinate with professional associations that are the intermediaries between policy and practice.**

2) **Caregivers and teachers of children birth through age five must know the signals of early literacy development and know strategies to encourage the early literacy practices.** Child caregivers and teachers in pre-kindergarten programs need knowledge that can be verified through evidence of effect and/or certifications. Childcare centers and preschools can be licensed only if their programs include research-based activities that promote literacy and provide information for parents.

3) Schools must integrate literacy instruction into core subject areas to promote learning of the subject and to increase motivation to read and write in the subject area. In the Principles for Learning committed to by the Connected Learning Coalition (NCTE, NCTM, NSTA, NCSS, CoSN, and ACTE), the first principle is that literacy is the foundation of all content areas. **Three provisions regarding literacy in all content areas of each subgrant proposal should be:**

- **Common planning time for teachers across content areas to develop literacy practices**
- **Problem based learning across content areas**
- **Professional development for using technologies that support learning goals**

Most important for coordinating literacy instruction across content areas is common planning time during the school day for teachers in various content areas. States that require evidence that districts mandate or will mandate in middle and high schools common planning periods each week set the stage for more coordinated curricula and more positive outcomes in literacy learning.

Project-based learning that engages adolescent learners in real world problem solving has been shown in research to engage adolescents in improving their literacy skills because they care about solving actual problems and writing about their solutions for audiences beyond their classroom teacher. Because solution of real world problems demands application of multiple kinds of knowledge, the mandate for coordinated planning with allotted time for teachers to do so contributes to retaining adolescent students, from the least to the most literate.

Research shows that adolescents think, plan, learn, and communicate through technologies that are omnipresent in their lives. **States must set the conditions for these technologies to support learning in schools so that adolescents see school as relevant to their lives.** The National Education Technology Plan supports both the technical aspects of this move to modernity and the learning aspects. **States should describe in specific terms how they will support districts in providing professional development in the kinds of curricula, assignments, and assessments that use technology in the most effective ways.** Karen Cator recently stated that teachers need professional development in designing assignments and can rely on students for help with the technology, so long as the technology is supplied and/or sanctioned by the district. **State Literacy Plans, therefore, can require that districts work out appropriate technology conditions for their setting and provide adequate professional development to their teachers in using media for literacy opportunities for students.**

Professional Development, Instruction, and Assessment

1) Essential components of high-quality literacy-related professional development in a subgrant proposal should include:

- **Yearly plan to supply teachers on a regular basis current information about how people learn, including how they learn to read and to write, in forms that are accessible and applicable to the context of the district**
- **Development of teacher communities of practice within schools and across schools, especially hybrid models of face-to-face and online interactions, around topics critical to the district**
- **Regular opportunities for teachers across content areas to examine student work together in order to examine curricular content, teaching strategies, and student accomplishments**
- **Means for teachers to provide learning opportunities for one another on a regular basis throughout the school year during the school day, rather than over reliance on costly “outside experts”**

3) Assessing is part of learning. Formative assessment, defined as teacher and student practices that on a day-to-day basis reveal strengths and weaknesses for immediate refinement of instruction and learning, is an essential part of learning. **Subgrant proposals should include evidence of professional development for teachers in generating and using formative assessment, evidence of tracking the use of formative assessment outcomes for modifying instruction when indicated, and evidence of including parents and guardians in understanding the formative assessments that are part of their children’s learning.**

Children and youth improve literacy by doing reading and writing. They will improve with opportunities to read and write that mean something to them and, therefore, motivate them. An assessment system described in a subgrant proposal should include description by a district of the range of opportunities in multiple content areas that students have instruction in, feedback on, and opportunity to present their learning from reading and writing.

