



Maryland READS Comments on MSDE's Draft Literacy Policy

July 19, 2024

CONTENTS

- About Maryland READS
- Our Key Takeaways
- Maryland READS Seven Part Action Plan
- Description of Process
- Major Discussion Topics
- About Retention Policies
- READS Roundtable Attendee Makeup
- List of all Questions Posed Organized by Category
- Summary of Literacy Policy Shared with Attendees



ABOUT MARYLAND READS

Background on Maryland READS

Maryland READS is a non-profit organization that was founded to end the literacy crisis in Maryland. In 2021, a cross section of individuals came together, motivated by their deep concern with the ten-year decline in reading proficiency rates in Maryland that was largely being ignored. Our mission is to improve the effectiveness of reading instruction to meet the diverse academic, cultural, and linguistic needs of every student. We do this by using research, data, and evidence of best practices to drive conversations, inform decisions, and engage stakeholders and policymakers in implementing approaches designed for impact.

Our approach is changing the culture of how Marylanders think about reading by bringing together stakeholders in our communities who work both inside and outside of the classroom and providing them with a platform and support to build their capacity and impact. We focus on building systems of support through three proven paths to closing the literacy gap:

1. Improve reading instruction through the Science of Reading;
2. Build thriving reading ecosystems; and
3. Address barriers to reading proficiency.

Through collaboration and strategic partnerships, Maryland READS is building a powerful statewide network to provide state and community leaders and stakeholders with a place to engage, share best practices, advocate, and shape their action plans to ensure all children have the literacy skills necessary for success in school and beyond. We have high expectations because we know every child is capable of becoming a proficient reader and we feel the urgency to act because Maryland is 40th in the nation in reading proficiency, which is unacceptable.



OUR KEY TAKEAWAYS

MSDE's draft literacy policy is not a comprehensive literacy policy that addresses the needs of all students in our elementary and secondary education systems but rather a reading instruction plan for K - 3rd grade. A comprehensive literacy plan should focus on instructional strategies throughout elementary, middle, and high school; building thriving reading ecosystems that reinforce the instruction in the classroom; and addressing barriers to reading proficiency. Through our ongoing policy conversations with our growing network, we found that these semantics matter and below we offer our overarching takeaways to help inform the development of a true comprehensive literacy plan. In addition, we are including the seven part action plan from our inaugural report, [The State of Reading in Maryland 2024: The Silent Crisis of our Ten Year Decline](#).

Following these recommendations, we also include the summaries from the two virtual sessions we conducted with members of our network that represent a cross section of Maryland stakeholders.

- **Include a focus on middle and high school.** The current draft lacks a meaningful discussion of immediate action to support current students in middle and high school and instead focuses on kindergarten through grade three. We understand the rationale of investing in structural improvements to improve foundational reading instruction in the early grades. However, our state has failed an entire generation of students over the last decade. If we do not act swiftly to meet the needs of our existing middle and high school students, we will fail yet another generation of students. This will be even more important in January when the next round of NAEP scores are released that will include data on 10th grade reading proficiency rates. Furthermore, as a state with a large population of newcomers, we also need to recognize the needs of 4th and 5th grade students entering our school systems from outside of our state.
- **Retention:** Retention policies elicit strong reactions and, in the course of our conversations, we found that many individuals have varying understanding of existing research and hold many assumptions about the process and timetable for enacting these policies.
 - **Clarify Research:** MSDE should identify the research and evidence base that underlie the actions they will execute to implement a retention policy.
 - **Communicate Target Timeline:** In our conversations, there were assumptions being made about the timetable for implementing a retention policy. We assume that any retention policy will be launched only after MSDE has

successfully deployed the supports that were identified in their draft so that retention is truly a policy of last resort. Clarifying the intended timeline will help alleviate concerns and prevent erroneous assumptions.

- **Explore Alternative Approaches for Retention:** The rate at which children become proficient readers varies. Because a child struggles to learn to read does not mean that they can never master foundational reading skills. Instead, they may simply need a slower pace and more direct instruction. In our conversations, our network shared their concerns regarding the social impact to children who are retained in 3rd grade and other concerns with respect to stigma. It is our recommendation that MSDE explore alternative approaches to retention. For example, in a recent conversation with Tennessee stakeholders, they shared the possibility of retaining students in earlier grades in order to ensure students master foundational skills and that the negative impact of retention is lessened.
- **Focus on Transparency and Trust:** When the draft policy was released, MSDE did not provide a description of the process that was used to create the draft nor the process that would unfold to develop a final version for approval by the State Board. In fact, there were several news articles that created a perception that the policy being submitted to the State Board on July 23rd would be a final version with a request for approval. The lack of clear timelines allowed misinformation and distrust to take root. Further, the concerns we heard with respect to the retention policy were often rooted in a lack of faith that the support described in the plan would be adequate and timely. This lack of trust is a direct result of the erosion of our state systems over the last decade. While we appreciate and applaud the sense of urgency guiding MSDE's approach, taking time for authentic stakeholder engagement is an important step to building trust. People are more willing to support innovative and controversial policies when there is trust in leadership.

