Item 3.A.1

Attachment A

ELA/ELD Subject Matter Committee

November 18–19, 2020

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# Public Comment Responses for the Draft Comprehensive State Literacy Plan

This attachment contains all public comments received between September 17, 2020, and October 28, 2020, through an online survey and through email for the first public review of California’s draft Comprehensive State Literacy Plan (SLP). Table 1 lists the input sources and comments are organized in the proceeding tables by section of the SLP, overall evaluation ratings, and additional comments. All comments are provided in their original form without editing.

Staff from the Educator Excellence and Equity Division (EEED) of the California Department of Education (CDE) analyzed each of the public comments and provided one of the following responses:

* Recommended: The CDE recommends that the SLP be revised to include the additions, edits, and/or changes stated in the public comment.
* Not Recommended: The CDE does not recommend that the SLP be revised include the additions, edits, and/or changes as stated in the public comment.
* Not Actionable: The public comment does not include actionable additions, edits, and/or changes that can be applied to the SLP, and no action is needed.

In determining whether an addition, edit, and/or change should be made, staff were guided by the purposes and goals of the Comprehensive Literacy State Development (CLSD) grant program and the draft SLP. One of the primary goals of the CLSD and SLP is to bring together and align existing state policy and guidance documents. The intent of the CLSD and SLP is not to create new policy and guidance.

## Table 1: Input Sources

| **Number** | **First Name** | **Last Name** | **Affiliation** | **Input Method** |
| --- | --- | --- | --- | --- |
| 1 | Shelley | Velasco | District Administrator | survey |
| 2 | Shannon | Hahne | Title 1 Elementary ELA-Literacy TOSA | email |
| 3 | Ruthie | Brazell | Parent | email |
| 4 | Jonathan | Hunt | County Office of Education Administrator | survey |
| 5 | Catlin | Foster | Credentialed K–12 Teacher | survey |
| 6 | Dr. Dianna J | Ballesteros | District Administrator | survey |
| 7 | Peggy | Stern | Parent/Guardian of K–12 Student | survey |
| 8 | Tim | McGlasson | Retired High School English and Public Speaking Teacher | survey |
| 9 | Debra | Schneider | District Administrator | survey |
| 10 | Jeff | Frost | California School Library Association | email |
| 11 | Anna | Lane | Teacher Librarian | survey |
| 12 | Janine | Riveire | College/University Faculty | survey |
| 13 | Brigeen | Houghton | Teacher Librarian | survey |
| 14 | Mark | Archon | County Office of Education Administrator | survey |
| 15 | Alison | McKeeman Rice | Curriculum Specialist | survey |
| 16 | Christi | Roscigno | District Administrator | survey |
| 17 | Christina | Nitsos | Credentialed K–12 Teacher | survey |
| 18 | Bill | Younglove | California Association of Teachers of English | email |
| 19 | Marian | Murphy-Shaw | County Office of Education Administrator | survey |
| 20 | Amanda | Turkie | Teacher Librarian | survey |
| 21 | Harriett | Janetos | Curriculum Specialist | survey |
| 22 | Kou | Vang | County Office Curriculum Specialist | email |
| 23 | Lori | DePole | Community Member | survey |
| 24 | Megan | Potente | Other (Decoding Dyslexia) | survey |
| 25 | Rachel | Hurd | Community Member | survey |
| 26 | William | Patterson | Community Member | survey |
| 27 | Alex | Potente | Parent/Guardian of K–12 Student | survey |
| 28 | Alida | Fisher | Parent/Guardian of K–12 Student | survey |
| 29 | Marian | Aste | College/University Faculty | survey |
| 30 | Sera | Hernandez | College/University Faculty | survey |
| 31 | Corina | Sapien | Other (SEAL - Sobrato Early Academic Language) | survey |
| 32 | Deberah | Schlagel | Parent/Guardian of K–12 Student | survey |
| 33 | Margaret | Peterson | College/University Faculty | survey |
| 34 | Lois | Luckey Treiber | Credentialed K–12 Teacher | survey |
| 35 | Robert | Mullenger | Parent/Guardian of K–12 Student | survey |
| 36 | Jim | Kelly | Other (Developer of the website www.k-12math.info a MERLOT 5 star rated Open Access educational resource, which has been honored twice (2018/2016) by the United Nations.) | survey |
| 37 | Connie | Williams | Other (Educational Consultant / NBCT Teacher Librarian) | survey |
| 38 | Amy | Linden | Teacher Librarian | survey |
| 39 | Berenice | Onofre | Other (Latino-PEMA Founder) | survey |
| 40 | Amy | Mejia | County Office of Education Administrator | survey |
| 41 | Shelly | Spiegel Coleman | Other (Californians Together, coalition of 25 parent, professional and civil rights organizations focused on improving policy and practice for ELs.) | survey |
| 42 | JoAnne | Kaplansky | Credentialed K–12 Teacher | survey |
| 43 | Elizabeth | Bloom | Parent/Guardian of K–12 Student | survey |
| 44 | Jo Ellen | Anderson | Credentialed K–12 Teacher | survey |
| 45 | Debra | Petish | District Administrator | survey |
| 46 | Sofia | Sorensen | County Office of Education Administrator | survey |
| 47 | Debra | Lockwood | Teacher Librarian | survey |
| 48 | Vivian | Wong | Other (Education Attorney for Youth Justice Education Clinic, Loyola Law School) | survey |
| 49 | Laurence | Pichot | Parent/Guardian of K–12 Student | survey |
| 50 | Sarah | Yu | Parent/Guardian of K–12 Student | survey |
| 51 | Rachel | Hatcher Day | Teacher Librarian | survey |
| 52 | Amy | McMillan | Teacher Librarian | survey |
| 53 | Katharine | Sedgwick | Credentialed K–12 Teacher | survey |
| 54 | Diana | Weir | Not provided | email |
| 55 | Alicia | Raygoza | Credentialed K–12 Teacher | survey |
| 56 | Esti | Iturralde | Parent/Guardian of K–12 Student | survey |
| 57 | Lori | Parra | Parent/Guardian of K–12 Student | survey |
| 58 | Martha | Hernandez | Californians Together | email |
| 59 | Vickie | Ramos Harris | Advancement Project | email |
| 60 | Martha | Martinez | Other (Education non-profit/Professional development provider) | survey |
| 61 | Sharon | Merritt | College/University Faculty | survey |
| 62 | Katie | McNamara | Teacher Librarian | survey |
| 63 | Samantha | Tran | Other (Research/Advocacy) | survey |
| 64 | Kathleen | Sheppard | Teacher Librarian | survey |
| 65 | Karin | Linn-Nieves | County Office of Education Administrator | survey |
| 66 | Kristine | Alexander | Other (The California Arts Project) | survey |
| 67 | Lisa | Rivera | County Office of Education Administrator | survey |
| 68 | Amy | Tompkins | Parent/Guardian of K–12 Student | survey |
| 69 | John | Hamrick | Teacher Librarian | survey |
| 70 | Timothy | Budz | County Office of Education Administrator | survey |
| 71 | Rene | Hohls | Teacher Librarian | survey |
| 72 | Nancy | White | Other (UCSF-Pediatrics-Adolescent & Young Adult Medicine UCSF Dyslexia Research Center International Dyslexia Association) | survey |
| 73 | Lisa | Bishop | Teacher Librarian | survey |
| 74 | Maureen | Graves | California Association for Parent-Child Advocacy | email |
| 75 | Deberah | Schlagel | Parent/Guardian of K–12 Student | email |
| 76 | Jan | Gustafson Corea | California Association for Bilingual Education | email |
| 77 | Lori | DePole | Other (Open Letter)[[1]](#footnote-2) | email |
| 78 | E. Toby | Boyd | President, California Teachers Association | email |

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## Table 2: Introduction Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Velasco | N/A | I appreciate the thoughtfulness around setting the "Why" for this work including: 1. Student demographic data 2. Outcomes of the plan via the logic model | Not actionable. |
| 2 | Ballesteros | N/A | Action to support and build local capacity through alignment of literacy initiatives that engage family and community to address the needs of children who are not meeting by third grade academic english proficiency is equitable. | Not actionable. |
| 3 | Stern | N/A | The problem with the state’s dyslexia’s guidelines is that they are not mandatory. School districts just won’t do it until they have to. This document is well written but it lacks the specifics to help dyslexic students. I kept reading “high quality” but again without specifically defining it, School districts will have their own interpretation. California needs to have mandatory testing in kindergarten for dyslexia. They need teachers who are trained in structured, research based programs. Dyslexic students need this help in kindergarten, not when they reach third grade or middle school. They also need it taught with fidelity. Please require California teachers to be specifically trained to teach dyslexic students to ensure a high quality education. | Not recommended. Building school capacity to support students struggling with reading, including, but not limited to, students with disabilities and students with dyslexia has been established in the SLP as a statewide literacy priority for transitional kindergarten through grade five. Statewide activities to address this priority will be aligned to the *California Dyslexia Guidelines*. |
| 4 | Schneider | 9, 11 | p9: "the purpose of the SLP is to align and integrate state literacy initiatives, content standards, and state guidance documents to support teachers of students, birth through grade 12." 1) Teacher librarians in our schools are literacy leaders of students, yet they are not mentioned ONCE in this section (and only once after). 2) Libraries are where students' literacy is enacted, practiced, supported, encouraged, motivated, made manifest, yet not mentioned. 3) State guidance documents should include the CA Model School Library Standards, yet they are not mentioned in this document. p11 Inputs in Logic model do not include CA Model St Lib Stds p11 Outputs cannot identify literacy leads and supports without acknowledging libraries p11 desired "increased st achievement in literacy" is proven (in multiple studies) to be higher at schools with cert library staff, even when controlling for the SES of the school population, yet not mentioned here | Recommended. The *California Model School Library Standards* will be added to the Logic Model. |
| 5 | Lane | 10 | P. 10 - bullet 2 references "state literacy initiatives, content standards, and state guidance documents"; this would be an ideal spot to add CA Model School Library Standards. This document is not mentioned once throughout the entire Plan. The introduction alone provides much opportunity to do so, as strong school libraries, with credentialed Teacher Librarians and support staff are the heart and soul of any literacy program. | Recommended. The *California Model School Library Standards* will be added to the SLP Logic Model. |
| 6 | Houghton | N/A | State Literacy Plan Model does not include CA Model Library Standards in Inputs or access to early literacy and k-12 independent reading enrichment in Activities or creating life-long readers under Outcomes | Recommended. The *California Model School Library Standards* will be added to the SLP Logic Model. |
| 7 | Archon | 11 | As I review the introduction section I see on page 11 (State Literacy Plan Logic Model) that the sources for input do not include the Model School Library Standards (MSLS) adopted in 2010. One of the most effective ways to get access to quality literature is through the resources and services provided in a school library. Some important part of literacy include media literacy and information literacy. The only educator in CA whose credential qualifies them to teach information literacy (including the MSLS) is a Teacher Librarian. Countless studies has proven that literacy levels increase when a school has a strong school library program staffed by a Teacher Librarian. | Recommended. The *California Model School Library Standards* will be added to the SLP Logic Model. |
| 8 | McKeeman Rice | N/A | I would love to see an emphasis on the science of reading and a focus on functional literacy through the emphasis on the science of reading. We need to teach students to read because illiteracy is an equity issue, and without targeted, intentional reading instruction, this equity gap will persist. | Not recommended. One of the purposes of the SLP is connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. It is not meant to establish new guidance on literacy curriculum or instruction. |
| 9 | Turkie | N/A | The goal of this document is to "align state literacy initiatives, content standards, and state guidance documents," however the Model State Library Standards (MSLS) are not included. In fact, they have been intentionally excluded. Over 30 state research studies support and show a direct positive correlation between a well resourced library, headed with certificated Teacher-Librarian (TL),and significantly improved academic achievement in Science and Social Science, as well as ELA. This fact speaks to the SLP's development and implementation of an "evidence based plan." Access is integral to equity. The MSLS needs to be represented in the Logic Model as an Input. "a world class 21st-century education" is predicated on an expanded model of literacy that includes print, digital, technological, visual, and information literacy. TLs are called out as audience members for this document, but ignored as part of the distributed leadership team needed to positively impact literacy. | Recommended. The *California Model School Library Standards* will be added to the SLP Logic Model. |
| 10 | Vang | N/A | The introduction includes the California’s context and resources, but it does not provide and lacks the research to support the “science of reading.” | Not recommended. The SLP supports continuous improvement of state and local literacy programs by connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. It is not mean to establish new guidance on literacy curriculum or instruction. |
| 11 | Hurd | N/A | It is a mistake for the State Literacy Plan to not establish much needed new guidance for curriculum and instruction in Literacy. It is time for California to shed the philosophies and practices that do not align with what decades of research on reading acquisition and intervention show to be most effective and efficient. Our teachers, administrators, and Directors of Curriculum & Instruction need clear and concise guidance on how to improve reading, spelling and writing instruction, not another generic document that perpetuates the status quo and only inserts references to a few new sources of information. | Not actionable. State guidance for curriculum and instruction is developed through a statutory process. |
| 12 | Fisher | N/A | Wait - we passed AB1369 a few years ago - why isn't that the foundation for this literacy plan? This plan seems to be counter to the Dyslexia Guidelines. Why aren't we using the latest research in reading science to develop this very important plan? We need to focus on structured literacy and universal screening. | Not actionable. The *California Dyslexia Guidelines* are included in the Comprehensive and Integrated Literacy Model and state-level activities to support students with disabilities will be aligned to the guidelines. |
| 13 | Aste | 11 | Needs a strong vision for the state and where we hope to be after five years of implementation; possibly identifying some goals for students, instruction, and programs. page 11 In the Activities column when referring to high-quality literacy add “and biliteracy” programs. Then carry the theme of biliteracy across the Outputs and Outcomes columns. | Recommended. The SLP Logic Model will include “biliteracy” programs. |
| 14 | Hernandez | N/A | In the Activities column when referring to high-quality literacy add “and biliteracy” programs. Biliteracy should be added to the Outputs and Outcomes columns. | Recommended. The SLP Logic Model will include “biliteracy” programs. |
| 15 | Sapien | 11 | Needs a strong vision for the state and where we hope to be after five years of implementation; possibly identifying some goals for students, instruction, and programs. Page 11: In the Activities column when referring to high-quality literacy add “and biliteracy” programs. Then carry the theme of biliteracy across the Outputs and Outcomes columns. | Recommended. The SLP Logic Model will include “biliteracy” programs. |
| 16 | Schlagel | 10 | Begin by including the State’s definition of the following: literacy, comprehensive, “evidence based family literacy strategies”, “increase educational options”, and “improve student outcomes”. Broad, nebulas words and phrases perpetuates the status quo and does not provide clear guidance to Local Education Agencies (“LEA”). Moving from 25% standards met to 25.01% is technically an “improved student outcome”, but it is not the change parents and taxpayers are looking for. The cost allocation of the $37.5 million dollar grant should also be provided. What % of students meeting standards (without lowering them) is the goal? What are documented challenges being solved? How many solutions are being provided? The LEA should not be responsible for the definition/diagram; this is the State’s role. Teacher demographics should be provided. There is a typo/grammatical error on page 10, under Plan Purpose; should be “meant”. | Recommended. A glossary will be added. Typographic error on page 10 will be fixed. |
