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# 3C

## Action

### *Educator Preparation Committee*

### **Complaint Regarding Program Approval for an Institution of Higher Education to Offer the Multiple Subject Program**

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**Executive Summary:** This item presents for Commission consideration and action a complaint submitted regarding the Committee on Accreditation's approval of Mills College at Northeastern University's Preliminary Multiple Subject program.

**Recommended Action:** That the Commission discuss and take one of three actions as outlined in the *Accreditation Framework* and presented on page 2.

**Presenter:** Cheryl Hickey, Administrator, Professional Services Division

### **Strategic Plan Goal**

#### ***Educator Preparation and Advancement***

- **Goal 1.** Educator preparation programs hold candidates to high standards and adequately prepare them to support all students by using culturally and linguistically responsive and sustaining practices in equitable, inclusive, and safe environments.
  - A. Set and uphold rigorous standards for educator preparation programs.
  - C. Enact a rigorous accreditation process that ensures programs meet standards and are effective in preparing educators for public schools.

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# Complaint Regarding Program Approval for an Institution of Higher Education to Offer the Multiple Subject Credential Program

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## Introduction

This item presents for action a complaint received regarding the approval of the Preliminary Multiple Subject program proposal submitted by Mills College at Northeastern University. This program was approved by the Committee on Accreditation (COA) at its [January 25, 2024](#) meeting.

## Background

On February 20, 2024, the Commission received the complaint from Decoding Dyslexia of California, California Reading Coalition, and Families in Schools contained in this agenda item as Appendix A. The letter was provided to Mills College at Northeastern University. The response from Mills College at Northeastern University is provided in Appendix B.

## *Summary of the Initial Program Approval Process*

The Commission's process for approval of new programs is guided by both the *Accreditation Framework* and the *Accreditation Handbook*. Proposals are received by the Commission staff from institutions seeking to offer a new credential program or authorization. These proposals include responses to all relevant preconditions, a response to the Common Standards designed specifically for new programs, and finally, the institution's response to the program standards. Specific information is required to be submitted for all new program proposals such as syllabi and candidate handbooks.

External subject matter expert reviewers, including members of the Commission's Board of Institutional Review, review specified materials submitted by the institution. If more information is needed to make a determination regarding the program proposal's alignment with the relevant standards, feedback is sent to the institution. The institution then responds with the additional information needed, and this iterative process is repeated until reviewers have determined that the proposed program is aligned to all of the relevant preconditions and standards. Upon a determination by the reviewers that the proposed program is aligned to the preconditions and standards, it is moved forward to the Committee on Accreditation (COA) for its consideration and potential approval at a scheduled public meeting. All program proposal materials and feedback forms are provided to the COA. The institutional representatives are invited to the public meeting to respond to any questions from the COA members. The COA then votes to approve or deny approval for the proposed program.

## *Roles of the Commission and the Committee on Accreditation*

Education Code section 44372 sets forth responsibilities of the Commission as it relates to the accreditation of educator preparation. They include the following:

- a. Adopt and implement an accreditation framework, which sets forth the policies of the commission regarding the accreditation of educator preparation in California.

- b. Establish and modify credential-specific standards, experimental program standards, and alternative program standards, as defined in the adopted accreditation framework.
- c. Rule on the eligibility of an applicant for accreditation when the applying institution has not previously prepared educators for state certification in California, pursuant to subdivision (a) of section 44227.
- d. Appoint and reappoint the members of the Committee on Accreditation in accordance with section 44373, by selecting among nominees submitted by a panel of distinguished educators.
- e. Review periodic accreditation reports by the Committee on Accreditation and refer accreditation issues and concerns to the committee for its examination and response.
- f. Hear and resolve appeals of accreditation decisions, pursuant to subdivision (e) of section 44374.\*
- g. Allocate resources annually for implementation of the accreditation system.
- h. With the Committee on Accreditation, jointly design an evaluation of accreditation policies and their implementation.
- i. Inform and advise the Legislature regarding statutory issues related to accreditation, and submit legislative recommendations, after considering the advice of the Committee on Accreditation, educational institutions, and professional organizations.

