

CENTER FOR DYSLLEXIA, DIVERSE LEARNERS, AND SOCIAL JUSTICE
GRADUATE SCHOOL OF EDUCATION AND INFORMATION STUDIES
2123 MOORE HALL
UNIVERSITY OF CALIFORNIA, LOS ANGELES
LOS ANGELES, CALIFORNIA 90095-1521

April 12, 2024

Commission on Teacher Credentialing
State of California
1900 Capitol Avenue
Sacramento, CA 95811-4213

Re: Complaint Regarding Program Approval for an Institution of Higher Education to Offer the Multiple Subject Program

Dear Commissioners of the California Commission on Teacher Credentialing:

The *Literacy Standard and Teaching Performance Expectations for Preliminary Multiple Subject and Single Subject Credentials* (Standard 7) represents a consensus among the many perspectives and stakeholders that comprise California's diverse communities, families and student populations. Standard 7 is grounded in California's *English Language Arts (ELA)* and *English Language Development (ELD) Standards* and aligns with the *English Language Arts/English Language (ELA/EDL) Framework*. In addition, Standard 7 incorporates critical elements of the *California Comprehensive State Literacy Plan*, including principles of equity, diversity, and inclusion, Multi-Tiered Systems of Supports (MTSS), integrated and designed ELD, the *California Dyslexia Guidelines*, Universal Design for Learning (UDL) and assessment for purposes of screening and identification of potential reading difficulties.

Organized around the themes of the *ELA/ELD Framework* (Foundational Skills, Meaning Making, Language Development, Effective Expression, and Content Knowledge) the literacy standards explicitly connect teacher education to state adopted curriculum frameworks and provide guidelines for the preparation of teacher candidates in effective literacy practices. In accordance with SB488, Standard 7 recognizes the importance of teaching foundational reading skills as well as the role of tiered reading instruction in meeting the needs of multilingual learners, English learners, and learners with disabilities including dyslexia. Finally, Standard 7 reflects current research on assessment practices (e.g., screening, progress monitoring) and the provision of evidence-based reading instruction (e.g., asset-based pedagogies, structured literacy). As members of the work group that developed the literacy standards and teaching performance expectations, we are familiar with their content and intent and committed to supporting their implementation in teacher education.

The complaint, filed by Decoding Dyslexia of California, California Reading Coalition, and Families in Schools, argues that the MCNU program does not comply with Standard 7, noting instructional practices (e.g., guided reading, running records) as not evidence-based. In their response, MCNU cites studies supporting the efficacy of these practices, as well as an explanation of what they identify as “balanced literacy”, an approach that is particularly prominent in the MCNU program. Balanced literacy appears as the theoretical and practical framework in *EDUT 6106* and the focus of all four weeks of instruction in *EDUT 6108*, with a major assignment in this course a balanced literacy lesson plan. MCNU references Castles et al. (2018) in support of balanced literacy approaches. However, in this same article Castles and colleagues also note the following: “The term balanced literacy is in widespread use, often to describe programs with “a bit of everything” and typically involving limited and nonsystematic phonics instruction (see P. Snow, 2017).” After examination of the MCNU documents, it does not appear that the program provides sufficient coverage of Foundational Skills (Program Standard 7a. and TPE 7.5).

In addition, the MCNU program’s attention to reading assessment appears limited to a reference to running records and the design of a literacy assessment tool (*EDUT 6106* – week 3) and the use of a spelling inventory in the Word Work assignment in *EDUT 6108*. We find little instruction related to ongoing progress monitoring or use of other assessment techniques or measures. Furthermore, screening to determine a learner’s literacy profile or to identify possible literacy difficulties is not mentioned in the syllabus. This is a critical omission, given California’s recent screening mandate. Lacking too, in the documentation provided, is any coverage of Multi-tiered Systems of Support (MTSS) and Tier 1, Tier 2, and Tier 3 literacy instruction (TPE 7.2). MTSS as well as an understanding of the principles of Universal Design for Learning (UDL), provide specific approaches and tools for meeting the needs of all learners, an integral element in Standard 7.

Taking these observations and all other evidence into consideration, the Commission must determine if the MCNU Multiple Subject Program aligns with Program Standard 7 and its corollary, that MCNU teacher candidates will be prepared to meet Domain 7 Teaching Performance Expectations. The Commission has an opportunity to set an important precedent with this action item by upholding the spirit of Program Standard 7 and ensuring that the future teachers of California are well-prepared to teach language and literacy.

One of the actions available to the Commission is the provision of technical assistance. This is the work we have undertaken individually and collectively in support of Standard 7. It includes keynote addresses, professional workshops, and conference presentations, and in collaboration with reading faculty from across the state, the development of resources, including those for mentor teachers and university supervisors. An ongoing effort is the design and dissemination of a series of freely accessible E-learning modules, that are focused on identifying, assessing, and teaching students with reading difficulties, including dyslexia. The modules align with elements of Program Standard 7 and Domain 7 TPEs.

The Commission is commended for prioritizing literacy in teacher education by adding Program Standard 7: *Effective Literacy Instruction for All Students*, a rigorous and comprehensive set of requirements which reflect current research in reading research and practice. While alignment with Standard 7 will likely demand that some programs add content and others reexamine/replace content, we anticipate, given the scope of Standard 7, that all programs will need to include Program 7 requirements in multiple courses within a program.

We also anticipate, that for candidates to meet the TPEs, extensive coverage of this content will be necessary: i.e., multiple supportive readings and resources (Introduce); numerous scaffolded assignments (Practice); and evaluation of competencies within coursework and across fieldwork settings (Assess). The program accreditation process, including but not limited to, review of syllabi and course matrices, and interviews with faculty, administrators, and students, is extremely time-consuming. We are grateful to the Committee on Accreditation for assuming this critically important task.

Acknowledging the multiple issues and considerations that must be taken into account, we thank you for approving and upholding Standard 7.

Maryanne Wolf

A handwritten signature in dark ink that reads "Maryanne Wolf". The script is fluid and cursive, with the first name and last name clearly legible.

(former John DiBiaggio Professor of Citizenship and Public Service)
Professor-in-Residence
Director, Center for Dyslexia, Diverse Learners, and Social Justice
School of Education and Information Studies
University of California, Los Angeles
Presidential Fellow, Chapman University
Academician, Pontifical Academy of Science
Maryanne@maryannewolf.com

A handwritten signature in dark ink that reads "Sue Sears". The script is elegant and cursive, with the first name and last name clearly legible.

Sue Sears
Professor, Department of Special Education
Coordinator, Teaching, Learning, & Counseling Consortium
Michael D. Eisner College of Education
California State University, Northridge