| 17 | Peterson | 9, 12, 14 | Global comment Throughout the document add “and biliteracy” after “literacy.” Page 9 - Introduction Add California World Languages Standards and Framework to the opening paragraph. The California World Languages Standards demonstrates the integral role that literacy plays in empowering informed, productive, and emotionally intelligent global citizens. Page 12 Add: “In addition to developing proficiency in English and subject-specific content literacy, students should be offered the opportunity to develop communicative and cultural proficiency and literacy in their home language and other world languages and cultures. The development of literacy and biliteracy is critical to foster students’ ability to communicate and collaborate across differences as well as to become informed, productive, and resilient global citizens.” Page 14 California Student Demographics Include a graph showing the vast number languages spoken in students’ homes. Acknowledge students as “emergent bilingual” r | Recommended: Language regarding biliteracy will be added to the Introduction. All content standards and Curriculum Frameworks are included in the Comprehensive and Integrated Literacy Model section. However, language will be added to that section regarding the *California* *World Language Standards*. |
| 18 | Williams | 9, 11 | p.9 - Teacher librarians instruct students, administer vast collections of resources and materials, provide readers advisory, promote strong information literacy skills; and they are not mentioned even one time in this document. Research <https://keithcurrylance.com/school-library-impact-studies/> show without a doubt how the library team of credentialed teacher librarian and support staff, by their very presence and the activities they conduct, raise literacy rates across the school site. p.11 outputs - the CA Model Library Standards are not mentioned and they provide a scaffold for instruction in all literacies not only as partners with their classroom colleagues but as research support for Administration, and Administrators of the largest collection of materials on (and virtually on) campus. | Recommended. All SBE-adopted standards will be included in the SLP Logic Model. |
| 19 | Linden | N/A | I do not see any reference to the CA Model School Library Standards in the introduction. It seems that the state standards that guide library media centers, teacher librarians, and school library paraprofessional staff members should be included in any plan to "integrate state literacy initiatives, content standards, and state guidance documents to support teachers of students, birth through grade 12." Statement taken directly from Plan Purpose section. | Recommended. All SBE-adopted standards will be included in the SLP Logic Model. |
| 20 | Onofre | N/A | Needs a strong vision for the state and where we hope to be after five years of implementation; possibly identifying some goals for students, instruction, and programs. | Not recommended. Goals are provided in the Outcomes of the SLP Logic Model. |
| 21 | Mejia | N/A | I appreciated the listing of the stakeholders and policies providing guidance and input in the document. I understand that there is a Roadmap being developed for African American students and would hope that this document would be included as well. It isn't rolling out until the spring, but it would be remiss not to include it. The logic model impacts understanding as foundational guiding documents. | Not recommended. New policy documents may be incorporated as the SLP is revisited over the life of the CLSD grant. |
| 22 | Spiegel Coleman | N/A | It would be helpful and create a framework for reading and developing local plans if there was a clear and strong vision for the state literacy plan with goals for what we hope to accomplish after five years. The logic model is helpful and clear. I suggest that you add after "high quality literacy" you add "and biliteracy" programs. By addition this then biliteracy elements should be added in the next two columns to have a "through" line on the logic model. | Recommended. “Biliteracy programs” will be added to the Activities of the SLP Logic Model. |
| 23 | Kaplansky | N/A | When referring to high-quality literacy add “and biliteracy” programs. Then carry the theme of biliteracy across the Outputs and Outcomes columns. | Recommended. “Biliteracy programs” will be added to the Activities of the SLP Logic Model. |
| 24 | Petish | N/A | Why doesn't the State Literacy Plan establish guidance for curriculum and instruction in Literacy? It is time for California to shed the philosophies and practices that do not align with what decades of research on reading acquisition and intervention show to be most effective and efficient. As a Director of C and I, I need clear and concise guidance on how to improve reading, spelling and writing instruction, not another generic document that perpetuates the status quo and only inserts references to a few new sources of information. | Not actionable. State guidance for curriculum and instruction is developed through a statutory process. |
| 25 | Sorensen | N/A | given the priority given to family involvement, especially to address needs of more vulnerable children such as ELs, consider more explicitly stating the need to promote, develop and support literacy in primary languages other than English; also consider adding an outcome specific to this priority to the logic model; in addition to numbers in demographics, include percentages to better contextualize or use a chart/graph | Recommended. Language regarding the importance of biliteracy from state guidance and policies will be added to the Introduction. Percentages will be added to the numbers provided in the California’s Diversity section. |
| 26 | Lockwood | 9, 11 | Page 9 Introduction The SLP goals are to address concerns with disadvantaged and students living in poverty. Disadvantaged and socio-economically challenged students have limited access to print materials and yet the SLP does not mention the importance of school libraries and certificated teacher librarians (TL) as potential ideas for inclusion in LEA literacy plans. Page 11 State Literacy Plan Logic Model does not include the SBE adopted Model School Library Standards (MSLS) as an input and does not include any quantitative data that evaluates the quality of the school library program. | Recommended. All SBE-adopted standards will be included in the SLP Logic Model. |
| 27 | Wong | 11 | Needs a strong vision for the state and where we hope to be after five years of implementation; possibly identifying some goals for students, instruction, and programs. On page 11, in the Activities column when referring to high-quality literacy add “and biliteracy” programs. Then carry the theme of biliteracy across the Outputs and Outcomes columns. | Duplicate comment. See response above. |
| 28 | Hatcher Day | N/A | The introduction gives a snapshot of the history of literacy ed, yet does not include any reference to librarianship or libraries. The intro says the literacy plan will support teachers, but not librarians. | Recommended. All SBE-adopted standards, including the *California Model School Library Standards*, will be included in the SLP Logic Model. |
| 29 | McMillan | N/A | Please include the Model School Library Standards for California Schools (2011) https://www.cde.ca.gov/be/st/ss/documents/librarystandards.pdf School libraries are a crucial component to a quality school literacy program. | Recommended. All SBE-adopted standards, including the *California* *Model School Library Standards*, will be included in the SLP Logic Model. |
| 30 | Sedgwick | N/A | I would like to see some 5 year goals for students, instruction and programs. We need to see what the strong vision is and what it looks like when we get there. | Not recommended. Goals are provided in the Outcomes of the SLP Logic Model. |
| 31 | Raygoza | N/A | The introduction should include a strong vision for the state that includes where we hope to be in five years after implementation of the State Literacy Plan. An emphasis should be placed on the development of literacy across all content areas. When referring to high quality literacy, it would make sense to include biliteracy programs, especially with the passage of Proposition 58 and the importance of multilingualism in our great state. | Recommended. “Biliteracy programs” will be added to the Activities of the SLP Logic Model. All SBE-adopted standards will be included in the SLP Logic Model. |
| 32 | Iturralde | N/A | Literacy is a crisis in our state and these funds are strongly needed. Unfortunately, there is widespread use of poor-quality reading instruction in California, specifically a method known as "balanced literacy." These practices provide low-quality instruction in foundational skills, which is exactly the opposite of what vulnerable readers need to achieve adequate literacy. This plan needs to attend to the needs of all readers by ensuring the use of high-quality, evidence-based instructional methods. The current draft plan fails in this respect. | Not actionable. Increasing capacity for teaching foundational skills is identified as a statewide priority in the SLP. |
| 33 | Hernandez | N/A | We suggest including a strong vision for the state and where we hope to be after five years of implementation - possibly identifying some goals for students, instruction and programs. This section would also be strengthened by including a discussion about literacy developing across content areas and not just through the English Language Arts classes or instruction. We appreciate the logic model, and we suggest in the Activities column when referring to high quality literacy add “and biliteracy” programs. Then, carry the theme of biliteracy across the Outputs and Outcomes columns.· Outputs - # of local literacy and biliteracy plans…….· Outcomes – where literacy is referenced include biliteracy | Recommended. “Biliteracy programs” will be added to the Activities of the SLP Logic Model. All SBE-adopted standards will be included in the SLP Logic Model. Literacy across the content areas is discussed in the SLP on pages 23 and 80. |
| 34a | Ramos Harris | 14, 15, 11 | It is critical to meaningfully integrate the comprehensive early learning and care system for birth to age 5 in this SLP. There is limited guidance on the integration of early childhood and biliteracy.- Pg.14: Does early learning and care programs only refer to CSPP programs in this literacy plan? Publicly subsidized programs? - Pg. 15 mentions 27% DLLs for early learning and care programs. This does not accurately represent the 60% of children Birth to Age 5 in California who are DLLs across the mixed delivery system. It is important to recognize that ECE and TK-12 are currently functioning as disparate systems and state leadership is needed to build cohesion across the two systems. - Speak to the complexity of programs in early childhood and how it is more complex than K-12 (complexity of funding). Include early childhood like it is and not through the K-12 lens.- Should consistently weave/mention birth through age 5 language throughout the document. | Recommended. For this section, additional early learning resources will be added to the Inputs of the SLP Logic Model and “biliteracy programs” will be added to the Activities.  Information regarding the importance of collaboration between early childhood education programs and K–12 systems will be included throughout the plan, as appropriate. |
| 34b | Ramos Harris (continued) | 11,15 | It is essential to ensure biliteracy is meaningfully integrated in the SLP logic model (pg.11), in the activities and outcomes sections, and woven throughout the entire Plan.- Page 11 Inputs/Resources: need to include early childhood resources such as Preschool English Learner Guide, DRDP, etc. Include measures that capture changes in practice, beyond webinar participation and attendance.- Revise outcome third bullet to include: “To administer and interpret appropriate biliteracy measures for DLLs/ELs.”- Revise activities compilation of literacy program tools to include: “Including biliteracy program planning tools, templates, protocols and examples”- It’s not clear where/how 0-5 is included/reflected in the outcomes in the logic model. Pg.15 Appreciate that the Plan explicitly recognizes the importance of the rich diversity of California, and it is critical to build on that by explicitly including the goal of biliteracy/multiliteracy starting from birth. | Recommended. Language regarding biliteracy from state guidance and policies will be added to the Introduction. |
| 35 | Martinez | N/A | The state's policy guidance around assets-based instruction for ELs and about the importance of biliteracy for all students is highlighted in other sections of the plan, but these elements are not integrated in the Logic Model. At a minimum, the Activities column should explicitly reference the "Compilation of high quality literacy AND BILITERACY program planning tools, templates, protocols, and examples", the Outputs column should monitor the "# OF ELs SERVED, and the # of grant program participants THAT OFFER BILINGUAL PROGRAMS", and the Outcomes column should include "Increased local capacity to TO ADMINISTER AND INTERPRET APPROPRIATE BILITERACY MEASURES TO ASSESS BILITERACY DEVELOPMENT FOR DLLs/ELs." | Recommended. “Biliteracy programs” will be added to the Activities of the SLP Logic Model. |
| 36 | Merritt | N/A | Would have liked to see reference to the Global 2030 initiative in reference to biliteracy and dual language education as part of the foundation for the literacy plan. Would have been good to include the State Seal of Biliteracy guideslines and Californians Together Multiple Pathways to Biliteracy as part of the inputs/resources in the chart. Biliteracy is left out of the discussion from the beginning. | Recommended: Language regarding biliteracy from state guidance and policies will be added to the Introduction. “Biliteracy programs” will be added to the Activities of the SLP Logic Model. |
| 37 | McNamara | N/A | State guidance needs to incorporate Model School Library Standards as well as the role teacher librarians play in the advancement of literacy beyond merely access of books. Libraries with strong collections purposefully curated by teacher librarians is key to providing access and relevant selections. Librarians are essential in closing the literacy gap our students face. Improving literacy minimizes the school to prison pipeline. Additionally, the plan needs to value secondary students. | Recommended. All SBE-adopted standards, including the *California Model School Library Standards*, will be included in the SLP Logic Model, and guidance regarding libraries and teacher librarians from the *California Model School Library Standards* and *English Language Arts/English Language Development* (*ELA/ELD*) *Framework* will be incorporated throughout the plan as appropriate. |
| 38 | Tran | 11 | Needs a strong vision for the state and where we hope to be after five years of implementation; possibly identifying some goals for students, instruction, and programs. Page 11 In the Activities column when referring to high-quality literacy add “and biliteracy” programs. Then carry the theme of biliteracy across the Outputs and Outcomes columns. | Duplicate comment. See response above. |
| 39 | Sheppard | N/A | The CA 2010 Model School Library Standards should be included in the Inputs/Resources column. The MSLS are aligned with CA CCSS ELA/Literacy Standards because “Standards lay out a vision of what it means to be a literate person in the 21st century. Students need access to high-quality literary and informational texts that build knowledge, enlarge experience and broaden worldview.” MSLS and CA CCSS ELA/Literacy and ELD “stress the shared responsibility for reading in a school.” (CCSS ELA/Literacy Introduction). Certificated Teacher Librarians provide reading guidance, equitable access to print & digital curated resources for class assignments, personalized reading as promote a love of reading. AASL Standards state “reading is the core of personal and academic competency. The Teacher Librarian supports, supplements, and elevates learners’ literary experience through guidance and reading initiatives, curated OER, evaluation and selection and access to digital and print materials. Resear | Recommended. All SBE-adopted standards, including the *California Model School Library Standards*, will be included in the SLP Logic Model, and guidance regarding libraries and teacher librarians from the *California Model School Library Standards* and *ELA/ELD Framework* will be incorporated throughout the plan as appropriate. |
| 40 | Tompkins | N/A | As an adult dyslexic raising a child with dyslexia, this document does nothing to demystify what an appropriate literacy program should include. I was so disappointed to see that the main reason for this document was completely forgotten, the struggling reader! This document relies heavily on allowing districts to use their current inappropriate programs that don't meet the needs of struggling readers. This document uses the same old terminology over and over but the plan does nothing to create a clear path to improving literacy. Literacy starts with teaching general education teachers Structured Literacy. Next, creating a sold MTSS assessment program that actually identifies deficits and has appropriate Structured Literacy programs to teach phonological awareness, phonemic awareness, orthographic awareness, and Structured Word Inquiry... in the General Education Classroom! This top-heavy approach will not help the kids that really need help. | Not actionable. Supporting students who are struggling with reading is a statewide priority identified in the SLP. Activities to address this priority will be aligned to the *California Dyslexia Guidelines*, among other state guidance and policies. |
| 41 | Hamrick | N/A | School Libraries have a profound effect on creating a culture of literacy in which diverse groups find themselves and learn empathy toward other perspectives. The vision of serving a diverse public equitably needs to feature inclusivity in access to books and other media that are equally diverse. | Not actionable. |