*\*Section 44374 (e) relates to the appeals by institutions.*

Education Code section 44373 (c) sets forth the responsibilities of the Committee on Accreditation. These include the following:

- 1. Make decisions about the accreditation of educator preparation. The committee's decision making shall be in accordance with the accreditation framework.
- 2. Make decisions about the initial accreditation of new programs of educator preparation in accordance with procedures established by the committee.
- 3. Determine the comparability of standards submitted by applicants with those adopted by the commission, in accordance with the accreditation framework.
- 4. Adopt guidelines for accreditation reviews and monitor the performance of accreditation teams and other aspects of the accreditation system.
- 5. Present an annual accreditation report to the commission and respond to accreditation issues and concerns referred to the committee by the commission.

### **Accreditation Framework**

Section 5 of the [Accreditation Framework](#) guides the handling of complaints by individuals. The *Accreditation Framework* provides for three possible courses of action that the Commission may take with respect to complaints about an educator preparation program. They are:

- 1. Investigate the basis for the concern
- 2. Provide technical assistance
- 3. Refer the concerns to the Committee on Accreditation for consideration and possible action

### **Staff Recommendation**

Staff recommends that the Commission discuss the information in this agenda item and take one of the three actions outlined in the *Accreditation Framework* and presented above.



CALIFORNIA  
READING  
COALITION



February 20, 2024

Committee on Accreditation

1900 Capitol Avenue

Sacramento, CA 95811

Via email: [accreditation@ctc.ca.gov](mailto:accreditation@ctc.ca.gov)

**Re: Mills College at Northeastern University (MC:NU) Preliminary  
Multiple Subject Program Approval**

Dear Committee on Accreditation:

On behalf of the organizations listed below, we are writing you with respect to [Agenda Item 7](#) from the January 25, 2024, Committee on Accreditation (COA) meeting in which the COA voted to unanimously grant Initial Program Approval to MC:NU's preliminary Multiple Subject program.

We would like to file a formal compliance complaint with the COA as this new educator preparation program does not comply with the current [literacy instruction precondition 3](#) and also fails to meet the [Domain 7 literacy teaching standards](#) required as a result of [Senate Bill 488](#). The documentation submitted also refers to outdated precondition requirement language and does not meet the criteria defined in the evidence guidance aligned with current requirements.

We also believe that the Commission on Teacher Credentialing (CTC) has failed to ensure that the MC:NU's preliminary Multiple Subject program aligns with [CA EDC Section 44259\(b\)\(4\)](#) inclusive of subparagraphs (A) and (B) and [CA EDC Section 44259.5\(a\)](#) in that it is allowing instructional practices in the program's coursework that are not "evidenced-based",

supported by research, or reflective of [guidance](#) in the English Language Arts/English Language Development Framework.

The scope of our compliance complaint is as follows:

**Literacy Domain 7 Teaching Standards & Literacy Instruction Precondition 3:**

Both the Literacy Domain 7 Teaching Standards and the Literacy Instruction Precondition 3 require documentation that the educator preparation program's reading instruction is supported by research and is evidence-based. Yet several areas in the syllabi cited above refer to: **"guided reading"** with additional references to **"leveled texts"**, **"running records"**, **"three-cueing"**, and **"balanced literacy"** practices and tools typically aligned to a disproven theory of how reading acquisition develops and other practices that are not research-based.

In addition, there does not appear to be sufficient emphasis on evidence-based foundational reading skills as required in [Literacy Teaching Standard 7a](#), [literacy instruction precondition 3](#), or California Education Code Section [44259\(b\)\(4\)\(A\) and \(B\)](#).

It should be noted that one of the prominent required text readings cited in the course syllabi is Fountas, I., & Pinnell, G.S. (2006). Teaching for comprehending and fluency: Thinking, talking, and writing about reading, K-8. Portsmouth, NH: Heinemann.

According to the National Center on Teacher Quality, [Reviews of Reading Instructional Materials Used by Teacher Preparation Programs](#), this text, found in the course syllabi, is rated as **"Unacceptable"** with the following comment:

*"While there are many components of good reading strategies in this text, the theoretical framework is balanced literacy. This approach uses the three cueing system. Allowing students to guess at words based on visual, semantic, and syntactical clues is unacceptable. Students must be taught*

*through explicit, direct, instruction how to efficiently decode words. The text does provide adequate information on engagement with texts for meaning and application of reading strategies to use within the text, thinking beyond the text, and thinking about the text. The guided reading, leveling system of reading is questionable. Because the science of reading does not match with the philosophy of Fountas and Pinnell (2006), this text is not recommended for preservice teachers or reading professionals.*

Also, cited as required reading in the course syllabi is Fountas, I.C., & Pinnell G.S. (2017). Guided Reading: Responsive Teaching Across the Grades. Portsmouth, NH: Heinemann.