It is impressive that just ten months after Dr. Carey Wright was appointed Superintendent of the Maryland State Department of Education, her agency has crafted a comprehensive approach to improving reading instruction in Maryland schools. However, improving reading instruction is just one strategy to address our reading crisis. Success will not come from what happens in the classroom alone. Families with students who are furthest from meeting standards will look to their local ecosystems for support. We look forward to further conversations about how a comprehensive state literacy policy can connect to the ecosystem work unfolding in our local communities. A movement is building of energetic and motivated people who are willing to work together to improve reading outcomes for all students across our state of Maryland. We encourage you to leverage this movement.

The Maryland READS Seven-Part Action Plan



Shift Our Approach

Embrace the Science of Reading across our state. Prioritize teaching approaches and tactics that are rooted in Science of Reading research and evidence.²²



Improve Instruction

Improve core reading instruction, by giving our existing teachers consistent, comprehensive, and job-embedded professional learning opportunities coupled with high-quality research-based instructional materials.



Build Better Data and Progress Monitoring Systems

Improve how we collect, select, and analyze data and how we train educators to use it to monitor student progress so they can identify students who are struggling to read as early as possible and provide immediate, targeted, and effective support.



Intervene Early and Effectively for All Students

Provide interventions for struggling readers at all levels, from the early elementary years all the way through high school, because students of all ages are still acquiring and refining reading skills.



Develop Leadership Capacity

Train our principals and those who supervise them in the Science of Reading so they understand the research, how teachers are being asked to change their practices, and how they can create supportive environments that help teachers become more effective.



Create a Thriving Reading Ecosystem

Build a thriving reading ecosystem that includes a coherent state system of support, community resources that encourage and nourish research-based strategies for students, and education and advice for parents so they can also reinforce what districts are doing to help children become thriving readers



Invest in the Next Generation

Prepare the next generation of teachers and administrators. Align teacher preparation programs to the Science of Reading, ensure that all elements of Balanced Literacy and Whole Language Instruction are removed from the curriculum, inspire faculty to improve reading instruction curriculum, and hold their leaders accountable for progress.



DESCRIPTION OF PROCESS

Maryland READS Process for Developing Comments for the Draft Literacy Policy

Maryland READS undertook an inclusive approach to gather feedback in response to the Maryland State Department of Education's new draft literacy policy. Recognizing the importance of informed and comprehensive input in shaping effective policy, we structured our process to involve multiple stakeholders from our network.

For recruitment, we reached out to individuals within our established network, which includes educators, parents, reading specialists, librarians, legislators, community organization leaders and other stakeholders invested in literacy education. We encouraged our network to invite others they know who might have a stake in the policy and important feedback to share. We were grateful to convene two groups of participants, each bringing diverse experiences and insights to the table.

To facilitate meaningful dialogue, we organized two virtual conversations. These sessions were conducted in a facilitated format to maintain focus and productivity. Cary Cuiccio, our deputy director, led these discussions. Her facilitation skills ensured that the conversations were structured and encouraged open and honest feedback from all participants.

Our discussions centered around a series of guiding questions meant to gather detailed insights on the draft policy. These questions were created from our initial review of the policy and aimed to address important points. The questions included:

- What do you like most about the policy?
- What did you notice about the policy?
- What questions do you have about the policy contents?
- What do you think is missing from the policy?
- What else would you change about the policy?

By focusing on these questions, we were able to collect productive, focused and thoughtful feedback.

This process underscores our commitment to enhancing literacy education in Maryland and the value of a range of perspectives from the individuals who will be asked to implement the policy and those it is intended to benefit.

MAJOR DISCUSSION TOPICS

Maryland READS Roundtable Summary

(extended notes [here](#))

Session 1: July 9th, 2024

Positive remarks included: MSDE's 'seriousness', 'strong language', and providing definition for terminology likely unfamiliar to some.