| 42 | Hohls | 11,12 | P11 SLP Logic Model: Model School Library Standards in the Inputs/Resources column and should be included in order to more fully meet student learning when independently reading and reading across literary and informational texts. Library professionals are more important than ever to the success of students in meeting the CA CCSS for ELA/Literacy standards for reading, writing, listening, and speaking. (Chapter 11: Implementing High-Quality ELA/Literacy and ELD Instruction p. 996). P12 Audiences for the SLP: teacher librarians are called on directly in paragraph 2 to learn about the comprehensive and integrated literacy model, and their role as an instructional collaborators and partners directly contributes to student achievement in all areas of literacy, not only with print materials, but also in areas of digital literacy. However, the Model School Library Standards, designed to be taught collaboratively within the curriculum, are not included as a part of the literacy foundation. | Recommended. All SBE-adopted standards, including the *California Model School Library Standards*, will be included in the SLP Logic Model, and guidance regarding libraries and teacher librarians from the Model School Library Standards and *ELA/ELD Framework* will be incorporated throughout the plan as appropriate. |
| 43 | White | N/A | The SLP contains lofty descriptions of outcomes but next-to-nothing in details about HOW to get students who are not going to learn in spite of us to attain those levels of achievement. Patchwork or piecemeal approaches are not the answer to helping our most vulnerable learners. A comprehensive integrated approach with depth and breadth will be necessary—and with the intensity and duration needed to ensure that each of our children becomes an independent reader and writer at increasingly higher levels of functional use. Keeping our goals for instruction in mind will always be important. However, teachers cannot begin instruction at the level of the ultimate goal. Deep reading of grade level academic text may be the goal—the destination. The journey to get to that destination must begin with explicit step-by-step teaching of all the components of oral and written language that each student lacks in order to acquire the skills to move along on that journey to the destination. | Not actionable. Activities supported by the CLSD grant will be aligned to state guidance and policies related to literacy curriculum and instruction. |
| 44 | Bishop | 11, 12 | Teacher librarians are called out in the second paragraph of P12 to learn about the comprehensive and integrated literacy model, and their role in collaboration contributes to and is responsible for student achievement in literacy. Yet the Model School Library Standards designed to be taught collaboratively in the context of the curriculum are not included as a foundation for literacy. P11 State Literacy Plan Logic Model – the Model School Library Standards should be included in the Inputs/Resources column. Include them because, “Given the demands for independent reading and reading across the range of literary and informational texts in the CA CCSS for ELA/Literacy and the CAL ELD Standards, library professionals are more important than ever to the success of students in achieving the standards (Chapter 11: ImplementingHigh-Quality ELA/Literacy and ELD Instruction p. 996). They are trained to do all of that mentioned. | Recommended. All SBE-adopted standards, including the *California Model School Library Standards*, will be included in the SLP Logic Model. |

## Table 3: Comprehensive and Integrated Literacy Model Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Velasco | N/A | While I appreciate all of the appropriate pieces mentioned that are necessary for a robust literacy plan and the cycles necessary to gain data and check for upward movement, the most glaring missing component is professional learning for multiple subject pre-service teachers AND current Pk-3. Teachers, while expected to pass the RICA (to show mastery on classroom delivery of foundational reading) do not enter the classroom with enough brain science and pedagogy on how to effectively teach phonemic awareness and phonics so that students emerge with word attack skills coupled with metacognitive processes. Across most districts we currently count on textbooks to teach teachers how to teach phonics. Pre-service programs, while well intentioned, have not and continue not to provide adequate preparation to prepare teachers to best deliver reading instruction especially to our most critical groups- EL's and SPED students. We will never achieve the outcomes asserted in this plan without | Recommended. The California Literacy Teaching Performance Expectations, adopted by the Commission on Teacher Credentialing in November 2019, will be added to the Comprehensive and Integrated Literacy Model section.  Building teacher capacity for Tier 1 foundational skills and reading comprehension, including best first reading and writing instruction, and increasing sustainable high-quality professional learning systems, including coaching models, have been established in the SLP as statewide priorities for transitional kindergarten through grade five. |
| 2 | Foster | N/A | We need to follow the science of reading. All students will benefit greatly from structured literacy-not balanced literacy. We need great curriculum in the general ed classroom! Some examples are Sonday and Wilson. Those companies also make programs to use for intervention is the SPED classroom. All students must be screened for dyslexia in kindergarten. All teachers need to be trained about dyslexia: | Not recommended. Building teacher capacity for Tier 1 foundational skills and reading comprehension, including best first reading and writing instruction, and building school capacity to support students struggling with reading, including, but not limited to, students with disabilities and students with dyslexia have been established in the SLP as statewide priorities for transitional kindergarten through grade five. Statewide activities to address these priorities will be aligned to state policy and guidance documents, including California Frameworks and the *California Dyslexia Guidelines*. |
| 3 | Ballesteros | N/A | Focus on the alignment and integration literacy model will support continuous learning for California's children's who are struggling with mastery of Academic English needed to succeed in schools. Inclusive equitable systems of schooling with high levels of engagement, from all stakeholders may be the turning point for California's children who are learning how to be successful and keep their home language. | Not actionable. |
| 4 | Schneider | 16–18, 20, 21, 34 | P16 “Comprehensive SLP provides an opportunity to align and integrate” multiple state docs and policies, but ignores doc called Model St Lib Stds P17-18 libraries and staff operate at Tier 1 and Tier 2 to support literacy for all students in T1 as well as intensive, differentiated support for students in T2; ex: T1 resources include materials that support content & information literacy p20 ELA/ELD graphic: Outer Ring addresses the information literacy that is the primary focus on library instruction; in White Context Field “engaging, motivating, and intellectually challenging” works and support for accessing them are what libraries provide to all students p21 "Meaning making is at the heart of literacy;" libraries exist to support students to practice the real-life skills of meaning making about the info, knowledge, and human condition to be found in library materials; textbooks do not serve this need p34 Every part of the "whole child" supported by library services & materials | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 5 | Lane | 18–20 | Strong school libraries support LCFF State Priorities. P. 18 "The State Priorities established in the LCFF legislation are included in the Comprehensive and Integrated Literacy Model to illustrate how local literacy programs can leverage LCFF and the LCAP to support comprehensive and integrated programs" - This should include the CA Model School Library standards, the evidence-based need for strong school libraries, and information literacy instruction and collaboration by Teacher Librarians. P. 19 - School libraries address Tiers 1 and 2 specifically "inclusive & equitable" through providing diverse print and digital materials, information literacy, and SEL supports p 20 - add CA Model School Library Standards, as they too should also be a guide to meeting literacy objectives. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 6 | Riveire | N/A | Your model is lacking well-documented connections between reading readiness, literacy and MUSIC learning. You can see the research list documented on the Brainvolts website of Northwestern University. They have 20 years of studies showing the connections between brain development from music learning and doing and the areas of the brain used for distinct skills in language and reading acquisition. While the connection was understood in the 1950s-60s-70s, it is no longer common knowledge. Many elementary schools in CA have no sequential music curriculum (indeed no elementary music instruction at all in many cases!)--in spite of Ed Code requiring the instruction of music at the elementary level. Attention to this detail in your MODEL, showing the integration of brain development through music study, would have deep and lasting impact in literacy development statewide. The website is brainvolts.northwestern.edu. | Not recommended. The SLP is not meant to establish new guidance on curriculum or instruction. The current draft emphasizes the importance of an integrated and interdisciplinary approach promoted in the *ELA/ELD Framework*. |
| 7 | Houghton | N/A | Tier 1 to Tier 3 doesn't include access to high quality age appropriate reading materials as are found in school libraries. It doesn't recognize that disadvantaged students generally have little to no access to high quality reading materials outside of the classroom. Lack of independent reading materials and certificated staff to guide students in their reading decisions becomes an access and equity issue for children from disadvantaged backgrounds. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 8 | Archon | N/A | This section does not include reference to the Model School Library Standards. Literacy skill development must include media and information literacy for our students to be productive and successful citizens. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 9 | McKeeman Rice | N/A | I would like to see a functional plan. This language speaks in generalities. States and schools that have made significant progress have completed inquiry cycles with root cause analysis that identifies which literacy practices are missing and then creates a tight and comprehensive plan around those practices. This creates a cohesive and specific plan that can target practices and have a chance of actually making an impact. | Not actionable. The plan includes a continuous improvement process, which includes analysis of needs and strategies to meet those needs. |
| 10 | Turkie | N/A | “High-quality literacy instruction occurs within the context of inclusive and equitable systems,” the exclusion of school library resources and TL instruction from the SLP is in direct opposition to this statement. CDE’s MSLS needs to be listed in Tier 1 graphic as a universal support for all students Under “Standards and Frameworks” MSLS need to be explicitly named and explained with a summary paragraph. There needs to be a subsection under “Learning in the 21st Century” that speaks to the design of the MSLS, as it is intended to support inquiry as a framework for learning, the acquisition of vital information literacy skills, applying responsible research practices, demonstrating ethical and respectful digital citizenship, and having students flourish as life-long learners. The core of the graphic on page 31 needs to include “Access” in addition to MTSS & Best First Instruction | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 11 | DePole | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP, as evidence-based screening, when conducted during the early grades, has been shown to help identify students at risk of reading failure during the window of time most optimal for effective reading intervention. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills | Not actionable. Structured literacy and universal screening are mentioned under the statewide literacy priorities for transitional kindergarten through grade five (Step 2), which will be implemented and supported through the state-level activities (Step 3) in alignment with the guidance found in the *ELA/ELD Framework* and the *California Dyslexia Guidelines*. The importance of the acquisition of foundational skills in order to progress in meaning making is stated on page 22. |
| 12 | M. Potente | N/A | Structured Literacy needs to be explained and prioritized in the SLP. It is largely absent, even though it is the instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in SLP. Details about the diagnostic measures involved, along with explicit guidance for how it fits within a MTSS need to be in SLP. The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching. The designation of “additional resources” should be removed from this section as the Dyslexia Guidelines deserve equal presence with the other guiding frameworks. | Recommended. References to the *California* *Dyslexia Guidelines* as an “additional resource” will be removed. |
| 13 | Hurd | N/A | "The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon the acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the Simple View of Reading should be included. Structured Literacy should be explained and prioritized in the SLP. It is largely absent, even though it is the essential instructional approach for some students learning to read and beneficial for all students and should be recognized as critical in first teaching. Figure 2 should be replaced with one that depicts the integration of literacy subskills and how they should be taught. Universal screening for struggling readers (signs of dyslexia and deficits in the language comprehension) should be expanded in the SLP, along with the use of diagnostic measures after screening and explicit guidance for how they fit into a MTS" | Not recommended. Structured literacy and universal screening are mentioned under the statewide literacy priorities for transitional kindergarten through grade five (Step 2), which will be implemented and supported through the state-level activities (Step 3) in alignment with the guidance found in the *ELA/ELD Framework* and the *California Dyslexia Guidelines*. The importance of the acquisition of foundational skills in order to progress in meaning making is stated on page 22. |
| 14 | Patterson | N/A | "The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. Structured Literacy needs to be explained and prioritized in the SLP. It is largely absent, even though it is the instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in SLP. Details about the diagnostic measures involved, along with explicit guidance for how it fits within a MTSS need to be in SLP. The Dyslexia Guidelines should be recognized as critical in first teaching. The designation of “additional resources” should be removed from this section as the Dyslexia Guidelines deserve equal presence with the other guiding frameworks." | Recommended. References to the *California* *Dyslexia Guidelines* as an “additional resource” will be removed. |
| 15 | A. Potente | N/A | The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. Structured Literacy needs to be explained and prioritized in the SLP. It is largely absent, even though it is the instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in SLP. Details about the diagnostic measures involved, along with explicit guidance for how it fits within a MTSS need to be in SLP. The Dyslexia Guidelines should be recognized as critical in first teaching. The designation of “additional resources” should be removed from this section as the Dyslexia Guidelines deserve equal presence with the other guiding frameworks. | Duplicate comment. See response above. |
| 16 | Fisher | N/A | We need to focus on structured literacy here. Where are the tiers of intervention? Where are the universal screening tools/measures/etc? In a nutshell: FOLLOW THE CA DYSLEXIA GUIDELINES!!! | Not actionable. State-level activities to support students with dyslexia will be aligned to the *California Dyslexia Guidelines*. |