According to the National Center on Teacher Quality, [Reviews of Reading Instructional Materials Used by Teacher Preparation Programs](#), this text, found in the course syllabi, is rated as “**Unacceptable**” with the following comment:

*“Despite revisions and updates to this second edition of Guided Reading: Responsive Teaching Across the Grades (2017), there is still considerable misinformation on research-based practices for analyzing and responding to observations on students' reading performance. The authors of this text encourage the use of MSV (meaning, structure, and visual information) coding to categorize decoding errors in oral reading. Extensive research points to the effectiveness of data analysis and systematic instruction for all readers, and argues the critical importance of this approach for at-risk readers. While the authors acknowledge phonemic awareness as a variable of reading development, they state that "very little phonemic awareness training is needed," (p. 398). Similarly, information on effective phonics instruction is concerning. While the authors recognize that phonics instruction may be beneficial for some students, the guidance provided in this text does not align to the research on explicit instruction. Rather the authors guide readers to use in-the-moment incidental instruction. When*

*students have difficulty making sense of the relationships of graphemes and morphemes to accurately decode unknown words, explicit instruction is essential. Since the leveled readers are the source of instructional material, and are not pattern-based or decodable, the strategic and direct approach to phonics instruction that struggling readers need is not provided for within this framework. Not only does this text lack specific guidance for teachers on how to provide this instruction effectively, the authors encourage teachers to celebrate when students rely on other strategies to decode. The authors provide a scenario to illustrate the support of strategies that bypass using the print form of the word to decode, "this is an emerging behavior and certainly a cause for celebration - he used meaning (picture)," (p. 409). The instructional recommendations provided in this text are concerning given their misalignment to current research on effective instruction."*

Also cited in required course syllabi reading is Scholastic, How to Take Running Records, which is also based on debunked three-cueing practices and text leveling. [See Attachment A for Alphakids Assessment "How to Take Running Records" example by Scholastic.]

The California Department of Education "[Resource for Implementing the ELA/ELD Framework: Resource Guide to the Foundational Skills of the California Common Core State Standards for English Language Arts and Literacy in History/Social Studies, Science, and Technical Subjects](#)" (pages 11 and 14) states:

*"It is crucial that students are taught to monitor their understanding as they decode words in connected text. All students need to know that text should make sense and convey meaning. Contextual analysis can be used to verify the accuracy and fit of the word in the sentence or larger discourse. Contextual analysis, however, should not be relied upon to identify the word."*



The instructional practices encouraged in the program's course syllabi encourage and actually reinforce bad habits that are used by poor readers as further stated in the CDE Resource Guide:

"In their haste, students may guess at words, use only partial alphabetic decoding, or draw exclusively on other cues, such as context or images. Doing so regularly results in less practice with the full alphabetic decoding that is necessary for building the accuracy and automaticity with word identification that will serve readers well at present and over time."

It is disturbing that the COA Agenda Item 7 (referenced above) states "it bears noting that the proposed Preliminary Multiple Subject ....program under consideration in this item have demonstrated alignment to the new literacy standard." (page 1) when, in fact, the course syllabi appear to be based primarily on debunked balanced literacy practices with very little evidence-based practices included.

As stated in the Accreditation Handbook, "the precondition reviews in years one and four, however, are not the only times in which an institution may be found to be out of compliance. If it comes to light in any manner and at any point during the 7-year cycle that an institution is out of compliance with a precondition, action may be taken by the COA against the institution." (Source: [Accreditation Handbook](#), Chapter 4, page 3)

We are gravely concerned that the Commission on Accreditation has approved this program and we are formally filing a compliance complaint and request that COA take appropriate and immediate action. The use of these debunked methods is an incursion on the civil rights of the K-12 students who will be taught using the methods promoted at the MC:NU Oakland campus. Accordingly, we are informing the Oakland Branch's and California State NAACP's education teams in order to monitor this situation.

For future accreditation review, we recommend that the COA and its BIR reviewers consider using the educator preparation program resources



including model syllabi and course refinement tools accessible at [The Reading League Compass website](#).