4) **Each subgrantee should have a protocol for assessing student performance which leads to informed instructional decision.** The most important way to collect, analyze, and use data regarding literacy is to focus on student performance. Multiple choice tests do not reveal the range or depth of learning in reading and writing, especially in writing. Districts that use performance assessments and focus on actual student work to determine ways that students are improving in literacy will get accurate pictures of the importance of developmental stages and of multiple kinds of literacy development. **Subgrant proposals should include from districts the ways in which actual student work will be analyzed by teachers to improve instructional practices.**

Evidence and Evaluation

1) **Districts should show already established practices like those described above or concrete plans for their implementation.** For example, evidence can be in teacher descriptions of a cycle of work, such as a formative assessment cycle of analysis, change in practice, further analysis, evidence of improved student learning outcomes, and so on. Evidence can be in a collective report from teachers in a district about the effects of common planning periods on their ability to provide literacy instruction in their subject area. **Teachers, rather than just administrators, should be shown to be engaged throughout the district in the district’s**

efforts to provide evidence of solid literacy instruction. Investment in change will be warranted only if teachers are engaged.

Early learning providers should provide descriptions of curricula that demonstrate literacy activities appropriate for the age of the children being served and evidence that the curricula are enacted. Their descriptions should show awareness of the range of opportunities for supporting young children in physical, mental, and emotional conditions necessary for advancing literacy. State Literacy Team experts in early childhood education can help with judging the adequacy of early learning provider knowledge of and programs in literacy development.

2) A subgrantee's selection of ways to monitor program implementation and outcomes to inform continuous program improvement should be included in its application. **All plans should include collaborative examination of actual student work by teachers on a regular basis.** States might duplicate district practice by having their State Literacy Teams periodically convene with subgrantees to examine student work selected as evidence of making progress on stipulated literacy goals, such as for adolescents improved writing in content areas, reading and understanding complex texts, and effective problem solving.

3) **Teachers, coaches, principals, and administrators should report changes in practice that emerge during and from professional development activities.** For example, teacher, coach, and administrator portfolios are an effective way to document, reflect on, and report growing professional practice in support for literacy development in students. Development is a key word, as these professionals continue to be learners, essential with changing student populations, explosion of new technologies, expansion of research findings about the way people learn to write and to read, need to understand content areas other than their own, changes in workplace conditions that students will enter, and global connections.

Sincerely,

A handwritten signature in black ink that reads "Barbara Cambridge". The signature is written in a cursive, flowing style.

Barbara Cambridge, Ph.D
Director, Washington Office
National Council of Teachers of English

From: Annette Zehler [azehler@cal.org]
Sent: Friday, November 19, 2010 5:19 PM
To: Striving.Readers.Comprehensive.Literacy
Subject: Striving Readers Public Input

Written Input

Striving Readers Comprehensive Literacy State Grant Program Public Input

Input on: Meeting the Needs of Diverse Learners

Question 1. How can a State best ensure that its comprehensive literacy plan will effectively address the needs of economically disadvantaged children and youth, limited-English-proficient children and youth, and children and youth with disabilities?

Response-- focus on Limited-English-proficient children and youth:

The use of a variety of technology-based resources, including software and online programs and digital tools for working with content, is increasingly a part of instructional practice. State comprehensive literacy plans should address the integration of technology into instruction in ways that will promote growth in language and literacy skills for all students. In particular, State plans should incorporate guidance that emphasizes the importance of not only examining *what* technology-based resources are selected but carefully considering *how* these resources can be used to support the meaningful participation of English language learner students, in ways that provide opportunities for students to build their oral language and literacy skills.

Annette M. Zehler, PhD
Senior Research Associate
Center for Applied Linguistics



MEMORANDUM

To: Dr. Thelma Meléndez de Santa Ana, Assistant Secretary for Elementary and Secondary Education

From: Mariana Haynes, Ph.D., Senior Fellow, Alliance for Excellent Education
Donald Deshler, Ph.D., Director, University of Kansas Center for Research on Learning
Michael Hock, Ph.D., Associate Director of the University of Kansas Center for Research on Learning

Subject: Striving Readers Public Input

Date: November 19, 2010

The following is submitted in response to the Department of Education's request for input regarding the Striving Readers Comprehensive Literacy grant competition. For additional information, please contact Mariana Haynes, Senior Fellow, Alliance for Excellent Education, at mhaynes@all4ed.org or 202-828-0828.