Concerns expressed were:

- The time at which interventions would take place during the school day (so as not to interfere with crucial activities such as physical ed. and/or the arts),
- The reliability of ARTC (alternative route) teachers, who are frequently inexperienced and arguably unsuitable for the responsibility of teaching students how to read during their most formative years.
- The absence of language on addressing diversity, equity, and inclusion, since these retention 'roadblocks' are inevitably biased towards people of color.
- What is MSDE's definition of a reading deficiency and who specifically is in charge of determining what constitutes one or not?
- Why isn't there any information on older readers?

In general, attendees agreed that the literacy policy should be more specific in terms of how they plan to accomplish their goals, and a timeline for when they plan to do so (schools need sufficient time to train teachers, on-site coaches, etc. to prepare BEFORE being held accountable).

Session 2: July 11th, 2024

Attendees were impressed by MSDE's tone and signaling of a serious initiative, which was previously absent. In addition, parent involvement as being integral to the policy, was well received.

Common concerns included:

- A lack of explanation of details regarding funding, resource allocation, and timeline.
- Concern for retention being the crux, and specifically, how we need to be targeting children as young as in kindergarten, as opposed to 3rd grade. A principal communicated that, "no child really should leave kindergarten without having some level of ability to read."
- People noted there is nothing mentioned in the policy on students in high school or in secondary education; multiple attendees wanted to see more in the policy about older learners
- Another desire was for the policy to include information on interventions for multilingual older learners.

About Retention Policies

(extended research [here](#))

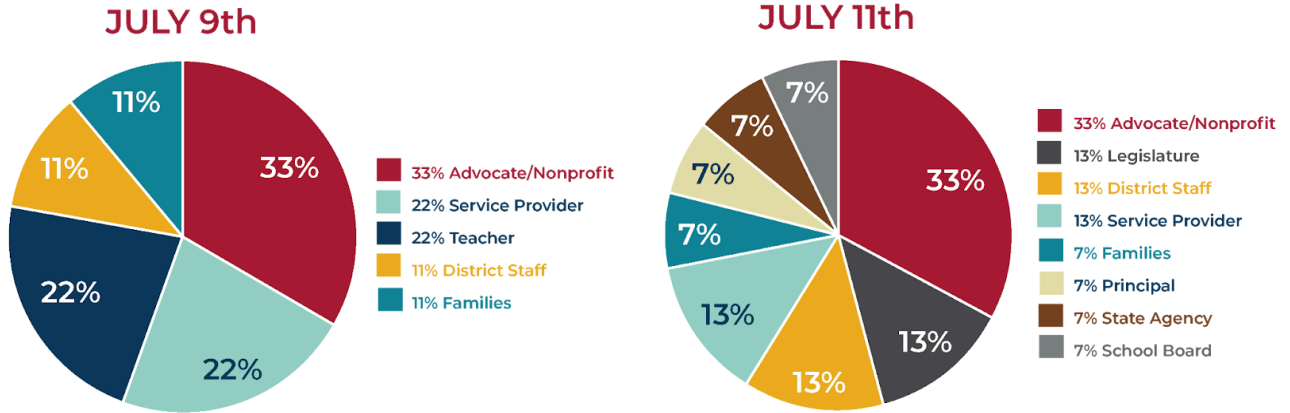
Informed by background and knowledge in retention and literacy policies, our feedback to the Maryland State Department of Education reflects an understanding of existing frameworks and their implications. This foundation allows us to provide nuanced and evidence-based responses that aim to enhance the efficacy of this new literacy policy in Maryland.

The case of [Mississippi's Literacy-Based Promotion Act](#), initially enacted in 2013, introduced mandatory K-3 screening, intensive interventions, and third-grade retention for students with low reading scores, with certain exemptions. The notable improvement in Mississippi's NAEP scores, with a ten-point increase in fourth-grade reading from 2013 to 2019, highlights the potential impact of rigorous literacy policies. Additionally, by sixth grade, students who repeated third grade scored in the 62nd percentile on average, compared to the 20th percentile for those who were promoted. Our feedback to MSDE draws on these [findings](#). We also consider existing policies in other states, coupled with multiple research studies when addressing the complexities and controversies surrounding third-grade reading retention. Critics highlight concerns regarding the expenses associated with retention, question the necessity of such measures, and raise issues of inequity based on socioeconomic status, race, and ethnicity.

