

April 25, 2024

To: House Education Committee

From: Chelsea Myers, Associate Executive Director, Vermont Superintendents Association

Re: An act relating to supporting Vermont's young readers through evidence-based literacy instruction (S.204)

Thank you for inviting testimony from the Vermont Superintendents Association on the important topic of reading instruction. Literacy is foundational to being a lifelong learner, and all Vermont leaders should treat it as such.

First, my name is Chelsea Myers. I am the Associate Executive Director of the Vermont Superintendents Association, and this testimony has been informed by and contributed to by feedback from several superintendents and a reading specialist. I also have Superintendent Meagan Roy of Washington Central School District, who was the former chair of the Census-Based Advisory Group charged with informing the implementation of Act 173 of 2018.

I would be remiss if I did not comment on the timing of this bill and other proposed legislation. As you are well aware, school districts are under tremendous pressure. This bill as written would add another cost driver to the education system by requiring lengthy training for all educators. We will comment more on that later.

In many ways, the frameworks for sound policy to improve literacy outcomes are already in place. Local comprehensive assessment systems as required by the Education Quality Standards include screeners and "multiple measures across all content areas, for various purposes, and data that should be used to inform instructional and programmatic decisions." (Vermont Agency of Education) Act 173 of 2018 and Multi-tiered Systems of Support guide first instruction and support for students who struggle. The Individuals with Disabilities Education Act is a federal law that guides identifying students with disabilities, affording a Free Appropriate Public Education, and includes parents/guardians throughout the process. Act 173 was designed to provide robust implementation and professional development support to the field. While the policy frameworks are there, as is with many initiatives, implementation is variable due to a number of contextual factors, including but not limited to educator turnover and shortages.

In short, this bill contains complex and confusing elements within the context of a robust policy framework already in place in Vermont law and regulation. We thus have some recommendations on how to support and reinforce existing legislation with S.204 that does not interfere with or confuse the field as they contend with the myriad of initiatives passed in the last decade.

If the House Committee on Education is to proceed with this bill, we recommend that it focus on five primary components present in S.204: early screening, updates to existing policy to better align with current practice, professional learning (both the current workforce and teacher preparation programs), maintaining the Advisory Council on Literacy, and expanding early childhood literacy resources. The rest of the provisions in the bill are overly prescriptive and/or redundant with existing policy.

### **Early Screening (Sections 2-4 of S.204)**

Research underscores the critical significance of early literacy screening and intervention in shaping children's educational trajectories. Studies consistently demonstrate that early identification of literacy challenges significantly improves outcomes.

Early screening, as proposed by this bill, has a twofold purpose of (1) identifying struggling students and (2) informing the system of the efficiency of their Tier 1 instruction.

Per the latter purpose, the District Management Group's report titled, "[Expanding and Strengthening Best-Practice Supports for Students Who Struggle](#)," which laid the foundation for Act 173 of 2018 said the following, "For districts with large numbers of students who are not meeting goals, it's not desirable or practical to serve all such students through small group or individual Tier 2 or special education interventions. Many of these students can and must be helped through improvements in primary universal (Tier 1) instruction. A core underpinning of the multi-tiered-system-of-support (MTSS) model is that extra interventions serve 10-15% of students. Across the state of Vermont, approximately 45% of students did not score proficient in ELA on the state assessment grades 3-5 for the 2015-2016 school year. Investing in the effectiveness of core reading instruction is critical for students in general education and students with disabilities, and can ultimately reduce the number of students in Tier 2 and special education reading interventions."

Investing in universal instruction is imperative for supporting improvement in reading achievement. Early assessment tools can and should inform systems on how to

improve Tier 1 instruction. What does investing in universal instruction look like? Ensuring that educators are equipped with the training and coaching support necessary to provide high-quality reading instruction to all students.

The [Education Quality Standards](#) (Rule Series 2000) state that each “supervisory union shall develop, and each school shall implement, a local comprehensive assessment system.” Guidance from the Agency of Education explains components of this comprehensive assessment and defines universal screening, “to identify or predict students who may be at risk for poor learning outcomes. Universal screening assessments are typically brief, conducted with all students at a grade level, and followed by additional testing or short-term progress monitoring to corroborate students’ risk status.”

Early Literacy Universal Screening Assessments	
<ul style="list-style-type: none"><li>• DO identify a student’s risk for poor reading outcomes</li><li>• DO help to quickly differentiate between students that need intervention or additional assessment and those that do not</li></ul>	<ul style="list-style-type: none"><li>• DO NOT diagnose dyslexia</li><li>• DO NOT identify a disability</li><li>• DO NOT act as a substitute for a formal evaluation as part of the eligibility process for special education</li></ul>
<a href="#">(International Dyslexia Association)</a>	

[Graphic from the Mass. Department of Elementary and Secondary Education]

If the legislature would like to codify universal screening requirements in state statute while aligning with existing frameworks and reinforcing the work that school districts are already undertaking, it should consider the simplicity of legislation from Massachusetts ([603 CMR 28.03\(1\)\(f\)](#)) and the thoroughness of the [accompanying guidance](#). If we were to adapt that provision to the Vermont state context, it might read something like:

“Early Literacy Screening. Effective [DATE], each *public and approved independent school* shall at least *once* per year assess each student's reading ability and progress in literacy skills, from kindergarten through at least third grade, using a valid, developmentally appropriate screening instrument approved by the Agency *in collaboration with the Council on Literacy Department*. ~~Consistent with section 2 of chapter 71B of the general laws and the Department's dyslexia and literacy guidelines,~~ if such screenings determine that a student is significantly below relevant benchmarks *as determined by the screener's guidelines* for age-typical development in specific literacy skills, the school shall determine which actions within the general education program will meet the student's needs, including differentiated or supplementary evidence-based reading instruction and ongoing monitoring of progress. Parents shall be notified about

screening results as outlined in the school district's Educational Support Systems procedures (16 V.S.A. § 2902(b)(6)).”