| 17 | Aste | 18, 22, 26 | "p.18 The two resources included for improving instruction, the Dyslexia Guidelines and the Practitioner’s Guide for ELs with Disabilities, only address a small subset of our student population and are important documents but are misplaced and should not be included in Figure 1, but referenced in other sections of the plan. They are also not representative of all the resources CDE has available for the field. p.22 Add language that suggests that ELD standards be used in tandem with all other content area standards when developing lessons and in designing instruction. p.26 Only calling out Dyslexia and no other disorders or learning disabilities leaves out many special education and general education students with literacy needs. For English learners, there is a need for valid and reliable instruments to assess Dyslexia so as not to over or under identify students. List the California Practitioner’s Guide for Educating English Learners with Disabilities before the California Dyslexia" | Not recommended. The *California* *Dyslexia Guidelines* the *California* *Practitioner’s Guide for Educating ELs with Disabilities* are identified as Tier I resources because students with dyslexia and EL students with disabilities are general education students first.  Recommended: The language on page 22 will be revised to include all content area standards and “when developing lessons and in designing instruction.”  Not recommended: The CDE recognizes the range of disabilities that may influence literacy development. The *California* *Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 18 | Hernandez | N/A | "ELD standards should be used in tandem with all other content area standards when developing lessons and in designing instruction. Biliteracy in the state plan needs to be more explicit here, aligned with GLOBAL CA 2030." | Recommended: The language on page 22 will be revised to include all content area standards and “when developing lessons and in designing instruction.” |
| 19 | Sapien | 18, 22, 25, 26 | "P. 18: Two resources included for improving instruction, Dyslexia Guidelines and Practitioner’s Guide for ELs w/ Disabilities, only address small subset of student population and are important documents but are misplaced and should not be included in Fig 1, but referenced in other sections of plan. They are also not representative of all resources CDE has available for the field. P. 22: Add language that suggests ELD standards be used in tandem with all other content area standards when developing lessons and designing instruction. Page 25: Before section on Transitional Kindergarten, this would be good place to have section on Biliteracy making it clear it is a component of the state plan. P. 26: Only calling out Dyslexia and no other disorders or learning disabilities leaves out many special ed and general education students with literacy needs. For English learners, there is a need for valid and reliable instruments to assess Dyslexia so as not to over or under identify stude | Duplicate comment. See response above. |
| 20 | Schlagel | N/A | This plan is not comprehensive. “…high quality literacy instruction occurs within the context of inclusive and equitable systems…” means these are pre-requisites for the elements of this plan to be successful. This plan fails because our schools are not inclusive or equitable. How is CA going to create equity? In a school that is not equitable, how is the State going to remedy student failure? This document is full of nebulas terms and phrases. Define “…high quality first instruction…” How is the State going to ensure implementation of existing Diversity, Dyslexia Guidelines, Social-Emotional frameworks which are, at best, inconsistent? Why doesn’t this plan include FREE PRESCHOOL FOR ALL and free training to all preschool teachers (public and private) in structured literacy since a key factor in success is exposure to letters, sounds, words and subjects before Kindergarten? The model should include ensuring each child’s diversity is represented in the instruction curriculum. | Recommended. Glossary will be added.  SLP establishes activities for birth to age five. |
| 21 | Peterson | 22, 32, 29 | Page 22 Add: “English learners deserve the right to develop high levels of literacy in their home language as well as English.” Page 29 Figure 2 Comprehensive and Integrated Literacy Model Next to “Celebration of Diversity and Asset-Based Approach” add “World Languages Standards and Framework” to the list. Page 32 after CA Ed.G.E. Add “The California World Languages Standards address the literacies of the 21st Century Skills Map with pointed focus on: Information Literacy through which students—as “informed global citizens”—access, manage, and effectively use culturally authentic sources in ethical and legal ways; Technology Literacy through which students—as “productive global citizens”—use appropriate technologies when interpreting messages, interacting with others, and producing written, oral, manual, and visual messages; Media Literacy through which students—as “active global citizens”— evaluate authentic sources to understand how media reflect and influence language and cultur | Recommended. Language regarding biliteracy from state guidance and policies will be added to the Introduction. Language from the *California World Language Standards* will be added regarding the different literacies students acquire. |
| 22 | Luckey Treiber | N/A | The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. | Duplicate comment. See above for response. |
| 23 | Mullenger | N/A | The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. Structured Literacy needs to be explained and prioritized in the SLP. It is largely absent, even though it is the instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in SLP. Details about the diagnostic measures involved, along with explicit guidance for how it fits within a MTSS need to be in SLP. The Dyslexia Guidelines should be recognized as critical in first teaching. The designation of “additional resources” should be removed from this section as the Dyslexia Guidelines deserve equal presence with the other guiding frameworks. | Duplicate comment. See above for response. |
| 24 | Williams | 16-17, 18, 20–21 | p. 16-17 - Core instruction requires student practice. Teacher librarians offer the collaboration to support student acquisition of materials to engage in a way to keep that practice going. p. 17 - Teacher librarians can offer Professional Development and collaboration on and with classroom colleagues on effective strategies to support student engagement. p. 18 - Tier 2 and 3 require in-depth and targeted instruction and practice. Teacher librarians are effective partners in developing appropriate learning objectives, goals and activities to build strong readers. p. 20 - The activities accomplished in the Library reach all Outer Ring goals by increasing out-of-class 'real-life' activities while reaching student engagement, motivation, etc of the next ring through this programming. p. 21 - Making meaning is the core of library services and instruction and programming by the Teacher Librarian. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 25 | Linden | N/A | Mention of MTSS should include access for every student to their school library in Tier 1. Further, the section on Frameworks does not mention the CA Model School Library Standards. Those standards can be found at https://www.cde.ca.gov/be/st/ss/documents/librarystandards.pdf. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 26 | Onofre | N/A | Add language that suggests that ELD standards be used in tandem with all other content area standards when developing lessons and in designing instruction. | Recommended. The language on page 22 will be revised to include all content area standards and “when developing lessons and in designing instruction.” |
| 27 | Mejia | N/A | Focus on English Learners is essential to success of the initiative. Integrating these initiatives in the LCAP and Title III plans would be essential to ensuring the guidance is being implemented. An investment in Early Literacy should include reconciling the salary gap between pre school educators salaries and public school employees. | Not actionable. The State Priorities established in the Local Control Funding Formula (LCFF) legislation are included in the Comprehensive and Integrated Literacy Model to illustrate how local literacy programs can leverage LCFF and the Local Control and Accountability Plan (LCAP) to support comprehensive and integrated programs. Salaries are outside the scope of the SLP. |
| 28 | Spiegel Coleman | 18, 22, 25, 26 | Page 18 in Figure 1, I suggest you add the following under resources: English Language Development Standards Estandares en Español Spanish Language Development Standards When listing support for students with disabilities/SPED, throughout the document, it seems there should be some CDE resource that addresses all language processing and disabilities and not just Dyslexia Guidelines. The Practitioners Guides for Educating ELs with Disabilities does address multiple disabilities. There should be something or reference to a document outside of CDE that is all inclusive for English only students. This comment applies to Figure 1 on Page 18, 26 as well as other places in the document. On Page 22, it is important that ELD Standards are identified along with content standards when developing lessons and designing instruction. This lesson design element supports teachers in creating integrated ELD content lessons. Page 25: Before Transitional Kinder, add a section on Biliteracy. | Recommended: The *Common Core en Español* and the *Spanish Language Development Standards* will be included in the Comprehensive and Integrated Literacy Model. The language on page 22 will be revised to include all content area standards and “when developing lessons and in designing instruction.”  Not recommended: The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 29 | Kaplansky | N/A | Add language that suggests that ELD standards are used in tandem with other content area standards when developing lessons and in designing instruction. | Duplicate comment. See response above. |
| 30 | bloom | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills. Foundational skills receive some attention in the SLP, but LEAs need clearer explanation of how to teach them explicitly and sequentially. Coherent guidance based on evidence-based models of reading development | Duplicate comment. See response above. |
| 31 | Anderson | N/A | "Best First Instruction" should be clearly defined as structured literacy, based on the science of reading. The way it is currently written is open to interpretation and therefore unlikely to produce better outcomes than we currently have. In the description of the “Comprehensive and Integrated Literacy Model” the CA Dyslexia Guidelines are listed as an “additional resource” for tier 1 instruction. The designation of “additional resources” should be removed from this section as the CA Dyslexia Guidelines as well as the Practitioner's Guide for Educating ELs with Disabilities deserve equal presence with the other guiding frameworks. The CA Dyslexia Guidelines name the instruction necessary for learning to read and write for the most disadvantaged students and should be recognized as central to first teaching, not as an extra resource. There should be strong, clear language around the preparation of K-3rd grade teachers in evidence-based practices for teaching foundational skills. | Recommended. References to the *California* *Dyslexia Guidelines* as an “additional resource” will be removed. The California Literacy Teaching Performance Expectations, adopted by the Commission on Teacher Credentialing in November 2019, will be added to the Comprehensive and Integrated Literacy Model section. |
| 32 | Petish | N/A | The SLP draft does not describe a comprehensive, integrated ELA program. Literacy is dependent upon the acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the Simple View of Reading should be included. Why isn't structured literacy explained in the model? It is largely absent, even though it is the essential instructional approach for some students learning to read and beneficial for all students. There is a misconception that this approach is not helpful to language learners and bi-literate students. It therefore should be recognized as critical in first teaching. The role of universal screening for reading sub-skill development should be expanded in the model, along with the use of diagnostic measures after screening and explicit guidance for how they fit into a MTSS. | Duplicate comment. See response above. |
| 33 | Sorensen | N/A | consider explicitly mentioning the Common Core en espanol standards document to support biliteracy in Spanish keep explicit mentions of D-ELD and I-ELD and ELA/ELD framework summaries focus on building coherence from early learning to k-12 is key; some elements of the celebration of diversity and asset-based approach also belong in the well-supported teachers and leaders (ie EL Roadmap Principle 2,3 4) this might be all better organized by identifying some common themes of all these documents keep the explicit language on the importance of instructional coaches and will | Recommended. The *Common Core en Español* will be added to the Comprehensive and Integrated Literacy Model. |
| 34 | Lockwood | N/A | TLs in school libraries provide differentiated resources for all, yet no mention of school libraries. What is absent from the list of student info resources is peer reviewed, scholarly, vetted content from DB. TLs instruct students how to access DB info; important. instruction in middle/high school & prepares st. for college research. If the goal is support families the grant does not list the public library which is accessible by all members of the comm. & one of the greatest resources families in low SES situations have. School libraries & TLs support student learning across all subject areas. Inequity exist when students in wealthier districts have access to a library & students in rural, low income areas have limited or no access to a TL or school library. School libraries with TLs create a library environ. where students learn, thrive, feel safe & connected in an inclusive environ. TLs connect families to school thro outreach, programming, & access to resources for all students. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 35 | Wong | 18, 22, 25, 26 | Page 18: The two resources included for improving instruction, the Dyslexia Guidelines and the Practitioner’s Guide for ELs with Disabilities, only address a small subset of our student population and are important documents but are misplaced and should not be included in Figure 1, but referenced in other sections of the plan. They are also not representative of all the resources CDE has available for the field. Page 22: Add language that suggests that ELD standards be used in tandem with all other content area standards when developing lessons and in designing instruction. Page 25: Before the section on Transitional Kindergarten, this would be a good place to have a section on Biliteracy making it clear it is a component of the state plan. Page 26: Only calling out Dyslexia and no other disorders or learning disabilities leaves out many special education and general education students with literacy needs. For English learners, there is a need for valid and reliable instruments to a | Duplicate comment. See response above. |
| 36 | Pichot | N/A | The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. Structured Literacy needs to be explained and prioritized in the SLP. It is largely absent, even though it is the instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in SLP. Details about the diagnostic measures involved, along with explicit guidance for how it fits within a MTSS need to be in SLP. The Dyslexia Guidelines should be recognized as critical in first teaching. The designation of “additional resources” should be removed from this section as the Dyslexia Guidelines deserve equal presence with the other guiding frameworks. | Duplicate comment. See response above. |
| 37 | Hatcher Day | N/A | Again no mention of librarians or libraries. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 38 | McMillan | N/A | Since the Comprehensive and Integrated Literacy Model emphasizes the importance of "inclusive and equitable systems of schooling featuring high levels of engagement, a focus on continuous improvement." Teacher librarians have a mission to build inclusive school library environments and they work tirelessly to provide equitable access to diverse and relevant materials, including reading resources and technology resources. According to the AASL Framework for Learners, "As the leader of this space and its functions, the school librarian ensures that the school library environment provides all members of the school community access to information and technology, connecting learning to real-world events." | Recommended. The *California Model School Library Standard*s will be added to the Comprehensive and Integrated Literacy Model. |
| 39 | Sedgwick | N/A | We need to ensure when we talk about literacy, we are also talking about biliteracy. I know CDE has a lot of resources. It would be nice to see additional resources to support a wider set of our student population in CA. Even though the ELD standards were written from the ELA standards, I think it is imperative that ELD standards be used in tandem with all other content area standards when developing lessons and in designing instruction. All teachers should be providing Integrated ELD in all subject areas in order for ELs to thrive. Only calling out Dyslexia and no other disorders or learning disabilities leaves out many special education and general education students with literacy needs. For English learners, there is a need for valid and reliable instruments to assess Dyslexia so as not to over or under identify students. | Duplicate comment. See response above. |
| 40 | Raygoza | 18, 22, 25, 26 | On page 18, Figure 1, Multi-tiered System of Support, be sure to add to the Tier 1 resources: ELD Standards, CCSS en español, SLD Standards. The Dyslexia Guidelines and the Practitioners Guide for ELs with Disabilities seems to be misplaced. These resources do not reflect all that are available for the field through the CDE. Page 22 - In the first sentence referring to Designated and Integrated Language Development the word "shall" should be replaced with "should" both are required legally. Adding language to suggest the use of the ELD standards along with other content area standards when planning lessons takes into account our large population of English learners. Page 24 - Early Learning Foundations - highlight best practices and benefits of English and home language development. Page 26 - List the California Practitioner's Guide for Educating English Learners with Disabilities first since it does address a wider treatment of disabilities than the CA Dyslexia guidelines. | Duplicate comment. See response above. |