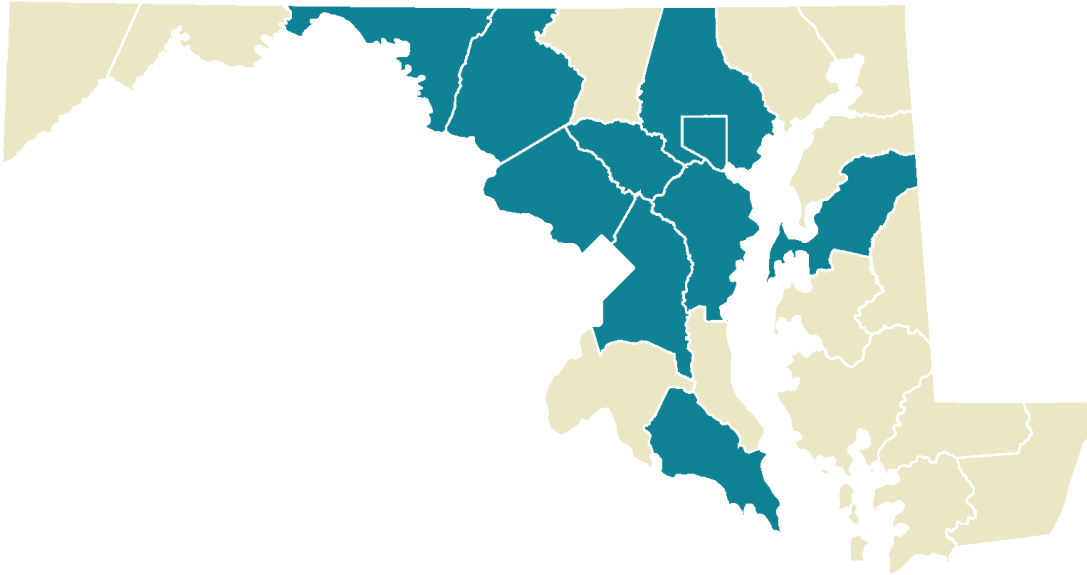
- **Costs of retention:** While retention is expensive, [research from Boston University](#) suggests that its costs may be overestimated when not accounting for delayed expenditures and less-than-full-year schooling. Florida's policy, for example, showed that elementary grade retention under test-based promotion conditions could be cost-effective, potentially increasing lifetime earnings for students.
- **Is retention necessary?** [Research](#) consistently shows that students who fall behind in reading by third grade struggle to catch up in later years. This underscores the importance of early interventions and continuous support, as well as third grade retention in order to best promote that student's success. However, we also recognize the potential downsides of retention, such as stigmatization and the reliance on a single standardized test. Hence, our feedback advocates for retention as a last resort, emphasizing the necessity of multiple criteria and early, robust interventions.
- **DEI:** Studies from [Florida](#) and [Michigan](#) illustrate these issues, showing that students of color are more likely to be retained. Our feedback emphasizes the need for equitable application of policies and comprehensive support measures to ensure retention, when necessary, is effective and fair

▶ READS ROUNDTABLE ATTENDEE MAKEUP

Roles of Attendees



Geographic Representation of Attendees





LIST OF ALL QUESTIONS POSED (ORGANIZED BY CATEGORY)

Definitions

- What constitutes a reading deficiency in MSDE's eyes?

Focus

- Where is the language on older learners/readers (secondary/higher education)?
- Where is the language on diversity, equity, and inclusion
 - ❖ How will the literacy policy close the achievement gap, specifically as it pertains to NOT just PERSONS OF COLOR (everyone bundled up into one), but specifically for African American Children in the state of Maryland (in MoCo specifically) [taken from comments in the chat]

Implementation and Execution

- When will schools be held accountable for the requirements of this policy?
 - ❖ Can MSDE preemptively share a detailed timeline with schools so that expectations are known and enough time is allotted for schools to prepare
- Is this going to be another mandate that is under funded?
 - ❖ How are funds & resources going to be allocated

Process and Timelines

- The policy was not developed with stakeholder input; will conversations following the 7/23 meeting include stakeholders?

Screenings and Interventions

- Where are the language screeners so that we can have a more comprehensive profile of our kids?
- What is the weight of our screeners, are we changing weight?
- When (during the school day) would intervention take place
 - ❖ Would it interfere with essential activities such as physical education and/or the arts?
- Are all districts using the same screening formatting? If not, their identification of reading-deficiency students is not the same
- What is the focus on improving interventions and a path to accreditation under CERI?
- For students with oral language difficulties & reading difficulties, what is the focus in shifting to the underlying etiology of deficits?

