

Advocates for Literacy

November 13, 2017

Ms. Jennifer Bell-Ellwanger
Director of the Policy and Program Studies Service
U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 6W231
Washington, DC 20202-4537

RE: Docket ID ED-2017-OS-0078
Comments on Secretary's Proposed Priorities and Related Definitions for Use in Discretionary Grant Programs

Dear Ms. Bell-Ellwanger:

On behalf of Advocates for Literacy and the 58 undersigned organizations, we write to respond to the notice published in the *Federal Register* (82 FR-47484) on October 12, 2017 concerning the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs. This input is based on expertise from the member organizations of the Advocates for Literacy coalition as well as lessons learned from the Striving Readers Comprehensive Literacy (SRCL) Program funded by the Department of Education since FY 2010.

Advocates for Literacy is a coalition of close to 60 organizations that supports improved literacy instruction through comprehensive, birth through grade twelve state-led literacy plans that target struggling and economically-disadvantaged students with low-performing English language arts assessment scores. The group supports increasing the federal commitment to comprehensive literacy instruction through increased federal resources and evidenced-based practice as defined within the *Every Student Succeeds Act* (ESSA).

First and foremost we would like to commend the Secretary for including "Promoting Literacy" as one of her proposed priorities for use in the Department of Education's discretionary grant programs. In fact, we believe that literacy is *the* "foundation for learning and is essential to students' ability to progress, pursue higher education, and succeed in the workplace." We are also encouraged to see acknowledgement that "families play a critical role in supporting children's literacy," as well as the Secretary's stated commitment to help our education systems "...utilize and build evidence of what works," while supporting efforts to develop innovative solutions to present education challenges for our most vulnerable students.

Lastly and most importantly, the Coalition is fully supportive of the Secretary's focus on "promoting literacy interventions supported by strong evidence, including supporting educators with the knowledge, skills and professional development" as defined in ESSA. We believe strong evidence-based supports to improve literacy instruction in both pre-service and in-service settings for teachers, school leaders, administrators and early learning professionals is critical to ensure literacy proficiency for all students.

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Despite the fundamental importance of reading and writing, only 36 percent of fourth-grade students, 34 percent of eighth-grade students, and 37 percent of twelfth-grade students performed at or above the proficient level in the 2015 reading assessment of the National Assessment of Educational Progress (NAEP)—the Nation’s Report Card.ⁱ This means more than 60 percent of fourth-, eighth-, and twelfth-grade students struggle with reading and therefore require targeted instructional support. In addition, many of the nation’s young people who graduate from high school do so without the advanced literacy skills needed to succeed in college and a career. For example, around 60 percent of employers request or require high school graduates to get additional education or training to make up for gaps in their ability to read and write effectively.ⁱⁱ

It is with this commitment to literacy in mind that we offer the following recommendations.

Specific Recommendations

The Advocates for Literacy Coalition recommends changing the introductory sentence of this priority to align with definition of “comprehensive literacy instruction” included in the Literacy Education for All, Results for a Nation (LEARN) Act within Title II Part B, Subpart 2 of *ESSA*. Moreover, the priorities, requirements, definitions, and selection criteria for the 2017 cohort of Striving Readers Comprehensive Literacy (SRCL) grantees were recently updated to align with those under the LEARN Act, including the definition of comprehensive literacy instruction.ⁱⁱⁱ The Department of Education recently awarded 11 new SRCL grants using this definition.^{iv} Therefore, we strongly believe this change will better support the Secretary’s goals of improving all students’ literacy skills, resulting in stronger academic achievement and preparation for employment, responsible citizenship and fulfilling lives.

Specifically, the amended sentence would read:

“Projects that are designed to *support comprehensive literacy instruction, as defined in Section 2221(b)(1) of the Elementary and Secondary Education Act, as amended*, by addressing one or more of the following priority areas:”

Proposed Priority 7(d)

The Coalition strongly agrees that “integrating literacy instruction into content-area teaching using practices supported by strong or moderate evidence” is critical. However, content-area teaching should not be exclusively targeted to the middle and high school grades. Rather it is critical to incorporate literacy instruction into all content areas beginning in the elementary grades and continuing in the middle and high school grades after establishing a strong early foundation. The amended sentence would read:

“Integrating literacy instruction into content-area teaching *beginning in the elementary grades and continuing in the middle and high school grades after establishing a strong early foundation* using practices supported by strong or moderate evidence (as defined in 34 CFT 77.1).”

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Proposed New Priority

In addition, we propose an additional priority area (f) be included within the overall Literacy priority focused on the need to promote stronger abilities to foster foundational early language and literacy skills and align language and literacy support and instruction in a continuum from early education through fifth grade (as defined in section 2201(a)(1) of the Elementary and Secondary Education Act, as amended). Writing and reading skills must be taught sequentially to reflect the growing complexity of literacy skills and knowledge needed to succeed at each level of learning and education.

The process of learning to read and write begins at the earliest stages of life when a child first hears sounds and begins building understanding. A child's very early experiences establish the foundation for future learning. Inequities in those experiences, deeply influenced by parental practices, level of education, and resources, as well as the quality of early care and learning experiences begin almost immediately and have a profound long-term impact. For example, many children living in high poverty come to school with vocabularies and language processing abilities significantly below those of middle class children. Specifically, by age two, young children in lower socioeconomic status (SES) families on average are 6 months behind children in higher SES families in language processing skills and have a more limited vocabulary. They may be less likely to have the "serve and return" interactions that foster early language and literacy skills. By age four, the average child in a professional family hears about 20 million more words than the average child in a working-class family, and about 35 million more words than children in families receiving TANF. In addition, children from families receiving TANF have less access to high quality child care and pre-schools staffed by teachers and paraprofessionals with the knowledge of how to support the development of early language and literacy skills.

