

April 16, 2024

California Commission on Teacher Credentialing  
1900 Capitol Avenue  
Sacramento, CA 95811-4213  
Re: Complaint Regarding Program Approval for an Institution of Higher Education

Dear Commissioners:

My name is Matthew Burns and I am a reading researcher at the University of Florida. My expertise focuses on assessing the learning needs of students and using those data to drive instruction and intervention.

I have conducted multiple studies regarding the *Fountas & Pinnell Benchmark Assessment System* (BAS) and have studied the effects of instructional programs and intervention that use the BAS results in unreliable data and invalid decisions, and that instruction framed around the Fountas and Pinnell guided reading framework does not teach foundational skills to children. Thus, guided reading and the assessments within that framework, including a running record based on what is commonly referred to as the three-cueing system, should have no place in public education, and should not be part of any preservice training.

I quite surprised to see guided reading and three-cueing included in the syllabus of a course for preservice educators, and even more shocked that the syllabus would be submitted by Mills College-Northeastern University (MC:NU) as part of its application for program approval. I applaud the Commission for its high expectations for program alignment for teaching and learning. There is a solid research base regarding what is (and is not) effective for children when it comes to reading assessment and instruction, and that research base is not reflected in the proposed syllabi. It is my professional opinion that **MC:NU failed to comply with the required elements of Standard 7 of the Literacy Standard for the state of California.** It is also my opinion that the complaint raised by Decoding Dyslexia of California, California Reading Coalition, and Families in Schools is valid and should be given immediate consideration.

I am happy to provide research supporting my opinion of needed or to expand upon any of these points. Thank you for prioritizing literacy and enforcing rigorous standards that will improve reading outcomes for California's children.

Sincerely,



Matthew Burns, Ph.D.  
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Assistant Director, UFLI  
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