*Additional comments on Sections 2-4:*

- Language addressing additional diagnostic assessment is thoroughly covered by state and federal law.
- VSA is concerned about the validity of collecting such data in the aggregate since different screeners will be used. How will the data be used? Will this be in place of another data collection or another requirement placed on schools?

**Updates to Existing Policy to Align with Current Practice (Sec 5 & 6)**

We support the updates to the existing statute.

**Professional Learning - Current Workforce (Sec 7)**

Professional learning is a critical component of any comprehensive literacy improvement plan. In the Research Brief “Building Better PL: How to Strengthen Teacher Learning,” the authors point out six core components to effective teacher learning programs.

“For the how of instructional delivery, research suggests the following PL formats can be particularly effective at producing changes in instructional effectiveness: (1) built-in time for teacher-to-teacher collaboration around instructional improvement; (2) one-to-one coaching, where coaches work to observe and offer feedback on teachers’ practice; and (3) follow-up meetings to address teachers’ questions and finetune implementation. For the what, there is growing evidence that PL may be more productive when it focuses on (1) building subject-specific instructional practices rather than building content knowledge alone; (2) supporting teachers’ instruction with concrete instructional materials like curricula or formative assessment items rather than focusing only on general principles, and; (3) explicitly attending to teachers’ relationships with students.”

School districts themselves are best equipped to provide this professional learning by addressing district-wide identified needs and aligning with best practices in effective teacher-learning programs. The current language in the bill does not afford flexibility for differentiation. The language places a significant burden on the Agency of Education to approve programs for all teachers in the state of Vermont. If the dosage requirement is based on the modules developed under Act 28 (~45 hours), this would be a significant cost for school districts.

If the bill is to include professional learning provisions, it must align with collective bargaining agreements, not be another added financial burden on school districts, and account for varying degrees of experience and need across the education system.

The Committee might consider, “Each school district and approved independent school shall provide professional learning to Kindergarten through Grade 3 educators on implementing a screening assessment, interpreting the results, and determining instructional practices for students, and communicating with families about the results in a supportive way on or before [effective date of screening implementation]. The instructional practices must be evidence-based and effective and shall address the foundational concepts of literacy proficiency, including phonemic awareness, phonics, fluency, vocabulary, and comprehension.”

This language would strike a balance between requiring evidence-based professional learning, aligning with the early screening provisions of the bill, and allowing flexibility for the school district or independent school to determine how that learning is best aligned with their system’s professional learning.

### **Professional Learning - Teacher Preparation Programs (Sec 8)**

Educator preparation programs are an important lever in comprehensive literacy policy. We support this provision of the bill.

### **Advisory Council on Literacy (Sec 9)**

We support this provision of the bill.

### **Expanding Early Childhood Literacy Resources (Sec 13)**

We support the work of the Department of Libraries in finding more ways to support early readers.

In addition, early language and other literacy skill development are crucial to later literacy achievement. “Learning to read and write starts long before first grade and has long-lasting effects. Learning to read and write is an ongoing process from infancy. Contrary to popular belief, it does not suddenly begin in kindergarten or first grade. From the earliest years, everything that adults do to support children’s language and literacy is critical.” (NIEER) For this reason, comprehensive literacy policy should focus on these earlier years.

For example, policy considerations could include:

- Looking at early learning standards related to language and literacy across the PreK delivery system. Are they consistent with research in early language and literacy development? Are they consistently applied across settings?
- Include required developmental screening for all publicly funded PreK programs as is required in S.204 for K-3 students.
- Providing training and support for early childhood educators in evidence-based early language and literacy skill development and screening.
- Considering elements of programs like [Providence Talks](#) that aim to close the 'word gap.'

As we conclude, equity must be at the forefront of this work. Data indicate that students from low socioeconomic backgrounds, BIPOC students, English language learners, and students with disabilities are disproportionately not getting what they need from the system to succeed in learning to read and write at the benchmarks set for all students. Equitable access to high-quality instruction must be a top priority in supporting this work. This is particularly challenging given the workforce shortage of highly skilled professionals in some regions of the state.

VSA actively participated in the Ethnic and Social Equity Standards Advisory Working Group for its duration. Reading instruction is interwoven into the principles of creating culturally responsive and inclusive environments for all students. The availability and use of texts that are culturally relevant and representative of historically underrepresented voices is critical to ensure that all students can connect their experiences to the text they are reading.

For these reasons, we ask that the General Assembly consider ways in which legislation can support the successful implementation of the revision of the Education Quality Standards. Additionally, any data collection and subsequent support for literacy instruction should identify and address equity gaps while respecting student privacy.

Thank you for your time and consideration of this important topic.