Therefore we propose priority area (f) state:

"Promoting support at a State and local level for early care and learning programs, including parenting support programs, to build foundational early language and literacy skills, together with close coordination between such programs and elementary education programs that maintain a differentiation of interventions and practices for different age groups."

Proposed New Definition

The Advocates for Literacy Coalition strongly believes the Secretary's discretionary grant priority on literacy must be aligned with the LEARN program as authorized in Title II, Part B, Subpart 2 in ESSA. The LEARN program includes a definition of comprehensive literacy instruction (as defined in section 2221(B)(1) of the Elementary and Secondary Education Act, as amended) which should be included as a definition in the Secretary's final list of priorities.

Proposed Definition

Comprehensive Literacy Instruction

The term "comprehensive literacy instruction" means instruction that—

(A) includes developmentally appropriate, contextually explicit, and systematic instruction, and frequent practice, in reading and writing across content areas;

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- (B) includes age-appropriate, explicit, systematic, and intentional instruction in phonological awareness, phonic decoding, vocabulary, language structure, reading fluency, and reading comprehension;*
- (C) includes age-appropriate, explicit instruction in writing, including opportunities for children to write with clear purposes, with critical reasoning appropriate to the topic and purpose, and with specific instruction and feedback from instructional staff;*
- (D) makes available and uses diverse, high-quality print materials that reflect the reading and development levels, and interests, of children;*
- (E) uses differentiated instructional approaches, including individual and small group instruction and discussion;*
- (F) provides opportunities for children to use language with peers and adults in order to develop language skills, including developing vocabulary;*
- (G) includes frequent practice of reading and writing strategies;*
- (H) uses age-appropriate, valid, and reliable screening assessments, diagnostic assessments, formative assessment processes, and summative assessments to identify a child's learning needs, to inform instruction, and to monitor the child's progress and the effects of instruction;*
- (I) uses strategies to enhance children's motivation to read and write and children's engagement in self-directed learning;*
- (J) incorporates the principles of universal design for learning;*
- (K) depends on teachers' collaboration in planning, instruction, and assessing a child's progress and on continuous professional learning; and*
- (L) links literacy instruction to the challenging State academic standards, including the ability to navigate, understand, and write about, complex print and digital subject matter.*

Conclusion

Once again, on behalf of the members of the Advocates for Literacy Coalition, we appreciate this opportunity to provide comments and suggestions on the Secretary's Proposed Supplemental Priorities.

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1. Academic Language Therapy Association
2. ACT
3. Advocacy Institute
4. Alliance for Excellent Education
5. American Association of Colleges for Teacher Education
6. American Occupational Therapy Association
7. Association of American Publishers
8. Association on Higher Education and Disability
9. Association for Middle Level Education
10. Council for Exceptional Children
11. Education Northwest
12. Early Care and Education Consortium

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13. Easter Seals
14. Every Child Reading
15. First Five Year Fund
16. First Focus Campaign for Children
17. Grimes Reading Institute
18. Higher Education Consortium
19. HighScope Educational Research Foundation
20. Home Instruction for Parents of Preschool Youngsters (HIPPY)
21. Institute for Educational Leadership
22. International Dyslexia Association
23. International Literacy Association
24. Keys to Literacy
25. Learning Disabilities Association of America
26. Literacy How, Inc
27. National Adolescent Literacy Coalition
28. National Association for the Education of Young Children
29. National Association of Elementary School Principals
30. National Association of School Psychologists
31. National Association of Secondary School Principals
32. National Association of State Boards of Education
33. National Black Child Development Institute
34. National Center for Families Learning
35. National Center for Learning Disabilities
36. National Coalition for Literacy
37. National Council of Teachers of English
38. National Down Syndrome Congress
39. National Down Syndrome Society
40. National Forum to Accelerate Middle-Grades Reform
41. National Head Start Association
42. National Title I Association
43. National Urban Alliance for Effective Education
44. National Women's Law Center
45. National Writing Project
46. Nemours Children's Health System

47. Parent Child Home Program
48. Parents as Teachers
49. Reading Partners
50. Reading Recovery Council of North America
51. Scholastic Inc.
52. School Social Work Association of America
53. TASH
54. TESOL International Association
55. The Arc
56. United Way Worldwide
57. WestEd
58. ZERO TO THREE

ⁱ U.S. Department of Education, National Center for Education Statistics, NAEP, 2015 Reading Assessment, <https://nces.ed.gov/nationsreportcard/reading/> (accessed May 17, 2017).

ⁱⁱ Achieve, Inc., *Rising to the Challenge: Views on High School Graduates' Preparedness for College and Careers, Part Two: Employers and College Faculty* (Washington, DC: Achieve, April 2015), <https://www.achieve.org/files/AchieveSurveyIIPowerPoint.pdf> (accessed May 17, 2017).

ⁱⁱⁱ See https://www.gpo.gov/fdsys/pkg/FR-2017-05-16/pdf/2017-09897.pdf?utm_campaign=subscription%20mailing%20list&utm_source=federalregister.gov&utm_medium=email

^{iv} See <https://www2.ed.gov/programs/strivingreaders-literacy/awards.html>.