| 41 | Iturralde | N/A | The current plan unfortunately does not specify an appropriate theoretical model underlying instruction. This oversight will result in poor-quality practices that endanger our vulnerable readers. The plan does not emphasize models of reading instruction based on more than 20 years of scientific consensus (e.g., the National Reading Panel). The plan needs to make crystal clear that funded programs must use evidence-based instruction founded in a strong research basis. | Not actionable. CLSD activities will be evidence-based. |
| 42a | Hernandez | 18, 22, 24 | Page 18, Figure 1, Multi-tiered System of Support: We suggest the following be added to the Tier 1 resources: • ELD Standards • Estandares en Español • SLD Standards The two resources included for improving instruction, the Dyslexia Guidelines and the Practitioner’s Guide for ELs with Disabilities, only address a small subset of our student population and are important documents but we think are misplaced and should not be included in Figure 1, but referenced in other sections of the plan. They are also not representative of all the resources CDE has available for the field. Page 22: Under Designated and Integrated Language Development in the first sentence, the word, “shall” should be substituted for “should” since both are a legal requirement and not optional. The reference to the ELD standards and content instruction is good. It might be helpful to add language that suggests that ELD standards be used in tandem with all other content area standards when developing lessons and in designing instruction. Page 24: Early Learning Foundations: Include in this section best practices and benefits of English and home language development.. | Recommended. Revision will be made on page 22.  Not recommended. Page 24 addresses the importance of connecting the first and second languages and on creating paths to bilingualism for dual language learners.  All other comments are duplicates. See responses above. |
| 42b | Hernandez (continued) | 25, 26 | Page 25: Before the section on Transitional Kindergarten, this would be a good place to have a section on Biliteracy making it clear it is a component of the state plan. Page 26: We agree with including the California Dyslexia Guidelines but feel that there needs to be a broader treatment of the variety of processing disorders. Only calling out Dyslexia and no other disorders or learning disabilities leaves out many special education and general education students with literacy needs. For English learners, there is a need for valid and reliable instruments to assess Dyslexia so as not to over- or under-identify students. Considering all of the above, we suggest listing the California Practitioner’s Guide for Educating English Learners with Disabilities first since it does address a wider treatment of disabilities. Page 40: This would be a good place to include the work of the two EWIGs – EL Roadmap Implementation Grants, the EWIG Special Education grants – and the 21st Century California School Leadership Academy (CSLA) grants. Page 41: It would be helpful to include the need to provide supports in the home language for parents so they see their language as an asset and resource especially during school closures or hybrid delivery of instruction | Recommended. Language regarding biliteracy from state guidance and policies will be added to the Introduction.  Not recommended. Educator Workforce Investment Grant (EWIG) and California School Leadership Academy (CSLA) programs do not constitute state guidance or policy. Communicating in the family’s primary language is addressed on page 41. |
| 43a | Ramos Harris | 17, 24, 31, 32 | Pg.17 To ensure meaningful integration of Birth to Five in the SLP, there must be meaningful engagement and further vetting with the ECE community. Overall, there is a lack of cohesion between what’s mentioned for K-12 and what’s mentioned/applicable for birth to age five throughout the document. - Has there been a separate early childhood/infant toddler conversation on literacy/biliteracy goals and necessary supports? - Were there ECE stakeholders with expertise in infants and toddlers and birth to five for DLLs a part of the development of this plan? Did F5CA or its Association partake? Ensure DLLs are included alongside ELs ● Pg. 31: EL Roadmap: specify this is birth through 12th grade. ● Pg.32: include pathways awards for ECE for seal of biliteracy ● Pg.24: Preschool Learning Foundations (2005) needs to be updated with recent research on what’s best for DLLs - this was written at a time when focus was on ELD (rapid transition to English assumption, no clear support for home language in the foundation). | Recommended. Language will be added to the *English Learner Roadmap* section to clarify its application from early childhood to grade twelve.  Not recommended. Pathways for the State Seal of Biliteracy and the update of the *Preschool Learning Foundations* are outside the scope of the SLP. |
| 43b | Ramos Harris (continued) | 28, 29 | Pg. 28 Assessment system. Include in “systems should include…”: Training on administering and interpreting biliteracy measures. Pg.29 Section on High Quality First Instruction/MTSS. Figure 2 model discusses how TK-12 systems, state priorities, and policy guidance relate to an integrated literacy model. It would be important to work with ECE and DLL experts to understand the developmentally appropriate application/connection for the B-5 children as well as DLLs. Pg. 29 Teacher prep mentioned for K-12 but not for 0-5. Would be important to ensure there is a parallel discussion of teacher preparation in ECE (ECE competencies, Child Dev Permit, etc.). As the Plan acknowledges the importance of culturally and linguistically responsive ECE for young children, there needs to be resources and support for educators to support such learning. Family and Community Engagement: Recommend making the parent’s role in home language and literacy explicit. Include research on the early years setting the stage for language, literacy, and dual-language development. | Not recommended. Language on page 28 refers to all assessments used in the assessment system. The *Family Partnerships and Culture* document is referenced in the Family and Community Engagement section, which provides guidance on valuing families and their contribution to children’s learning.  Recommended. Teacher preparation for early childhood education will be added to the Comprehensive and Integrated Literacy Model. |
| 44 | Martinez | 28, 29 | On p. 28, the systems referenced in this language, "Systems should include protocols for analyzing data, a structure for participating in the protocols (e.g., professional learning communities, quarterly data conversations), how to use the analysis to inform instruction, and aligned common assessments, including vertical articulation," should also include "TRAINING ON ADMINISTERING AND INTERPRETING BILITERACY MEASURES." And, the Comprehensive and Integrated Literacy Model depicted in Figure 2 on p. 29 doesn’t really address Birth to 5. It does a decent job of discussing how TK-12 systems, state priorities and policy guidance relate to an integrated literacy model, but the caregiving and formal schooling for Birth- age 5 children isn’t governed by much of what is presented here. | Recommended: The Comprehensive and Integrated Literacy model will include teacher preparation for early childhood education.  Not recommended. Language on page 28 refers to all assessments used in the assessment system. |
| 45 | Merritt | N/A | In the Standards and Frameworks section, the CCSS en Español and the Spanish Language Arts Development Standards should be included -- they interact with the ELD/ELA standards all over the state. Not a comprehensive model without them! Circles of implementation: section in yellow on curriculum and instruction themes -- so important to include these in the order in which they are presented! Standards and Frameworks section does not include any content on Bilingualism or Biliteracy! Very surprising! The first time Spanish language instruction comes up is in the assessment section -- how can that be? How can we assess without reference to the standards and frameworks that exist for bilingualism and biliteracy in Spanish? Supporting Best First instruction: the two sections that refer to bilingualism/biliteracy (Global initiative and seal of biliteracy) do not advocate for particular actions or set out any goals or guidelines for enactment of either. Very incomplete. Assets based | Recommended. *Common Core en Español* and *Spanish Language Development Standards* will be added to the Comprehensive and Integrated Literacy Model. Language regarding biliteracy from state guidance and policies will be added to the Introduction.  Not recommended. *ELA/ELD Framework* themes are in the order they are presented in the framework summary. Biliteracy is included in the Comprehensive and Integrated Literacy model, which sets the direction for high-quality literacy programs and developing biliteracy whenever possible is addressed in the statewide literacy priorities. |
| 46 | McNamara | 19, 21, 23, 24, 33, 34 | p 19 Include how teacher librarians assist in increasing literacy. p 21 Textbooks do not improve literacy and rarely improve learning. Library materials help students make meaning and make connections. Quality library collections enable students to learn more of what they want and on their reading level in their preferred format. p 23-24 Inclusion and implementation of Model School Library Standards prepares our students for the world they are currently and will be in. p 33-34 Collaboration of classroom teachers and teacher librarians ensures books needed to provide windows and mirrors are available. Libraries continue to be a safe space haven where all are welcome, promoting respect and diversity. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 47 | Tran | 18, 22, 25, 26 | Page 18 The two resources included for improving instruction, the Dyslexia Guidelines and the Practitioner’s Guide for ELs with Disabilities, only address a small subset of our student population and are important documents but are misplaced and should not be included in Figure 1, but referenced in other sections of the plan. They are also not representative of all the resources CDE has available for the field. Page 22 Add language that suggests that ELD standards be used in tandem with all other content area standards when developing lessons and in designing instruction. Page 25 Before the section on Transitional Kindergarten, this would be a good place to have a section on Biliteracy making it clear it is a component of the state plan. Page 26 Only calling out Dyslexia and no other disorders or learning disabilities leaves out many special education and general education students with literacy needs. For English learners, there is a need for valid and reliable instruments to a | Duplicate comment. See response above. |
| 48 | Sheppard | 29 | “Students should learn how to critically harness and manage the power of these media for accessing, evaluating, creating and sharing information with local and global others. At the same time, teachers should ensure that students learn how to use technologies safely and ethically.” Teacher Librarians are dually certificated to teach all students information literacy, digital literacy and digital citizenship (CTC, https://www.ctc.ca.gov/docs/default-source/leaflets/cl562.pdf?sfvrsn=ab9780c3\_0). Information is defined in the MSLS to include four overarching areas: Student access information. 2. Students evaluate information. 3. Students use information. 4. Students integrate information literacy skills into all areas of learning. P29 Supporting Best First Instruction Section and Figure 2 Comprehensive and Integrated Literacy Model- The CA Model School Library Standards and school libraries connect across all academic disciplines, celebrate diversity and inclusion, where all students have | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 49 | Alexander | 23 | "Page 23 – Disciplinary Literacy and Integrating Curricula – first paragraph, first sentence below the goldenrod highlighted section. There is an opportunity to expand the readers’ perception of communities of discourse by including “artists” within the e.g. (e.g. scientists, historians, artists). In the next paragraph the last sentence “…with content knowledge and on another… is somewhat confusing. A possible rewrite might be – Students use the strands of the language arts within their disciplinary learning as they are read, write, speak, and listen to expand their specific disciplinary and integrated learning." | Recommended. Revisions align with the interdisciplinary approach of the SLP. |
| 50 | Tompkins | N/A | The SLP draft does not describe a comprehensive, integrated ELA program. It perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon primary acquisition of foundational skills. Coherent guidance based on evidence-based models, including Scarborough’s Reading Rope and the simple view of reading should be included. Structured Literacy needs to be explained and prioritized in the SLP. It is largely absent, even though it is the instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in SLP. Details about the diagnostic measures involved, along with explicit guidance for how it fits within a MTSS need to be in SLP. The Dyslexia Guidelines should be recognized as critical in first teaching. The designation of “additional resources” should be removed from this section as the Dyslexia Guidelines deserve equal presence with the other guiding frameworks. | Duplicate comment. See response above. |
| 51 | Hamrick | N/A | "inclusive and equitable systems of schooling" needs to acknowledge and address specific experiences that are present in some students' lives and absent in others. Among these experiences are access to a well curated and professionally staffed school library. Currently, kids less likely to have books and other enriching media at home are more likely not to have that access at school. To put a fine point on it, the kids most in need of Dr. Seuss books have never seen one. "differentiated learning, student-centered learning" happens in school libraries. That needs to be mentioned. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 52 | Budz | N/A | The emphasis on the five themes is appropriate especially Meaning-Making. I'm concerned that with "Science of Reading" emphasis across the US currently, that Meaning-Making is not considered until students have learned to read fluently. Also, the importance of school and classroom libraries with access to text was not mentioned. The state needs to place a priority of access to diverse, multicultural texts that reflect the diverse population of students in California schools. While the Five Themes was emphasized from the ELA/ELD Framework, no mention of being "Broadly Literate" from the Framework was included in the SLP. Besides professional learning in the form of webinars or presentations, instructional coaching is key for improvement. This needs to be emphasized more in the SLP. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. The Learning in the 21st Century section (p. 23) will be expanded to include information about the *ELA/ELD Framework* goals of students becoming broadly literate and acquiring the skills for living and learning in the 21st century, and definitions of specific literacies defined by the Partnership for 21st Century Skills will also be added. Additional references may be added throughout the document, as appropriate.  Not actionable. Instructional coaching is addressed in the Professional Learning section. |
| 53 | Hohls | 19, 23, 24, 33, 34 | P19 Standards and Framework Section: Insert a description of the Model School Library Standards and state their purpose as equitable centers of student literacy. P23-24 Learning in the 21st Century subsection: Add a paragraph describing the MSLS. These standards were crafted to guide instruction in 21st Century skills to prepare students for success in a competitive global economy powered by information. Students need information literacy skills in conjunction with ELA, ELD, and discipline literacies. The MSLS have four common principles across all grades: Learn to ACCESS, EVALUATE, USE, and INTEGRATE information in all areas of learning. P29 Supporting Best First Instruction Section and Figure 2: MSLS connect to ALL four sections of Figure 2. P33-34 Asset-Based Pedagogies: Quality library programs provide equitable access to materials in many languages and allow students to see a diverse world. (Chapt. 11: Implementing High-Quality ELA/Literacy and ELD Instruction p. 996, 997) | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |
| 54 | White | N/A | We need to focus on how to reverse our students’ failure to learn to read and write. That will not happen by simply “willing” them to read at their expected level of performance—based on age and grade placement—by giving them books years beyond their ability to read them. That can happen ONLY with targeted instruction that is comprehensive, integrated, intensive and lasts long enough to finish the job. Instead of succumbing to politics, the status quo, and publishers’ efforts to convince us to buy their products, we need to focus on what science tells us are the instructional approaches most effective for teaching struggling readers and writers—victims of poverty or trauma, systemic racism, English learners, and students with disabilities. We KNOW how to teach them to read…and we CAN teach them to read right now….even if we cannot solve the other problems quickly or all at once. Science must drive what happens in CA’s classrooms. | Not actionable. |