Respectfully submitted,

Lori DePole & Megan Potente  
Co-State Directors  
Decoding Dyslexia CA

Todd Collins  
Founder  
California Reading Coalition

Yolie Flores  
CEO/Founder  
Families in Schools

Cc: Commission on Teacher Credentialing  
Mary Sandy, Executive Director  
Dr Lawansa Wesley, State NAACP Education Committee Chair  
Kareem Weaver, Oakland NAACP Education Committee Chair

Enc:

**Attachment A:**

Copies of MC: NU Syllabi for Courses EDUT 6106,  
6107,6108

Scholastic “How to Take a Running Record” example

**Attachment B:**

CA Education Code Sections 44259(b)(4)(A) and (B)

“Content Contrary to Research-Based Practices”  
Ellis, C., Holston, S., Drake, G., Putman, H., Swisher, A.,  
& Peske, H. (2023). Teacher Prep Review: Strengthening  
Elementary Reading Instruction. Washington, DC:  
National Council on Teacher Quality, pp. 10, 68-73.  
(Endnotes to Appendix C with supporting research cited)

Attachment C:

“10 Maxims: The Research Support - What We've  
Learned So Far About How Children Learn to Read” by  
Dr. G. Reid Lyon (Peer-reviewed research attached)

## Appendix B

March 29, 2024

Committee on Accreditation

1900 Capitol Avenue Sacramento, CA 95811

### **Subject: Response to Allegations Raised in Decoding Dyslexia Complaint**

Dear Committee on Accreditation,

We appreciate the opportunity to address the concerns outlined in the complaint from Decoding Dyslexia regarding the syllabus of MCNU Educators for Liberation, Justice, and Joy (ELJJ)'s preliminary Multiple Subject program. The complaint alleges that the program fails to comply with the literacy instruction precondition 3 and Domain 7 literacy instruction standard.

The complaint from Decoding Dyslexia alleges that the syllabus inadequately addresses the Teacher Performance Expectations (TPEs) laid out by the California Commission on Teaching Credentialing (CCTC) and further alleges that references to specific readings and practices included in the course outline should be viewed as "unacceptable," based on a statement from the National Council on Teacher Quality. This response takes up both of those assertions in turn.

First, it is clear and apparent that the [set of courses comprising the degree program](#) addresses all of the foundational skills and other elements of the TPEs, as the mapping linked to the syllabus shows ([Multiliteracies 1](#), [Multiliteracies 2](#), [Multiliteracies 3](#)). These include alphabetics, phonological awareness, phonics, spelling, and word recognition (including phonetic and morphemic approaches), as well as fluency and comprehension, along with discussion of how to engage in systematic, explicit instruction.

Second, while the complaint alleges that specific practices included in the program are not evidence-based, it is incorrect in that assertion. The complaint cites a paper from the National Council on Teacher Quality (NCTQ), an advocacy group, not an academic body, listing a set of "unacceptable" practices that it claims to have culled from research. These practices include any use of the Fountas and Pinnell text, the use of guided reading, running records, or miscue analyses, and any reference to "balanced literacy."

However, NCTQ misrepresents the research included in the references it cites and from the broader body of evidence in the field. In fact, many of the articles cited in the NCTQ paper provide substantial evidence for the practices the paper claims lack evidence, including miscue analysis and running records. Examples can be found in Stouffer's<sup>1</sup> review of running records

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<sup>1</sup> Stouffer, J. (2021). Seeking middle ground: Analyzing running records from the top and bottom. *The Reading Teacher*, 74(6), 769-784.

and miscue analyses; Rodgers and coauthors,<sup>2</sup> who describe the benefits of running records and conclude that “as an assessment tool, Running Records can provide a reliable written record of a student’s oral reading that teachers can use to inform instruction” (p. 692), offering evidence for training scorers for greater accuracy. Further, Castles and colleagues<sup>3</sup> stress the importance of balanced literacy approaches.

Further, the NCTQ paper references also include an experimental study comparing guided reading and explicit intervention for struggling students to traditional classroom instruction (Denton, et al.).<sup>4</sup> The study found that “outcomes for the intervention groups (guided reading and explicit intervention) did not differ significantly from each other” (p. 268). Explicit instruction provided larger advantages in comparison to traditional classroom instruction for certain decoding skills for struggling readers and was recommended for Tier 2 interventions. Some other studies have found that explicit instruction along with guided reading produces the strongest outcomes,<sup>5</sup> and indeed Fountas and Pinnell (1996) stated that guided reading should be one part of a primary-grade balanced reading program that also includes explicit lessons designed to teach how letters and sounds work. The two sets of practices are cumulative, not at odds.