SEA and LEA Capacity and Support

1. What should states be considering in their state literacy plans (SLPs) to ensure effective literacy and language development and instruction? For example, what are the core components of a state literacy plan? What roles and capacities should states have or develop in order to effectively support sub-grantees in carrying out substantial improvements in literacy and language development, teaching, and learning?

Federal funding should enable states to design a comprehensive literacy plan that spans birth through grade twelve. Funds should support sub-grants to school districts to develop and implement high-quality literacy initiatives that improve the literacy skills of all students as well as provide a continuum of differentiated supports—both classroom-based and appropriate, systematic and intensive one-to-one and small group instruction—for struggling readers. The approach should be well-integrated into the state's major improvement efforts and coordinated by dedicated staff within the SEA and the LEAs. The plans should target funding to high-need student populations and schools and require a strong evaluation

component on the initiative's impact on students' literacy achievement.

States must ensure that Local Education Agencies (LEAs) have the capacity and supportive systems in place that directly impact implementation of promising practices. For example, effective instruction requires site-based administrative support AND direct involvement. Roles should be identified and duties defined. Support for extensive, job-embedded ongoing professional development (PD), planned and regular follow-up sessions with classroom visits, and on site coaching capacity are critical elements of successful literacy development and instruction. Finally, outstanding teachers must be recruited to participate in the state literacy plans at the planning and instructional level. Thus, critical roles and capacities include site-based administrative support/involvement, extensive PD and coaching, and involvement of talented instructional staff. These factors are needed to support the implementation of feasible and effective interventions.

The state should broker and coordinate services from regional agencies, higher education institutions, intermediaries, and other organizations to enhance the state and local capacity to develop and successfully implement literacy plans. A major focus must be on developing a needs assessment, a capacity survey, and an implementation plan that integrates program design and implementation with educational policies over which states exercise authority such as setting standards and assessments, program approval for preparation programs, and teacher and leader licensure and development. The state should promote using research-based practices to improve reading and writing, ensure integration of literacy instruction within content areas, evaluate the impact of programs and interventions to improve literacy instruction, and provide high-quality, research-based professional development for teachers, coaching staff, curriculum specialists, and school leaders.

Funding should support states and districts in using longitudinal data systems to track students' achievement and on-track indicators to ensure students are advancing toward college- and career-readiness. States should work with districts to create a culture of data-based decision-making that supports leaders and teachers in identifying students who are struggling to read and write at grade level and need extra instruction and supports. State Education Agencies (SEAs) and LEAs should foster the use of formative and diagnostic measures to provide meaningful information on how to improve student learning and achievement.

2. How can this program most effectively support states' and LEAs' transition to new internationally-benchmarked college- and career-ready standards held in common by multiple states, as well as their alignment with state early learning standards?

The focus needs to be on improving the quality of instruction and teacher content knowledge in a way that improves outcomes for all students, especially special needs populations, served in content classes. The grant program should encourage the effective implementation of the English language arts Common Core State Standards and aligned common assessments that provide measures of student growth to strategically support their progress and determine if students are on track toward college- and career-readiness. As part of a college- and career-ready agenda, states must set high standards

with corollary assessments to establish expectations for literacy performance within content areas so that literacy instruction is integrated into general education curriculum and coursework throughout schooling. The Common Core State Standards along with aligned assessments can serve as a bold first step to raise the level of literacy achievement for all students in the United States. Since the 1960s, there has been a steady decline in the difficulty and sophistication of the content of the texts students have been asked to read. To reverse this trend, the proposed English language arts Common Core State Standards require that students receive extended exposure to subject-area text as part of grade six to twelve standards for literacy in history, social studies, and science.

Yet, it is clear, that *without commensurate supports* to help those students who lack the foundational skills to respond to the raised standards, large numbers of adolescent learners will lack the literacy skills needed to succeed in the modern workplace. Over the last thirty-seven years, the literacy performance of thirteen- and seventeen-year-olds on the National Assessment of Educational Progress has remained stunningly low, revealing that nearly six million of the twenty-two million American secondary students are struggling to read and write.