| 55 | Bishop | 19, 23, 24 | P19 Standards and Frameworks Section: the Model School Library Standards show how school libraries are a foundational support of broad literacy, not narrow. P23-24 Learning in the 21 st Century -The library standards were designed to help students learn and work with 21st century skills so students are prepared for success in a hyper competitive global economy powered by information and knowledge. Critically important for 21st century learners, students need to acquire information literacy skills in conjunction with their instruction in ELA, ELD, and disciplinary literacy classes. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model. |

## Table 4: SLP Continuous Improvement Process – Step 1: Set Direction and Purpose Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Velasco | N/A | What is appropriately presented is the through line from Pk-12, and the considerations, by grade span, to contribute to the overall goal of students emerging as effective critical thinkers, effective speakers and valuable contributors to our society. | Not actionable. |
| 2 | Ballesteros | N/A | The States recommendations to set direction by actually defining a mission, vision, goals and performance measures along with a statement of purpose and I would add the defined values that the LEA holds around the purpose of the literacy plan. The States plan provides a solid plan of action and direction to support the process. | Not actionable. |
| 3 | Schneider | N/A | As noted above, the direction and purpose cannot be properly set without awareness of and attention to the vital role of school libraries in developing, supporting student literacy, the CA Model State Library Standards, and the body of research showing the impact of certificated library staff on students' literacy achievement, regardless of student/community SES. This is a glaring omission in the SLP. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide. |
| 4 | Lane | N/A | This entire section lends itself to, at the very least, mentioning the role the school (and public for that matter) library supports K-12 literacy goals. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide. |
| 5 | Houghton | N/A | Library programs that teach and encourage parents or older siblings to read to their children model literacy early in a child's life. Such modeling promotes a culture of literacy inside the family. Certificated Librarians assist parents in selecting engaging age appropriate reading materials to read to their children. Access to a high volume of high quality student selected reading materials ensures that students continue their reading progress and become increasingly skilled readers K-6. Providing a variety of reading genres across the curriculum gives grades 7-12 readers a chance to expand their reading interests beyond the classroom and establishes life-long readers. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide. |
| 6 | Archon | N/A | I really like the literacy goals discussed in this section. One question that comes to mind is what are the students reading as they develop their literacy skills? Are they only reading their adopted textbooks and anthologies? What other resources are teachers and students expected to have access to to build literacy. If we think that students will be developing a love for reading by reading their textbooks then we might be misguided. Classroom libraries and school libraries must be a part of this plan. Especially in low income schools/districts there are very limited access to quality books. Why has this not been addressed in this plan? IF we are successful in helping students develop literacy skills but the students have nothing of interest for them to read then we have missed the most important part. Have a well resourced library and a Teacher Librarian to assist students and teachers in appropriate book selection should be included in this plan. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide. |
| 7 | McKeeman Rice | N/A | I would like to see a functional plan. This language speaks in generalities. States and schools that have made significant progress have completed inquiry cycles with root cause analysis that identifies which literacy practices are missing and then creates a tight and comprehensive plan around those practices. This creates a cohesive and specific plan that can target practices and have a chance of actually making an impact. | Duplicate comment. See response above. |
| 8 | Younglove | N/A | I am very impressed with Step 1 (See Direction and Purpose) outlined division of literacy goal levels: 0-5+, grades 2-3, 4-5, 6-8; 9-12. The concepts of Preschool Learning Foundations and Infant/Toddler Learning and Development Foundations (as well as English Learner aspects) are invaluable. I am very well aware that our present Governor and Assembly Speaker are very strong advocates of pre-school education. For anyone not trained to teach at the elementary level, it will take some time to understand the pre and early literacy in the Infant/Toddler Learning and Development and Preschool Learning Foundation dual cognition and Social-Emotional Standards (2105 adoption). The same is true with the invaluable Transitional Pre-K bridge between preschool and kindergarten (2010 adoption). What is key, however, is outreach to and inclusion of parent(s), guardian(s) [my addition], and families, via email, texting, phone, newsletter (multilingual, if possible), personal note and home visit, workshop, and school website. | Recommended. Information from the Infant and Preschool Foundations documents regarding parent and family engagement will be added to the Birth to Age Five Literacy Goals section. |
| 9 | Turkie | N/A | Glaring omission of MSLS and the integral work of Teacher-Librarians in supporting the curricular literacy needs of students. “The goals of the school library are for learners to teach use skills, resources, and tools to: (1) inquire, think critically, and gain knowledge, (2) draw conclusions, make informed decisions, apply knowledge to new situations, and create new knowledge (30 share knowledge and participate ethically and productively as members of our democratic society, and (4) pursue personal and aesthetic growth.” (American Association of School Librarians) | Not recommended. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 10 | DePole | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP, as evidence-based screening, when conducted during the early grades, has been shown to help identify students at risk of reading failure during the window of time most optimal for effective reading intervention. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills | Duplicate comment. See response above. |
| 11 | M. Potente | N/A | The CA Dyslexia Guidelines describe the instruction necessary for learning to read and write for the most disadvantaged students and should be recognized as central to first teaching, not as an extra resource. CA Dyslexia Guidelines deserve equal presence with the other guiding frameworks, consistently, throughout the SLP. | Not recommended. The *California Dyslexia Guidelines* are included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 12 | Hurd | N/A | This section lacks clear, concise guidance. It goes on and on without saying much and then provides references/links to the ELA/ELD Frameworks where specific content is detailed. The Foundational Skills sections of the Frameworks include direction that aligns with evidenced-based practices, but do teachers have the knowledge to teach these skills explicitly and systematically and if they are allowed to give them the time and attention their students need and deserve. | Not actionable. One of the purposes of the SLP is connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. |
| 13 | A. Potente | N/A | The CA Dyslexia Guidelines need to be named along with the ELA/ELD Framework as providing guidance for helping all students achieve CCSS ELA/Literacy” | Not actionable. The *California Dyslexia Guidelines* along with the Curriculum Frameworks are listed as Tier 1 resources in the Comprehensive and Integrated Literacy Model section, and this section notes that the model sets the direction for the SLP. |
| 14 | Fisher | N/A | The data and research shows the need for multi sensory structured and sequential literacy. Why oh why are we not prioritizing that in our direction and purpose? | Not actionable. |
| 15 | Aste | 44 | p.44 Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Not recommended. Language regarding the importance of embracing the home language and culture students bring as an asset appears in Step 3. The Comprehensive and Integrated Literacy Model includes the State Seal of Biliteracy, and it is noted in this section that the model sets the direction for the SLP. |
| 16 | Hernandez | N/A | Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. We have to prioritize the assets of racialized bilingual learners when designing literacy programs for equity. | Not recommended. Language regarding the importance of embracing the home language and culture students bring as an asset appears in Step 3. |
| 17 | Sapien | 44 | Page 44: Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Duplicate comment. See response above. |
| 18 | Schlagel | N/A | The stated goal “support all students to meet grade level literacy foundations…with fidelity…” does not provide clear direction. A plan would say “As of 2018-2019, 51.01 % of California’s students meet or exceed literacy standards. Without lowering standards, our goal is to increase student competency to 85% in 5 years by focusing on teacher training, setting curriculum standards for LEAs, and implementing criteria for LEA literacy consultants. This will allow the State to support all students…” Simply aggregating documents is not a plan. This document does not provide clear direction and purpose. This document could have established new guidelines and criteria for acceptable reading curriculum in California to ensure that regardless of residency, school districts adhere to the same criteria when selecting “high quality instructional material”. This was an opportunity for the State to set thresholds and criteria. | Not actionable. State guidance for curriculum and instruction is developed through a statutory process. |
| 19 | Peterson | 44 | Page 44 Set Direction and Purpose Add: “Recognize the value of building upon the assets of home languages that Dual Language Learners and English learners bring to school, especially during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy from an early age.” | Not recommended. Language regarding the importance of embracing the home language and culture students bring as an asset appears in Step 3. The Comprehensive and Integrated Literacy Model includes the State Seal of Biliteracy, and it is noted in this section that the model sets the direction for the SLP. |
| 20 | Mullenger | N/A | The CA Dyslexia Guidelines need to be named along with the ELA/ELD Framework as providing guidance for helping all students achieve CCSS ELA/Literacy. The CA Dyslexia Guidelines describe the instruction necessary for learning to read and write for the most disadvantaged students and should be recognized as central to first teaching, not as an extra resource. In the draft SLP, the CA Dyslexia Guidelines should not be designated as an “additional resource”, but should have equal presence alongside the ELA/ELD Framework. | Not actionable. The *California Dyslexia Guidelines* along with the Curriculum Frameworks are listed as Tier 1 resources in the Comprehensive and Integrated Literacy Model section, and this section notes that the model sets the direction for the SLP. |
| 21 | Williams | 44 | p. 44 - The goal of setting Direction and Purpose does not include the very things that Teacher Librarians and school libraries bring to a school site. Student engagement through programming (outside and in-class experiences), circulation of resources (books, online content, media), and instruction (information literacy, career exploration, media literacy, reading, and more) are where and how students practice the ideas that they learn in the classroom. | Not recommended. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 22 | Linden | N/A | Although the draft document states from the ELA/ELD Framework, "Children experience and thoughtfully engage with a range of high quality literary and informational texts. They comprehend and use increasingly varied vocabulary, grammatical structures, and discourse practices as they share with one another their understandings and ideas about texts and other learning experiences," there is no particular mention of the CA Model School Library Standards that provides the structure by which much of that interaction with literature takes place -- in and through the school library. The MSLS should be included alongside the other standards docs in this section. | Not recommended. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 23 | Onofre | N/A | Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Not recommended. Language regarding the importance of embracing the home language and culture students bring as an asset appears in Step 3. The Comprehensive and Integrated Literacy Model includes the State Seal of Biliteracy, and it is noted in this section that the model sets the direction for the SLP. |
| 24 | Mejia | N/A | Utilizing existing indicators of success on the California School Dashboard will support districts in focusing on early literacy initiatives. Ensuring the developmental task types from the ELPAC are included in preschools would support early literacy development. | Not actionable. |
| 25 | Spiegel Coleman | 44 | Page 44: Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Not recommended. Language regarding the importance of embracing the home language and culture students bring as an asset appears in Step 3. The Comprehensive and Integrated Literacy Model includes the State Seal of Biliteracy, and it is noted in this section that the model sets the direction for high-quality literacy programs and developing biliteracy whenever possible is addressed in the statewide literacy priorities. |
| 26 | Kaplansky | N/A | In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Not recommended. The Comprehensive and Integrated Literacy Model includes the State Seal of Biliteracy, and it is noted in this section that the model sets the |
| 27 | bloom | N/A | The CA Dyslexia Guidelines need to be named along with the ELA/ELD Framework as providing guidance for helping all students achieve CCSS ELA/Literacy” . | Not actionable. The *California Dyslexia Guidelines* along with the Curriculum Frameworks are listed as Tier 1 resources in the Comprehensive and Integrated Literacy Model section, and this section notes that the model sets the direction for the SLP. |
| 28 | Anderson | N/A | The Simple View of Reading should be clearly stated. The SLP Draft should reflect what is known about the science of reading, including Scarborough’s Reading Rope and the simple view of reading in order to accurately reflect literacy acquisition. | Not recommended. Activities supported by the CLSD grant will be evidence-based and aligned to state guidance and policies. |
| 29 | Petish | 44 | Page 44 Step 1: Set Direction and Purpose “State content standards and state curriculum frameworks define age/grade level goals for student achievement and instruction.” State content standards include the Model School Library Standards which provides guidance on developing high quality school library programs yet the MSLS are not listed anywhere in the SLP2 | Not recommended. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 30 | Sorensen | 44 | Page 44: Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Duplicate comment. See above for response. |
| 31 | Yu | N/A | Teacher librarians provide access to texts of increasing complexity as students work toward independence. Part of becoming an independent readers is learning to choose the right text for the purpose and task. Teacher librarians are trained to facilitate this learning. Teacher librarians provide access to high-quality digital and print texts and work to build a community of readers at their schools. They work beyond the individual classroom to the benefit of the entire school community. | Not actionable. |
| 32 | Hatcher Day | N/A | Is there a way we can recognize the value and assets of home languages students bring to preschool and school during the early years? All students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 section can we add something about the potential for demonstrating the attainment of proficiency and literacy in English and another language for the State Seal of Biliteracy? | Duplicate comment. See above for response. |
| 33 | McMillan | N/A | Teacher librarians provide access to texts of increasing complexity as students work toward independence. Part of becoming an independent readers is learning to choose the right text for the purpose and task. Teacher librarians are trained to facilitate this learning. Teacher librarians provide access to high-quality digital and print texts and work to build a community of readers at their schools. They work beyond the individual classroom to the benefit of the entire school community. | Not actionable. |