Our planned coursework does just that: instructing teachers about how to offer explicit, systematic instruction in the foundational reading skills and using strategies like guided reading, running records, and miscue analyses as useful adjuncts to that instruction. We prepare teachers to collect rich information about how students are reading, which can inform future explicit instruction, and to help readers develop other skills leading to fluency and comprehension.

**Guided reading:** There are many aspects of the process of learning to read, and different strategies will be useful for different purposes and for different populations of students at different moments in time. The goal of guided reading is, together with explicit instruction in decoding, to help students learn how to approach texts so that they can read with understanding, with increasing independence over time. The teacher scaffolds the language structures or features of a text, promoting several kinds of comprehension (literal, inferential,

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<sup>2</sup> Rodgers, E., D’Agostino, J. V., Berenbon, R., Johnson, T., & Winkler, C. (2023). Scoring Running Records: Complexities and affordances. *Journal of Early Childhood Literacy*, 23(4), 665-694.

<sup>3</sup> Castles, A., Rastle, K., & Nation, K. (2018). Ending the reading wars: Reading acquisition from novice to expert. *Psychological science in the public interest*, 19(1), 5-51.

<sup>4</sup> Denton, C. A., Fletcher, J. M., Taylor, W. P., Barth, A. E., & Vaughn, S. (2014). An experimental evaluation of guided reading and explicit interventions for primary-grade students at-risk for reading difficulties. *Journal of Research on Educational Effectiveness*, 7(3), 268-293.

<sup>5</sup> See for example, Kamps D, Abbott M, Greenwood C, Arreaga-Mayer C, Wills H, Longstaff J, Walton C. Use of evidence-based small-group reading instruction for English language learners in elementary grades: Secondary-tier intervention. *Learning Disability Quarterly*. 2007;30:153–168.

and evaluative), simultaneously developing fluency. While teachers may attend to student decoding while teaching the lesson (noting, for example, the kinds of things that are problematic that may inform future direct instruction) and may even focus on a decoding strategy that will be useful when reading, explicit work on decoding takes place primarily in a different part of the reading lesson. Ford and Opitz (2011)<sup>6</sup> noted that guided reading is a practice that promotes opportunities for ongoing independent learning. When readers are guided to talk, think, and read their way through a text, they build up a “self-extending system,” so that every time reading occurs, more learning about reading ensues.

Several studies found positive effects of guided reading on various aspects of reading achievement.<sup>7</sup> There are others that found positive effects of guided reading as part of Leveled Literacy Intervention, a small group intervention for struggling readers that also provides explicit instruction in phonological awareness, phonics, fluency, vocabulary, reading comprehension, oral language skills, and writing. Using leveled texts, LLI helps teachers match students with texts of progressing difficulty and deliver systematic lessons targeted to a student’s reading ability. LLI has been identified as meeting What Works Clearinghouse standards as an effective intervention.<sup>8</sup>

**Running Records and Miscue Analyses:** The report of the National Reading Panel identified the appropriateness of using running records or miscue analyses for assessment of fluency:

A number of informal procedures can be used in the classroom to assess fluency. Informal reading inventories (Johnson, Kress, & Pikulski, 1987), miscue analysis (Goodman & Burke, 1972), pausing indices (Pinnell et al., 1995), running records (Clay, 1972), and reading speed calculations (Hasbrouck & Tindal, 1992). All these assessment procedures require oral reading of text, and all can be used to provide an adequate index of fluency.<sup>9</sup>

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<sup>6</sup> Ford, M. P., & Opitz, M. F. (2011). Looking back to move forward with guided reading. *Reading Horizons: A Journal of Literacy and Language Arts*, 50(4), 3.

<sup>7</sup> See for example, Gaffner, J., Johnson, K., Torres-Elias, A., & Dryden, L. (2014). Guided reading in first- fourth grade: Theory to practice. *Texas Journal of Literacy Education*, 2(2), 117-126.<https://eric.ed.gov/?id=EJ1110820>; Nayak G, Sylva K. The effects of a guided reading intervention on reading comprehension: A study on young Chinese learners of English in Hong Kong. *The Language Learning Journal*. 2013;41:85–103. Tobin KG, Calhoon MB. A comparison of two reading programs on the reading outcomes of first-grade students. *Journal of Direct Instruction*. 2009;9:35–46.

<sup>8</sup> [https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc\\_levelledliteracy\\_091917.pdf](https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc_levelledliteracy_091917.pdf)

<sup>9</sup> National Reading Panel Report, p. 3-9.