States should strengthen teacher education and licensure through the design of performance-based systems that ensure that teachers acquire competencies in literacy instruction. Teacher education and traditional licensure exams have come under attack for failing to provide meaningful accountability for teacher effectiveness. State plans should address the development of teacher performance standards that align to the Common Core State Standards and integrate content knowledge and literacy pedagogy. Measures of teachers' performance can serve a number of policy purposes to strengthen the quality of preparation and credentialing programs, induction for new teachers, and professional learning and licensure. This includes holding teacher education programs accountable for the competency of elementary and secondary level teachers in integrating literacy instruction throughout content-area curricula and linking preparation with P-12 outcomes.

3. How can SEAs and sub-grantees best leverage the use of funds under the Elementary and Secondary Education Act (ESEA), the Individuals with Disabilities Education Act, and the Perkins Career and Technical Education Act, as well as other federal, state, and local funds, for effective literacy development and instruction?

These programs and funding streams need to be aligned with a site-based framework that supports instruction for all students. Multi-tiered systems provide one way to look at the entire array of program options that should be available in a LEA setting. And the framework must be workable and acceptable for both general and special education.

These systems provide a comprehensive program that includes evidence-based instruction, universal screening, progress monitoring, research-based interventions matched to student needs, and educational decision-making using student data on learning and performance.

Transition and Alignment Across Birth Through Grade 12

1. How should states and LEAs assess their needs in order to effectively target the funds to appropriately support literacy and language development for children from birth through grade 12?

Significant student and school outcomes must be identified and targeted. Data systems must be in place and be usable, informative, and tied to the identified outcomes. Only when targets have been identified, assessment systems are in place, and assessment is ongoing can states assess LEA needs. Thus, a first step in SEA support would be to help LEAs become a data analytic organization.

3. How can sub-grantees ensure that the needs of adolescent learners will be met under this program? Specifically, how can sub-grantees ensure that schools integrate effective literacy development and instruction into core subject areas and increase motivation and interest in reading and writing?

Sub-grantees should: (1) make certain that the amount of resources devoted to secondary school students is commensurate to that which is allocated to early childhood and elementary schools students, (2) resist the tendency to take instructional practices appropriate for Kindergarten through grade 4 students and impose them on secondary school students, (3) recognize that meaningful change takes time and must transcend any published program, (4) acknowledge that scalability is very difficult – to be successful one must resist the tendency to follow a —one-size-fits-all approach, and (5) carefully tend to the issues of transitioning kids from elementary to middle school and middle school to high school. A great deal can be lost in the transition process.

States should improve student achievement in grades 4-12 by establishing adolescent literacy initiatives that provide explicit and systematic instruction in literacy across the curriculum. States and districts should provide high-quality professional development for all secondary level teachers, school leaders, specialists, and literacy coaches in research-based literacy instruction that is aligned to the National Staff Development Council Standards. On-going, job-embedded professional development and other support should focus on the characteristics of effective literacy and the special knowledge and skills to teach reading, writing, speaking, and listening effectively as part of content-area learning.

States must ensure that LEAs have the capacity and supportive systems in place that directly impact implementation of promising practices. For example, effective instruction requires site-based administrative support AND direct involvement. Roles should be identified and duties defined. Support for extensive, ongoing professional development, planned and regular follow-up sessions with classroom visits, and on-site coaching capacity are critical elements of successful literacy development and instruction. Finally, outstanding teachers must be recruited to participate at the planning and instructional level. Thus, critical roles and capacities include site-based administrative support/involvement, extensive PD and coaching, and involvement of talented instructional staff. These factors are needed to support the implementation of feasible and effective interventions.