| 34 | Sedgwick | N/A | Is there a way we can recognize the value and assets of home languages students bring to preschool and school during the early years? All students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 section can we add something about the potential for demonstrating the attainment of proficiency and literacy in English and another language for the State Seal of Biliteracy? | Duplicate comment. See above for response. |
| 35 | Raygoza | 44 | Page 44 - Introduction of Step 1 - add language that recognizes the value of building upon the assets of home languages that Dual Language and English learners bring to school in the early years. Grades 6th-12th section - highlight the possibility of earning the State Seal of Biliteracy as a senior. Global 2030 can be referenced. | Duplicate comment. See above for response. |
| 36 | Iturralde | N/A | It is critical to include CA Dyslexia Guidelines as a guiding framework alongside the ELA/ELD framework for core instruction. Practices that support our readers with dyslexia have important benefits for all readers, and especially for other vulnerable readers such as English learners. It is a mistake to include dyslexia considerations as an additional resource when these practices would improve instruction for all students. | Duplicate comment. See above for response. |
| 37 | Hernandez | 44 | Page 44: Within the introduction of Step 1, we suggest adding language that recognizes the value of building upon the assets of home languages that Dual Language and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language, enabling students to receive the State Seal of Biliteracy as graduating seniors. One of the goals of Global California 2030 is an increasing number of seniors qualifying for the State Seal of Biliteracy and including that reference would fit in this section. | Duplicate comment. See above for response. |
| 38 | Ramos Harris | N/A | Birth to Age Five Literacy Goals: ● Can we add NASEM3 report as a resource and importance of the first 5 years to continue development of home language alongside second language acquisition? The plan can also emphasize the importance of oral language specifically for young DLL children. Also, important to not just mention Preschool, but the whole birth to five range of ECE and learning/development. | Not recommended. Resources included in the SLP are state guidance and policies. Additional resources may be added to the Resource Repository noted in the Step 3. Infant/toddler guidance is noted in the SLP. |
| 39 | Merritt | N/A | Not seeing any reference to biliteracy do the frameworks being used make reference to biliteracy? | Not actionable. Biliteracy is addressed in the Comprehensive and Integrated Literacy Model, which sets the direction for high-quality literacy programs. Biliteracy is noted in the statewide literacy priorities in Step 3. |
| 40 | McNamara | 44 | p 44 Broaden the concept of literacy to information literacy encompassing digital literacy, medial literacy, and more as well as reading literacy. Information literacy includes ability to find, evaluate, process, and effectively use information. Also, include: teacher librarian works with students and teachers to support and improve all literacies. A literacy plan omitting teacher librarians and libraries is not a plan for literacy at all. | Not recommended. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 41 | Tran | 44 | Page 44 Add language that recognizes the value of building upon the assets of home languages that Dual Language Learners and English learners bring to preschool and school during the early years. When honored and enhanced, all students have the ability to learn multiple languages and develop biliteracy proficiency at an early age. In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Duplicate comment. See response above. |
| 42 | Sheppard | N/A | This section seems to focus mainly on a narrow definition of literacy. Expand the definition to a minimum information literacy: the ability “to recognize when information is needed and have the ability to locate, evaluate, and use effectively the needed information” (American Library Association ). The American Association of School Librarians (AASL) Stadnards define information literacy "is knowing when and why information is needed, where to find it, and how to evaluate, use, and communite it in an ethical manner (Chartered Institute of Library and Inforamtion Professionals 2004)." Literacy has evolved. Literacy constitutes a pillar of education. Literacy is not an intuitive skill. It requires conscious and deliberate learning and practice. Teacher Librarians are certifcated information professionals that have not only the expertise but are uniquely positioned to teach information and digital literacies across the academic curriculum, independently and collaboratively with the rest o | Not recommended. *The California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 43 | Tompkins | N/A | While I appreciate the overview of what students would be doing at various grades and ages, what do you do when your student isn't able to perform these skills? I have heard teacher after teacher share their concern when they have a student in Junior High that cant read. How do general education teachers identify the students in grades 3 - 12 that struggle to read, and how are their deficits identified? There is also a lack of understanding of what Dyslexia and teachers are left to decide on their own what they think is appropriate. There should be a statewide common understanding of the Dyslexia Guidelines and how to quickly identify a struggling student. | Not actionable. The *California Dyslexia Guidelines* along with the Curriculum Frameworks are listed as Tier 1 resources in the Comprehensive and Integrated Literacy Model section, and this section notes that the model sets the direction for the SLP. |
| 44 | Hamrick | N/A | Meaning Making mentions "research." It's actually a major part of the CCSS. How do we not mention Model School Library Standards. "Foundational Skills" and "automaticity," along with "experiencing diverse works", assumes access to enriching literature and various media, and "broad" experience with all. The emphasis on "literacy instruction" and "dual integration" would benefit from suggestion that Teacher Librarians are experts and available to implement programs, teach students, and train teachers. In the discussion of early education, let's have some mention of developmentally appropriate materials and methods, and professionals on sites, such as a teacher librarian, to coordinate literacy support. Invoke American Academy of Pediatrics recommendations for early reading experiences, screen time recommendations, developmentally appropriate experiences. | Not recommended. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 45 | Budz | N/A | In supporting Best First Instruction, it should be emphasized, as has been shown in research, that intervening early is key to reading success. First grade needs to be highlighted as the year when 1:1 or small group intensive intervention needs to take place for struggling at-risk readers after a child has had one or two years of literacy in TK and/or K. | Not recommended. Early intervention is mentioned in Step 3. |
| 46 | Hohls | 44–48 | P44-48 The definition of Literacy is far too narrow. At a minimum, it should be expanded to include Information Literacy: the ability "to recognize when information is needed and have the ability to locate, evaluate, and use effectively the needed information." This definition is taken from the American Library Association and is a fundamental part of the design for the Model School Library Standards. The ability to simply reading and comprehend print and online materials is not sufficient to be considered literate in the 21st Century. Students will need to know how to access, evaluate, use, and integrate the vast quantity of information in the future. | Not recommended. The *California Model School Library Standard*s will be included in the Comprehensive and Integrated Literacy Model, which, in addition to the *CCSS for ELA/Literacy* and the *ELA/ELD Framework*, set the direction for literacy programs statewide. |
| 47 | White | N/A | For substantive and lasting change to occur, teachers need more than a laundry list of “things” to throw into their routine. The State Literacy Plan is "big " (i.e., contains plethora of pieces/ideas related to literacy), but it is not comprehensive because it is left up to those who use it to “connect the dots.” The extensive lists are not integrated so that the ideas might be useful to teachers for informing the planning of their instruction. Teachers need to understand English language structure with the depth and detail necessary to explain concepts to their students. They need to know WHY one type of instruction may be more effective than another—and for whom. Understanding instructional rationales provides teachers with information for making the instructional decisions they need to make every day with every student—as well as to make adjustments to instruction based on their observations of the students they teach. | Not recommended. The SLP details the continuous improvement process used at the state level to leverage CLSD grant funds to address identified needs. These state-level activities will support schools to implement evidence-based strategies to address statewide literacy priorities. |
| 48 | Bishop | N/A | Too narrow of a definition of literacy. Include Information Literacy to make literacy broader.Information Literacy is the ability “to recognize when information is needed and have the ability to locate, evaluate, and use effectively the needed information” (American Library Association ). | Not recommended. Language from the *California* *World Language Standards* will be added to the Comprehensive and Integrated Literacy section regarding the different literacies students acquire. |
| 49 | Gustafson Corea | N/A | SLP Continuous Improvement Process: Step 1: Set Direction and Purpose In the Grade Six through 12 Section, it would be good to reference the potential for demonstrating the attainment of proficiency and literacy in English and another language enabling students to receive the State Seal of Biliteracy as graduating seniors. | Duplicate comment. See response above. |

## Table 5: SLP Continuous Improvement Process – Step 2: Assess Local Needs and Determine Causal Factors Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Velasco | N/A | Guidance needs to be provided/recommended to LEA's on other appropriate assessments. It is too late to use CAASPP as the only indicator that student has "failed" or scored well below grade level. How do we support LEA's to use other sumative and formative assessment to provide feedback. | Recommended. The California Assessment of Student Performance and Progress (CAASPP) results are presented in this section to evaluate educational programs statewide. More information regarding different assessment types is provided in the Assessment System section within the Comprehensive and Integrated Literacy section. More information will be added to the Local Level box in this section regarding other assessment types that should be used throughout the school year. |
| 2 | Foster | N/A | It’s great that the CA dyslexia guidelines are mentioned, but teachers have mostly never heard of this and know nothing about SLD in reading/dyslexia. All teachers must be trained in this! | Not actionable. This section provides information and analysis of current student achievement data and the results of the Comprehensive Statewide Literacy Needs Assessment. Building school capacity to support students struggling with reading, including, but not limited to, students with disabilities and students with dyslexia has been established in the SLP as a statewide literacy priority for transitional kindergarten through grade five. Statewide activities to address this priority will be aligned to the *California Dyslexia Guidelines*. |
| 3 | Ballestros | N/A | Appreciate the support of the State to provide the Comprehensive Statewide Literacy Needs Assessment to help determine what local literacy programs would best serve families, children and educators. | Not actionable. |
| 4 | Schneider | 57 | As noted above, the direction and purpose cannot be properly set without awareness of and attention to the vital role of school libraries in developing, supporting student literacy, the CA Model State Library Standards, and especially the extensive body of (replicated) research showing the impact of certificated library staff on students' literacy achievement, regardless of student/community SES. This is a glaring omission in the SLP. All elements of literacy development, from phonemes to meaning making, are vitally important, but this SLP pays attention to only some of those elements (those involved in "instruction, intervention" but not those involved in "motivation, encouragement, practice, support, engagement," etc.) p57 I challenge the claim of "comprehensive" and "stakeholder engagement" when only 1 teacher-librarian was part of the team that created this plan and no attention to school libraries is in the draft plan. This glaring omission must be addressed. | Not actionable. This section provides information and analysis of current student achievement data and the results of the Comprehensive Statewide Literacy Needs Assessment. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP, which sets the direction for literacy programs statewide. |
| 5 | Lane | 57 | I'm wondering if there were any Teacher Librarians, either from schools, the district offices, and/or County Offices included in the stakeholder group. I noticed there was one teacher librarian on the development team, yet there is NO mention of school libraries and the researched-based effectiveness of a strong school library program. This section addresses the four ELA claims (p. 57): Reading: “Students can read closely and analytically to comprehend a range of increasingly complex literary and informational texts.” Listening: “Students can employ effective speaking and listening skills for a range of purposes and audiences.” Research: “Students can engage in research/inquiry to investigate topics, and to analyze, integrate, and present information.” Writing: “Students can produce effective writing for a range of purposes and audiences.” Teacher Librarians, in collaboration with classroom teachers, directly impact these claims via the school library materials, teaching, and sup | Not actionable. This section provides information and analysis of current student achievement data and the results of the Comprehensive Statewide Literacy Needs Assessment. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide. |
| 6 | Houghton | N/A | Students can not successfully "read closely and analytically to comprehend a range of increasingly complex literary and informational texts" when limited to the reading of their classroom textbook. Access to age appropriate high quality reading materials across the curriculum is necessary. These are the materials found in a model school library. Certificated Librarians are uniquely trained to help students engage in research/inquiry across subject areas.Collaboration between content area teachers and certificated teach librarians is the most effective way to teach this domain. | Not actionable. This section provides information and analysis of current student achievement data and the results of the Comprehensive Statewide Literacy Needs Assessment. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide. |
| 7 | Archon | N/A | The data in this section shows that literacy scores are not meeting acceptable targets in the state specifically for our most under served subgroups. As we work to improve these numbers what access due these students have to quality reading materials? If we are going to collect data I think it would be important to collect data on how much access these students have to quality resources in their schools. Do English language learners have print and media access to books that reflect their culture? Their history> What about students of color? Are there books about students with disabilities in the library collection? Are any of the authors of the books in the library collection written by people with disabilities so that these students can envision themselves as writers? | Recommended. A Local Level box will be added to the Additional Relevant Data subheading in this section to encourage LEAs to gather local data on access to school libraries, Teacher Librarians, and other relevant data beyond the California School Dashboard. |
| 8 | McKeeman Rice | N/A | I would like to see a functional plan. This language speaks in generalities. States and schools that have made significant progress have completed inquiry cycles with root cause analysis that identifies which literacy practices are missing and then creates a tight and comprehensive plan around those practices. This creates a cohesive and specific plan that can target practices and have a chance of actually making an impact. | Not actionable. Duplicate comment. See response above. |
| 9 | Younglove | N/A | The Step 2 assessment of local needs is super important, in order to determine both what is in place—and what is (still) needed. Attention to California’s very diverse demographic breakdowns will be crucial, for targeting instruction. Linking the Multi(3)-Tiered System of Support to district Local Control and Accountability Plans, with three year outcome projections (short, middle, and long-term) is a “good fit” (i.e., “doable”). Dashboard multiple measures, with six state and four local indicators, provide a wealth of information about just how well individual schools “are being run.” | Not actionable. |