The Panel also reported positive findings of Reading Recovery training (pp. 2-39), which uses running records and miscue analyses.<sup>10</sup>

These positive outcomes are highlighted in a recent publication summarizing the evidence for the science of reading, *How the science of reading informs 21<sup>st</sup> century education*,<sup>11</sup> which reviews evidence on the science of reading by a team of researchers at the Florida Center for Reading Research (the academic home of the science of reading), an article also cited in the NCTQ paper. In the article, the research finding positive effects of Fountas and Pinnell's Leveled Literacy Intervention and Reading Recovery – both of which use running records and miscue analyses as well as leveled texts, in conjunction with phonics and decoding instruction -- is acknowledged as among the only evidence on widely used programs that has met the standards of the What Works Clearinghouse of the Institute of Education Sciences.<sup>12</sup> The large positive effects for both programs are also noted in the American Institute of Research Intensive Interventions Clearinghouse.<sup>13</sup>

Our program teaches teachers and future educators how to use decodable texts, as advocated for in the NCTQ letter. Yet, we note that the *Science of Reading* article noted above bemoans the lack of evidence for such texts, stating that it is one of the common instructional approaches that lack generalizable empirical support. While the use of decodable texts may rest on sound theoretical and pedagogical grounds, “the only study to experimentally examine the impact of reading more versus less decodable texts as part of an early intervention phonics program for at-risk first graders found no differences between the two groups on any of the posttest measures (Jenkins et al., 2004).<sup>14</sup> Such a result does not rule out the possibility of the usefulness of decodable texts but rather it indicates the need to disentangle the active ingredients of effective interventions to specify what to use, when, how often, and for whom”

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<sup>10</sup> National Reading Panel Report, pp. 2-106; 2-119; 2-129-130.

<sup>11</sup> Petscher et al. (2020), *How the science of reading informs 21<sup>st</sup> century education*, p. 271.

<sup>12</sup> The evidence snapshots from the What Works Clearinghouse are here:

<https://ies.ed.gov/ncee/wwc/EvidenceSnapshot/420>; <https://ies.ed.gov/ncee/wwc/EvidenceSnapshot/679>.

<sup>13</sup> <https://charts.intensiveintervention.org/aintervention> citing Ransford-Kaldon, C. R., Flynt, E. S., Ross, C. L., Franceschini, L. A., Zoblotzky, T. A., Huang, Y. & Gallagher, B. (2010). *Implementation of Effective Intervention: An Empirical Study to Evaluate the Efficacy of Fountas and Pinnell's Leveled Literacy Intervention (LLI)*. Memphis, TN: The University of Memphis, Center for Research in Educational Policy; Center, Y., Wheldall, K., Freeman, L., Outhred, L. & McNaught, M. (1995). An Evaluation of Reading Recovery. *Reading Research Quarterly*, 30() 240-263; Iversen, S. & Tunmer, W. E. (1993). Phonological Processing Skills and the Reading Recovery Program. *Journal of Educational Psychology*, 85() 112-126; May, H., Sirinides, P., Gray, A., & Goldsworthy, H. (2016). *Reading Recovery: An evaluation of the four-year i3 scale-up*. Retrieved from: <http://www.cpre.org/reading-recovery-evaluation-four-year-i3-scale>; May, H., Sirinides, P., Goldsworthy, H., Armijo, M., Sam, C., Gillespie, J. N., & Tognatta, N. (2015). Year One Results From the Multisite Randomized Evaluation of the i3 Scale-Up of Reading Recovery. *American Educational Research Journal*, 52(547-581); Schwartz, R. M. (2005). Literacy Learning of At-Risk First Grade Students in the Reading Recovery Early Intervention.. *Journal of Educational Psychology*, 97(2) 257-267.

<sup>14</sup> Jenkins, J. R., Peyton, J. A., Sanders, E. A., & Vadasy, P. F. (2004). Effects of reading decodable texts in supplemental first-grade tutoring. *Scientific Studies of Reading*, 8(1), 53-85.

(p. 8).<sup>15</sup> This in fact is why multiple vantage points on the process of learning to decode, comprehend, and develop fluency with text is so important for beginning teachers.

