



September 20, 2019

Dr. Tine Sloan, Commission Chair
The Commission on Teacher Credentialing
1900 Capitol Avenue
Sacramento, California 95811

RE: Item 5C – Discussion of Potential Addition of New Teaching Performance Expectations for the Development of Literacy and Assessment Considerations

Dear Chair Sloan and Commission Members:

On behalf of the EdVoice Board of Directors, I write to express serious concern regarding potential options being considered in the Commission's September 2019 agenda item 5C, pertaining to the Education Code statutory definition of research-based reading instruction and related modifications to the Teaching Performance Expectations (TPEs).

There is strong evidence to suggest in agenda item 5B that the majority of teacher preparation programs are not delivering instruction based on the scientific consensus about what works when teaching children how to read. As such, an objective filter to ensure all candidates entering the field in a role "essential to reading instruction" demonstrate competency in science-based reading instruction is still obviously necessary. Indeed, the Legislature has already determined research-based foundational skills are absolutely critical and demonstrated competency is an obligation the state has to California's students.

Unfortunately, options being considered appear to be proposing the dilution or elimination of the focus on foundational skills and science-based reading instruction. Education Code Section 44283 is clear, there is simply no statutory authority to delegate the responsibility of the development, adoption or administration of a reading instruction competence licensure assessments to teacher preparation programs through coursework or otherwise locally developed assessments. It is the statutory responsibility of the commission: "The *commission* shall develop, adopt, and administer..." [emphasis added]. Moreover, Section 44283(b) makes it clear that the administration of such an assessment is for those seeking a credential "essential to reading instruction." To be sure, the Legislature specifically and repeatedly used the term "reading" instruction and specifically did not use the term "literacy" instruction.

EdVoice urges the Commission to direct CTC staff to execute the appropriate oversight of the current Reading Instruction Competence Assessment (RICA) vendor. This should include a review of the current instrument and scoring rubric to ensure that the assessment is valid, reliable, free from bias and incorporates science-based reading instruction so that all California teacher candidates "essential to reading instruction" have demonstrated competency in the research-based expectations defined in statute (Cal. Educ. Code Section 44259 and Section 44283).

Furthermore, it is unclear that there is a willingness by the Legislature or the Administration to significantly expand the state operations of the CTC at a magnitude of staffing that would be required to ensure that over 100 programs are teaching candidates with fidelity science-based foundational skills in California, let alone audit schools of education across the nation.

California should be a leader in the settled science on teaching reading and must ensure all of its children needing to learn how to read are being taught by a teacher who knows how to teach reading with scientifically proven methods. Sixty-four percent of California low-income third graders cannot read on grade level. Rather than eliminating demonstrating competency of teaching the foundational skills in reading as a prerequisite to licensure, we believe the Commission should focus on the reliability and validity of the assessment instrument and better understand the wide range of passing rates of program completers in item 5B.

Please do not hesitate to contact me with any questions.

Respectfully,

A handwritten signature in cursive script that reads "Bill Lucia".

Bill Lucia
President
EdVoice

Cc: Mary Vixie Sandy, Executive Director, Commission on Teacher Credentialing
Anthony Williams, Legislative Affairs Secretary, Office of the Governor
Jennifer Johnson, Deputy Legislative Affairs Secretary, Office of the Governor
Jeff Bell, Program Budget Manager, Department of Finance
Lynn Lorber, Chief Consultant, Senate Education Committee
Roger Mackensen, Republican Policy Consultant, Senate Education Committee
Tanya Lieberman, Chief Consultant, Assembly Education Committee
Robert Becker, Republican Policy Consultant, Assembly Education Committee