High-quality reading instruction and assessment should be a cohesive system that encompasses iterative cycles of assessment and instruction. Attention must be given to using evidence-based reading and writing strategies shown to impact student engagement and achievement. These include: direct and explicit comprehension instruction; direct and explicit instruction that builds academic language; use and availability of diverse texts at the reading and interest level of students; multiple opportunities to write with clear purposes and critical reasoning appropriate to the topic and purpose

and with specific instruction and feedback; motivation and self-directed learning; extended time and opportunities for intense intervention, instruction, and practice; text based collaborative learning; systematic strategic, individual and small group instruction, including intensive one-on-one intervention for students reading significantly below grade level, which can be provided both inside and outside the classroom as well as during and outside regular school hours; instruction in uses of technology for research and for generating and presenting content and ideas; and instruction in integrating multimedia elements, including graphics, sound, and animation, and conventional text; use of screening, diagnostic, formative, and summative assessment; and coordinated involvement of school leaders and teacher literacy teams that are interdisciplinary and interdepartmental and that analyze student work and plan instruction.

Professional Development, Instruction, and Assessment

1. What are the essential components of high-quality literacy-related professional development? What aspects, if any, should be considered essential in a successful sub-grant proposal?

First, PD content is critical and must be responsive to needs identified by the LEA including teaching staff. PD must reflect needs identified by data analysis and be tailored to the needs of specific teachers. PD must be delivered in a highly interactive way that solicits input from staff, respects their knowledge, and involves them in planning for implementation. Second, PD must include follow-up that involves classroom observation and teacher feedback. Follow-up must include opportunities for teachers to critique interventions and offer suggestions for intervention improvement that is responsive to the context of the LEA. Finally, PD must include instructional coaching that is responsive to classroom contexts and individual teacher needs. The use of video analysis of teaching by teachers is a very promising practice in terms of getting teachers to recognize their individual strengths and weaknesses. On-site coaching should include online/distance coaching that makes coaching more cost effective and responsive to teacher needs.

The common core English language arts standards require that students receive extended exposure to subject-area text as part of grade 6–12 standards for literacy in history, social studies, and science. Content-area teachers will need to do much more to foster students' abilities to read technical text, subject-matter material, and digital content independently. Substantial evidence has identified a number of effective reading and writing strategies that can be applied across content areas. For example, in reading these include: cooperative learning, generating and answering questions, reciprocal instruction, identifying similarities and differences, non-linguistic representations, setting purposes and providing feedback, and summarizing and notetaking. Strategies that impact writing achievement and reading comprehension include: collaborative writing, sentence combining, and writing for specific product goals.

Teachers will need extensive training and guidance on how to use ongoing formative assessment to identify which skills to emphasize and how to teach them depending on the individual needs of adolescent learners. Recent studies and surveys of secondary school teachers' knowledge about reading development and difficulties show that many are not prepared to teach or incorporate literacy

strategies into subject area coursework. Providers of professional development should be responsible for providing evidence of impact on teaching practice and student learning.

3. What are the critical elements of an integrated, age-appropriate assessment system for identifying the strengths and weaknesses of children and youth and improving literacy development and instruction?

Aligned assessments should be based upon Universal Design of Learning principles and include multiple elements that can provide information on student literacy achievement at different grain sizes. States should develop systems that include performance measures that assess literacy performance within content-area learning along with screening, formative, and diagnostic tools that can identify students' needs and inform instruction and interventions. Teachers need to be able to determine how much students know and can do—as well as identify where they might be struggling and why—and modify instruction accordingly. Ensuring students' literacy achievement depends upon using frequent classroom measures to gauge students' progress and adjust instruction and curricula based on the results.

4. What are the most important ways to collect, analyze, and use data to improve literacy development and instructional practices and child and youth outcomes in early learning settings and in schools?

States should support LEAs in the gathering of reliable data on the effects of interventions on student literacy achievement. Data systems can also link student outcomes to programs and interventions that can be used for improving educator effectiveness and program improvement. Plans should encourage a culture of data-based decision-making that supports leaders in their efforts by encouraging (1) the differentiation of literacy improvement approaches based on individual school challenges and needs, (2) the use of a range of early warning and on-track measures to assess individual student's literacy performance and progress toward graduation and college- and career-readiness and inform interventions to get off-track students back on track, and (3) the use of formative and diagnostic assessments to provide meaningful information on how to improve students' literacy achievement.