Finally, we note that the use of running records also appears in guidance from the What Works Clearinghouse, which synthesizes the highest quality evidence for practice in the field. The What Works Clearinghouse guide on *Foundational Skills to Support Reading for Understanding in Kindergarten through 3<sup>rd</sup> Grade*<sup>16</sup> includes a study of the University of Florida Literacy Initiative, which confirmed a set of successful reading practices that use running records.<sup>17</sup> The What Works Clearinghouse *Intervention Reports* also include studies of other successful interventions for struggling students that have used running records as part of the intervention process.<sup>18</sup>

Because of their value in helping teachers see the way in which students are reading – including what aspects of phonetic decoding are problematic for them -- the Institute for Education Sciences has sponsored training for learning to use running records.<sup>19</sup>

**Balanced Literacy:** The complaint seems to equate the idea of balanced literacy as equivalent to the “three cueing system” that allows “students to guess at words based on visual, semantic, and syntactical clues.” To be clear, this is not what Mills College and many others understand to be the meaning of balanced literacy. As the assignment for a balanced literacy lesson plan indicates, the goal of balanced literacy is to integrate reading, writing, language arts, and literature instruction so that students utilize what they learn from foundational skills instruction in multiple ways and contexts. This is consistent with the California ELA/ELD curriculum framework, which marries a strong emphasis on foundational skills for reading with emphases on expression and meaning making.

The National Reading Panel also discussed what Mills College at Northeastern University and many others identify as a balanced literacy approach:

Finally, it is important to emphasize that systematic phonics instruction should be integrated with other reading instruction to create a balanced reading program.

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<sup>15</sup> Petscher, Y., Cabell, S. Q., Catts, H. W., Compton, D. L., Foorman, B. R., Hart, S. A., ... & Wagner, R. K. (2020). How the science of reading informs 21st-century education. *Reading research quarterly*, 55, S267-S282.

<sup>16</sup> Foorman, B., Beyer, N., Borradaile, K., Coyne, M., Denton, C. A., Dimino, J., . . . Wissel, S. (2016). *Foundational skills to support reading for understanding in kindergarten through 3rd grade*. (NCEE 2016-4008). Washington, DC: U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance. [https://ies.ed.gov/ncee/wwc/Docs/practiceGuide/wwc\\_foundationalreading\\_040717.pdf](https://ies.ed.gov/ncee/wwc/Docs/practiceGuide/wwc_foundationalreading_040717.pdf)

<sup>17</sup> Lane, H. B., Pullen, P. C., Hudson, R. F., & Konold, T. R. (2009). Identifying essential instructional components of literacy tutoring for struggling beginning readers. *Literacy Research and Instruction*, 48(4), 277–297.

<sup>18</sup> See, for example, Taylor, B. M., Frye, B. J., Short, R., & Shearer, B. (1991). *Early Intervention in Reading: Preventing reading failure among low-achieving first grade students*. Minneapolis: University of Minnesota, Center for Urban and Regional Affairs and Office of the Vice President of Academic Affairs; [https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc\\_eir\\_app\\_112508.pdf](https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc_eir_app_112508.pdf).

<sup>19</sup> See <https://ies.ed.gov/ncee/edlabs/regions/midwest/pdf/eventslides/running-records-training-2-508.pdf>



Phonics instruction is never a total reading program. In 1st grade, teachers can provide controlled vocabulary texts that allow students to practice decoding, and they can also read quality literature to students to build a sense of story and to develop vocabulary and comprehension. Phonics should not become the dominant component in a reading program, neither in the amount of time devoted to it nor in the significance attached. It is important to evaluate children's reading competence in many ways, not only by their phonics skills but also by their interest in books and their ability to understand information that is read to them. By emphasizing all of the processes that contribute to growth in reading, teachers will have the best chance of making every child a reader. (p. 2-97)

Through thorough assessment of the concerns raised by Decoding Dyslexia, and alignment with the California curriculum framework and its TPEs, Mills College strongly believes that our program is evidence-based, responsive, and will adequately prepare teachers and future educators to impact education in the state of California. Mills College at Northeastern commits to remaining in contact with the CCTC and providing educational programming that prepares educators to satisfy the CCTC's Teacher Performance Expectations.

Should you have any further questions for Mills College at Northeastern University, please do not hesitate to contact Tomás Galguera at [t.galguera@northeastern.edu](mailto:t.galguera@northeastern.edu).

Sincerely,

A handwritten signature in black ink, appearing to be "Mike Jackson", with a stylized, flowing script.

Mike Jackson, Vice Provost of Curriculum and Programs