Supports

- Who is qualified to do coaching/teaching
 - ❖ What are the state-approved assessments for teacher candidates for science of reading instruction?
 - ❖ Are they nationally certified IDA-Endorsed?
 - ❖ Are they currently being recruited/hired/trained?
 - ❖ Are Alternate Route Teachers truly qualified to take on the responsibility of upholding the new literacy standards given that they may be simultaneously working towards their certification, and often lack experience in teaching, let alone in reading instruction?
- Are teachers responsible for adjusting curriculum and instruction in response to student performance on progress-monitoring-assessments?
 - ❖ Will such adjustments be made based on individual or whole-class performance
- Who will orchestrate intensive reading instruction, especially individualized content and instruction outside of regular school hours?
- Is there any guidance to districts for teachers who consistently fail students despite having undergone training?
- How can counties that aren't as 'solvent' as others be guaranteed additional support?
- How do we ensure thorough and accurate assessment of teacher prep programs, specifically their instruction of "the negative impacts of the three-cueing systems model, how to identify it in curriculum, and why it is a flawed model of teaching children to read" without them being penalized for simply referencing the topics in the syllabi?

Retention

- What are the implications of an initiative spearheaded by retention?
 - ❖ if the policy were to be enacted right *now*, 52% of 3rd graders would be retained (\$15,000 per kid for additional year of retention comes out to \$325,000,000 per year
- How do we ensure that retention years are effective?
 - ❖ Are kids getting the same instruction from the previous year?
 - ❖ What's going to be different in year 2?
- What happens if we consistently see the same demographic being held back in grade 3 across a district or school?
 - ❖ Where is the language on diversity, equity, & inclusion?
- Which assessments will be used to determine proficiency? What assessments will be used for retention?
- SPED students are not retained, therefore, will more students at risk of retention be referred to SPED?



Summary of Literacy Policy Share with READS Roundtable Attendees

(<https://marylandpublicschools.org/programs/Documents/ELA/draft-msde-literacy-policy-6-25-24.pdf>)

Purpose

- Moving from grade to grade should be determined, in part, by reading ability
- School board policies facilitate instruction/intervention services
- Each student and their respective guardian is informed about reading progress

Policy Standards

I. System of Support for Educators

- Support for K-3 Teachers
 - ❖ Provide general education, special education, and ESOL teachers with necessary knowledge and skills to teach reading effectively
- Assessments for school districts to use, including dyslexia screening & monitoring of low grade-level reading
 - ❖ Reliable screeners & dyslexia-specific screeners administered 3x per year
- Professional Learning
 - ❖ Mandatory training for administrators and teachers on the Science of Reading
 - ❖ Training on assessment administration and data analysis
- Job-embedded coaching for K-3rd grade teachers
 - ❖ On-site support for teachers, including instruction of teaching aligned to the Science of Reading, model lessons, co-teaching, and feedback
- Prep programs and assessment for not-yet teachers pursuing a career in teaching
 - ❖ Ensure candidates pass a state-approved assessment aligned to the Science of Reading for initial licensure

II. Reading Instruction and Intervention

- Each student should be able to read at or above 3rd grade level
- Use of HQMs grounded in the Science of Reading
- Reading Intervention Program
 - ❖ Supplement core reading instruction with regular progress monitoring
- Tier 1 instruction for K-3rd grade students with reading deficiencies

III. Student Reading Improvement Plan (SRIP)

- K-3 children exhibiting a reading deficiency should receive a specialized plan (created by teacher/principal/admin of school) within 30 days of deficiency identification
- Parents should be notified no later than 15 days after deficiency identification

- If child's reading level is not corrected by end of 3rd grade, they will not be allowed to go to 4th grade
- Incoming 3rd graders with an identified reading deficiency shall receive intensive instruction
- 3rd graders must demonstrate adequate reading ability as per the State Board of Education's determination
- Good Cause Exemptions
 - ❖ Specific cases involving students with disabilities
 - ❖ Students with less than 2 years of English Language Development instruction
- Parent/Guardian Notification of Retention
 - ❖ LEA's involvement in providing parent notification of retention, including intervention options
- Successful Progression of Retained Readers
- LEA will ensure that retained readers have access to intervention info

Responsibilities

- District Annual Reporting
 - ❖ Each District school board needs to annually report to the Department of Education by October 1st
- MSDE Specific Responsibilities
 - ❖ Establish formatting for annual reports, provide technical assistance, and vet teacher licensure assessments
- State Board Specific Responsibilities
 - ❖ Enforce Literacy Policy & ensure implementation across local education agencies