Evidence and Evaluation

1. In order to have a rigorous competition and make high-quality sub-grant awards, what evidence should states require sub-grantees to put forward in their applications? How can early learning providers demonstrate a "record of effectiveness," as required in the Act?

The record of evidence should not result in alteration of interventions, intensity of instruction, and lower dosage due to research design factors. For example, randomized control trial (RCT) protocols are often disruptive to the instructional process and can result in delays in delivery of interventions, disruptive scheduling, student dissatisfaction with learning in general, and low teacher morale. Whatever design is required must be nonintrusive to the instructional process. Currently RCTs are often clearly detrimental to the instructional process and student outcomes. In addition, required designs must recognize the fallacy of —one-size-fits-all mentality of some current —rigorous designs. Given that context influences implementation and teacher skill/knowledge also impacts student outcomes, designs must allow for creative adaptations at the LEA level.

3. What strategies should states and sub-grantees implement in order to monitor and evaluate the effectiveness of job-embedded, ongoing professional development for teachers, coaches, principals, and administrators?

In addition to data on student growth in literacy achievement, information should be collected to determine the impact of professional development on teaching practice. As recommended by the National Staff Development Council, states and district plans should call for evaluation that focuses on teachers' acquisition of new knowledge and skills, how that learning affects teaching, and in turn, how those changes in practice affect student learning.

4. What should the Department require regarding rigorous, independent state evaluations of the program, given limited state-level administrative funds?

We need to look at technology driven assessment systems that support continuous and real-time data collection.

From: Laura Lou Meadows [captionsliteracy@hotmail.com]
Sent: Sunday, November 21, 2010 9:31 AM
To: Striving.Readers.Comprehensive.Literacy
Subject: Speech given at Nov 19,2010 Public Input Meeting by Captions for Literacy

Speech to Department of Education

November 19, 2010

My name is Laura Meadows and I am Executive Director of Captions for Literacy, a charitable trust. With me is our Director, Jack Taggart.

We are most grateful to the Department of Education for establishing its Striving Readers Comprehensive Literacy State Grant Program and for giving organizations such as ours a chance to comment on the design of such a program.

The mission of Captions for Literacy is to bring to the attention of the general public the overlooked value of using TV captions to improve reading ability.

Opening free TV captions provides a powerful opportunity for those watching to connect the sound of the spoken word with the sight of the printed word in the context of the action unfolding on the screen to explain or reinforce the meaning. Television becomes a free reading practice resource.

There are several aspects of such a grant program that we believe need to be considered.

First, don't require that all grant applications include "rigorous scientific research". In the case of TV captions, and perhaps other applicants, over 25 years of research has been done showing their value for learning to read. What is needed now is dissemination of the results of this research to the public.

Second we urge that the Doing What Works web site mention the value of TV captions. Finally, use this grant program to encourage states to build the use of TV captions into their literacy programs.

Studies show that, on average, children watch television many hours a day, thousands of hours every year, often more hours that they spend in classrooms. With television present in 98% of American homes, it means that the use of TV captions to help learning to read is easily scalable.

It is tragic to waste this opportunity to use priceless free TV captions while NAEP reports that over 50% of black and Hispanics fail to learn to read at the basic level by the 4th grade.

Not everybody will benefit from TV captions. But millions will.

Striving Readers mtg. 11/19/10
Written Comments

1. Will states be required to provide matching funding? If not, will there be another way to ensure sustainability of outcomes beyond the initial grant period (and provide a greater long-term return on the investment)?
2. Will states be required to distribute sub-grant awards to LEAs in proportion to the Title I formula for those LEAs, or will states be allowed to make ~~the~~ award decisions based upon LEA need as expressed within their proposal?

Thomas Santangelo
Virginia Department of Education