



January 10, 2024

To: Senate Education Committee

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

Re: An act relating to reading assessment and intervention (S.204)

Thank you for inviting testimony from the Vermont Superintendents Association on the important topic of reading instruction and outcomes. Quite frankly, literacy is a human right and 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 reviewed and contributed to by several superintendents and a reading specialist. Early in my career, I had the privilege of serving as the Lab Manager of the Laboratory for Education Neuroscience at the University of California, San Francisco where I conducted neuroscience research on early literacy development, publishing in peer-reviewed journals and book chapters.

The testimony I aim to provide to you today will (1) speak to literacy policy and reform overall and (2) speak directly to the proposed legislation.

Equity and Culturally Responsive Pedagogy

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. Though often unintentional, implicit biases can

impact the expectations for students. Expectations for students impact the way that educators interact with students and ultimately are correlated with student achievement.

For these reasons, we ask that the Senate Education Committee consider ways in which the legislation can support the successful implementation of the anticipated revision of the Education Quality Standards.

Early Learning

“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, 2006](#))

Early language and other literacy skill development is of utmost importance to later literacy achievement. 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 literacy across the PreK delivery system. Are they consistent with research in early language and literacy development? Are they consistently applied?
- 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.’

Teacher Preparation

The report Early Literacy in Vermont: Findings From the Vermont Educator Preparation Program Course Syllabi Review commissioned in Act 28 found that 60% of educators recommended for certification in early childhood, early childhood special education, and elementary pathways are served by the six educator prep programs studied by the researchers. Thus, focusing on educator preparation programs in Vermont could be an influential policy lever.

Generally, the survey in the report found that the six educator prep programs covered the six key reading components. However, reports from the field suggest that many

educators are not confident in their ability to teach reading, and education administrators anecdotally report a decrease in the readiness of early career educators as they leave higher education institutions. This might be related to the pedagogical “intensity” findings found in the report.

Please consider further investigating preservice programs in Vermont as a policy lever. [This report](#) from the Education Commission of the States outlines policies that other states have employed in this arena.

Early Screening, Intervention, and Act 173

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 purpose of S.204 significantly overlaps with the principles that were foundational to Act 173 of 2018. A law that was grounded in two robust studies and laid out an implementation plan and technical support from the field. Despite a well-crafted piece of legislation, there have been significant challenges with state-level support for implementation, seen in both the professional learning requirements for the Agency of Education and the rulemaking process, which did not live up to the expectations of flexibility for the field. This is to say, that Act 173 is an excellent and comprehensive systems approach for serving students who struggle and a valuable policy lever. VSA asks that you consider doing a deeper dive into the history and present of Act 173, monitor whether state stakeholders have fulfilled their responsibilities under the law, and reinvest in successfully implementing the best practices that laid the groundwork for that legislation.

Specific to S.204

Thank you to the sponsors of this specific bill and the Senate Education Committee for their commitment to ensuring that we improve reading outcomes for students in Vermont.

The following is specific feedback related to the proposed legislation:

- Please take testimony from school district administrators and the Agency of Education about how this bill fits within the context of the larger education delivery system, including but not limited to local comprehensive assessment systems, MTSS, Act 173, and IDEA. Any new initiatives should align within the context of these existing structures.
- The requirements laid out in S.204 require significant training and expertise at a time when school districts are contending with notable workforce shortages. That is to say, increasing the information that we have about students by means of early screening is important; however, screeners are only as good as the knowledge, expertise, training, and experience of those administering the screeners, interpreting the results, and providing instruction and interventions.
- Published list of approved screeners from the Agency of Education (page 2, line 11) - The superintendents that informed this testimony agreed that having a list of universal screeners at no cost to school districts could be helpful. They expressed concern about the limited expertise at the Agency of Education, which expanded under Act 28, but might not be sufficient to lead significant reading reform. Please consider adjusting the language to the following: “The Agency of Education shall identify and publish a list of approved universal reading

screeners in consultation with no fewer than three school district-based reading specialists...

- The universal screeners and screeners for dyslexia characteristics (page 2) - The current language switching between “universal screeners” and “screeners for dyslexia characteristics” is difficult to follow and distinguish. Screening is a critical component of an effective MTSS. And a solid comprehensive assessment system as part of an MTSS can and must adequately screen for literacy skills. However, universal screening, as defined by the International Dyslexia Association, is used “to determine a student’s risk for reading difficulty and the need for intervention.” This is inclusive of, but not exclusive to, dyslexia. Please consider revising the language in S.204 to say, “at risk for experiencing reading difficulties” or “at risk for experiencing reading difficulties, including risk of dyslexia.”
 - Page 4, Line 5 - A dyslexia screener will be administered when “students show deficits in reading and spelling words despite receiving evidence-based instruction.” How are *deficits* defined in the context of a dyslexia screener? How will a dyslexia screener fit within the context of diagnostic evaluation and the rights of students under IDEA?
- The characteristics outlined on pages 2 & 3 of S.204 should be properly vetted by school district-based reading specialists and informed by evidence. This is outside the scope of the testimony I can provide today.
- Page 3, Line 10 - Please consider revising this wording to, “...inform the instructional strategies for students in need of additional support.”
- Page 4, Line 13 - What does ‘more regularly’ mean in this context?
- Individual reading plan - VSA recommends that the Committee learn more from administrators and educators about how an individual reading plan fits within the context of personalized learning plans and IEPs.
- Page 4, Line 10 - At this time, VSA recommends focusing on what it must include rather than what it may not include.
- Page 16, Line 16 - Please consider changing “school board” to “school district”.
- Page 7, Line 4 - How is ‘deficiency’ defined?
- Vermont educator preparation programs’ implementation of reading instructional programs (page 7, line 13) - As specified earlier in the testimony, educator preparation as a policy lever is of interest to VSA. How would this be monitored and assessed?
- “A school reading specialist shall provide (Page 8, Line 9)” - While VSA agrees with the intent of this provision, not every school has a reading specialist (as defined by someone holding a reading specialist certification). Perhaps the Committee could consider expanding the definition to include other professional credentials. At its essence, this gets at the recommendation found in the DMG

report, [Expanding and Strengthening Best-Practice Supports for Students Who Struggle](#), for students who struggle to receive instruction from highly skilled educators.

The [Early Literacy Screening Guidance](#) from the Massachusetts Department of Elementary and Secondary Education (DESE) is a comprehensive tool that addresses many of the points that surfaced in this testimony and could be a useful resource when considering the revisions offered today. The guidance is in support of Massachusetts regulation 603 CMR 28.03 (1)(f), which requires schools to screen student's reading ability from Kindergarten to third grade at least twice per school year, use DESE-approved screeners, determine appropriate actions, and notify parents within 30 school days.

A comprehensive approach to improving reading outcomes will work to ensure that quality instruction is happening across the state, that our teachers have the skills they need to teach reading, and that our intervention systems have the skills and resources needed to address those who struggle.

Thank you to the committee for examining this issue. VSA shares your concern about the state of reading in Vermont. There are a number of reading specialists, special educators, curriculum directors, and superintendents who would be great assets in informing how to address the state of reading in Vermont. I would be happy to connect you with these experts.

Thank you.

A short video for your consideration: [How Reading Policy Evolved in 2023, And What's Ahead](#)