| 10 | Murphy-Shaw | N/A | Large regional projects may not fall under the same "needs" assessments. Will the procedures for the funded projects allow statewide, not just regional collaborations to address the varied needs identified? I was looking for guidance of this sort and see intent, but the rest may be in application. | Not actionable. The Local Literacy Lead Agencies grant will focus on the statewide literacy priorities identified in the SLP and grantees will be required to build expertise in and implement the strategy with one or more local school districts. |
| 10 | Turkie | N/A | The data provided around assessments specifically addresses the domain specific area of research/inquiry on CAASPP tests.The only teachers certificated to teach Information literacy within the state of California as explained by CDE are Teacher-Librarians (TLs). The fundamental roles of school library programs and Teacher-Librarians are missing. | Not actionable. |
| 11 | Turkie | N/A | The data provided around assessments specifically addresses the domain specific area of research/inquiry on CAASPP tests.The only teachers certificated to teach Information literacy within the state of California as explained by CDE are Teacher-Librarians (TLs). The fundamental roles of school library programs and Teacher-Librarians are missing. | Not actionable. |
| 12 | Fisher | N/A | How can you assess local needs without universal screening? | Not actionable. |
| 13 | Hurd | N/A | Few educators in my district and nearby ones know enough about the Foundational Skills, how to assess them, and how to provide explicit systematic instruction in them to adequately do a needs assessment in this area. Better implementation of universal screening and understanding about what to do with the results is needed, which aligns with Key Topic B comments. I agree about the current curriculum not aligning with the California Dyslexia Guidelines and that more professional learning about its contents are needed. The CAASPP ELA/Literacy by Domain data shared in the report should include both below standard and standard nearly met levels (layered one on top of the other) to give the real picture. This would set an appropriate example to LEAs for how they too should look at their data to assess their needs and determine causal factors. | Recommended. The CAASPP ELA/Literacy domain results will be updated to include “Near Standard” and “Below Standard” results. |
| 14 | Aste | 57 | p.57 Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiently addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Recommended. The Additional Relevant Data section will be revised to replace “English learner progress” with “English language proficiency growth.” |
| 15 | Sapien | 57 | Page 57: Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiently addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Recommended. The Additional Relevant Data section will be revised to replace “English learner progress” with “English language proficiency growth.” |
| 16 | Schlagel | N/A | The charts may be better suited for Step 1 to establish where the State is currently. “Analyzing Assessment…” title should be changed. “Evaluate Education Programs” is enough. A “minimum” criteria to evaluate the program should follow. This criteria should include materials that reflect the diversity of the State population as a whole. There are 977 school districts in California, more than 306,000 teachers (190,012 are white, 63,380 are Latino, and 11,918 are black), 26,861 school administrators. 167 districts were sampled. Diversity in curriculum material will not change if the State does not develop criteria. African Americans, special needs communities, and other underserved populations have no voice at the local level in many districts. Minority and special needs communities need representation in this process. There is nothing to ensure these communities have a voice in the process. As currently written, this document perpetuates existing problems including lack of diversity | Not recommended. The title “Analyzing Assessment of Learning to Evaluate Education Programs” is intended to clarify how the CAASPP data is being used in the context of the SLP. The minimum criteria are set in Step 1, that all students to meet age/grade level literacy foundations and content standards and all LEAs implement state literacy guidance with fidelity by the conclusion of the CLSD Grant. |
| 17 | Peterson | 47 | Page 47 Grades Six - Twelve Students have the opportunity to demonstrate attainment of literacy and proficiency in English and another language and earn the State Seal of Biliteracy as graduating seniors. | Duplicate comment. See response above. |
| 18 | Williams | 48 | p.48 - The Team adds only one Teacher Librarian. There needs to be more representation from this vital school venue. | Not actionable. |
| 19 | Linden | N/A | As school library programs vary widely throughout California's counties and districts, a guide to evaluating school library programs and services should be mentioned in this document in order to guide LEAs and schools. The Model School Library Standards should be a component of each district’s development of a local literacy strategy. Certainly in this section, school libraries should be included in order to promote fair and equitable resources be available to students across the state, no matter the county, district, or neighborhood. In the section detailing the State Literacy Team: How could there be a "State Literacy Team" to "address state literacy needs" that does not include a credentialed teacher librarian or paraprofessional school library staff member who work with students toward building literacy on a daily basis? | Not actionable. This section provides information and analysis of current student achievement data and the results of the needs assessment. |
| 20 | Onofre | N/A | Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiently addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Duplicate comment. See response above. |
| 21 | Mejia | N/A | This is a set and practiced course and an appropriate use of resources to ensure success. | Not actionable. |
| 22 | Spiegel Coleman | 57 | Page 57: Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiently addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Duplicate comment. See response above. |
| 23 | Petish | N/A | To adequately do a needs assessment in this area, our educators need more knowledge about the role of foundational skills, how to assess them, and how to provide explicit systematic instruction in them. What about better implementation? Screenings? Current curriculum does not align with the California Dyslexia Guidelines and more professional learning about their contents is needed. The CAASPP ELA/Literacy by Domain data shared in the report should include both below standard and standard nearly met levels (layered one on top of the other) to give the real picture. This would set an appropriate example to LEAs for how they too should look at their data to assess their needs and determine causal factors. | Recommended. The CAASPP ELA/Literacy domain results will be updated to include “Near Standard” and “Below Standard” results. |
| 24 | Sorensen | N/A | data for CAASPP: it is confusing to compare overall data with its four levels on the same chart as the claim level data with it's three levels. Better to show distribution of performance levels for the claim level data as "near standard" includes students who are standard... and some that are slightly below on a separate chart keep reference to multiple measures that affect literacy outcomes charts of survey response are helpful in clarifying how educator needs were identified and prioritized | Recommended. The CAASPP ELA/Literacy domain results will be updated to include “Near Standard” and “Below Standard” results. |
| 25 | Lockwood | 51–56 | Page 51-56 California Assessment of Student Performance and Progress. The effective teacher librarian works collaboratively with classroom teachers to develop and implement standards-based learning experiences for diverse student populations; selects, organizes, manages, and promotes the use of learning resources in all formats; and instructs students and staff in the critical evaluation, appropriate access, and effective use of information. Source: Fresno Pacific University Teacher Librarian Credential Program. | Not actionable. |
| 26 | Wong | 57 | Page 57: Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiently addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Duplicate comment. See response above. |
| 27 | McMillan | N/A | Teacher librarians are poised to directly support teachers in "Key Topic A: Engaged Leadership and Supporting Teachers to Improve Instruction." Teacher librarians are in-house experts on literacy and research skills. They should be explicitly named as in-house supports for professional learning as well as student literacy intervention. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide, and state guidance regarding school libraries and teacher librarians will be added throughout the plan as appropriate. |
| 28 | Sedgwick | N/A | Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. Can we be even more specific? English Language Proficiency growth as reported in the English Language Proficiency Indicator. According to the charts and surveys, the needs of English learners are highlighted as not being sufficiently addressed. We need to have each statement lead to specific and intentional priorities in the following sections of the plan. | Duplicate comment. See response above. |
| 29 | Raygoza | 57 | Page 57 - Additional Relevant Data - important to look at the data for Redesignated Fluent English Proficient students. | Duplicate comment. See response above. |
| 30 | Hernandez | 57 | Page 57: Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. Districts should review their ELPAC data by years in the program to determine which students need additional language development support. There is clear research that connects the degree of English language proficiency with academic achievement and literacy. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiency addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Duplicate comment. See response above. |
| 31a | Ramos Harris | 49, 57 | Data and Assessment ● The process of the SLP is to be based on data that districts can review, but LEAs currently do not have nuanced data for early childhood. Pg.57 points to the Dashboard, which does not provide substantive data for the youngest children. This lack of data that will form the basis of planning needs to be highlighted. We need to meaningfully identify DLLs in partnership with families, and connect educators with supports to design culturally and linguistically responsive early learning settings that will support development of biliteracy/bilingualism. ● Not only do we need observational assessments that are age- and developmentally appropriate in multiple home languages, but also invest in local capacity to collect data with assessors that are culturally and linguistically competent. Pg.49 DRDP | Recommended. Language will be added to the Additional Relevant Data section to include early learning data. |
| 31b | Ramos Harris (continued) | 49, 57 | ● Would be important for the Plan to include the ELD section of the DRDP.. ● pg 49 states: “These skills can be demonstrated in any language and in any mode of communication. Language and literacy skills in a child’s first language” Would be important to guide educators on “the how” of this critical point. The document should show educators how they can support home languages of young children. Pg.57 In additional relevant data, it would be critical to include other data that assess bilingual/dual language learners’ progress. We are doing ELs and biliteracy development for ELs a huge disservice if we continue to examine EL performance, especially in 3rd grade, by examining ELA results. These are only meaningful for ELs at the highest proficiency level and/or for RFEPs. | Duplicate comment. See response above. |
| 32 | Martinez | 51–56 | The CASPP section (pp. 51-56) is highly problematic, as is this summary statement that appears after the grade 3, 5, 8 and 11 results: "Across the domains, the student groups with the highest percentages of students not meeting the grade level standard are English learners, students with disabilities, and Black/African American students." English Learners by definition should not be meeting standard on the ELA test. This is not a valid comparison of student groups. This is why we need training on interpreting assessment data for ELs/DLLs. On p. 56, the plan states, "In a Multi-Tiered System of Support, Tier 1 instruction should result in no less than 80 percent of students achieving grade-level expectations. If less than 80 percent succeed in Tier 1 instruction, schools should engage in close examination of the curriculum and teaching practices and make appropriate adjustments." However, this should not be the expectation if we are using ELA assessment data to examine EL performance t | Recommended. The Additional Relevant Data section will be revised to replace “English learner progress” with “English language proficiency growth.” |
| 33 | Merritt | N/A | Desired Results Developmental Profile: could biliteracy be included for children for whom it is possible? Could it be an aspirational result? Only CAASP data is included -- what about Spanish language version -- and other literacy assessments used statewide for bilingual/biliterate students? | Recommended. More data sources will be added to the Additional Relevant Data section, including biliteracy data sources. |
| 34 | McNamara | 57 | Teacher librarians play a critical role in balanced literacy. Not realizing the role of the teacher librarian has erased. p. 57 Plan did not take stakeholders into account. Only one teacher librarian was able to serve on the team. Her comments and concerns on broadening literacy as well as others' was not taken into account. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide, and state guidance regarding school libraries and teacher librarians will be added throughout the plan as appropriate. |
| 35 | Tran | 57 | Page 57 Under Additional Relevant Data, it would be important to look at ELA data for Reclassified Fluent English Proficient students to determine if they continue to make progress toward proficient levels of literacy. The additional measures listed “English Learner Progress” would be better to be referenced as English Language Proficiency growth as reported in the English Language Proficiency Indicator. In the data charts and results from the surveys, the needs of English learners are highlighted as not being sufficiently addressed. Each of the statements should lead to specific and intentional priorities in the following sections of the plan. The need to tie the results of the needs assessment to the plan is important. | Duplicate comment. See response above. |
| 36 | Sheppard | 57 | As noted previously, direction cannot be set without awareness of and attention to the vital role of a Teacher Librarian in a school community in developing and promotion all literacies. The CA Model School Library Standards and the extensive body of research showing the strong correlation and impact of certificated Teacher Librarians on students' academic achievement and literacy regardless of both student and community SES. This omission is troubling for California students! It seems that the definition of literacy is lacking. I'm not reading about motivation, encouragement, practice support or engagement for example. p57 I am challenging the claim of "comprehensive" when only one Teacher Librarian was part of this team working to create this plan and that the MSLS are not addressed in the discussion or referenced. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide, and state guidance regarding school libraries and teacher librarians will be added throughout the plan as appropriate. |
| 37 | Rivera | N/A | I noticed that the data called out in this section is from preschool assessments and then jumps to CAASPP. I really feel that there is a statewide gap in understanding of how to read literacy data in K-2 and respond to that data appropriately. This gap is exacerbated by the myriad of reading intervention programs that LEAs purchase on top of their adopted ELA product. We have a lot of data that people don't know how to read or respond to appropriately. | Not actionable. While assessment literacy was not identified as a statewide literacy priority, guidance is available in the *ELA/ELD Framework* and the Resource Repository described in Step 3 will include assessment literacy resources. |
| 38 | Tompkins | N/A | I appreciate the look into CAASPP data, but these tests do NOT identify basic deficits in literacy. These tests are used by districts to deny that a student is struggling because they may have borderline scores. If you want appropriate literacy data, use a Universal Literacy screener so you can truly develop a literacy profile for each student... can a student decode words, can they sound out pseudowords, can they blend sounds, phonemic awareness, grapheme knowledge, etc. I am truly tired of looking at State Assessments that are just smoke and mirrors... they look pretty but don't have any real data to help teachers and parents understand where the actual literacy break down is occurring. My son was passed through each grade and couldn't effectively read. He was in 6th grade and decoding words at a first-grade level and the school said he was faking it. We need standard and reliable data to avoid these kinds of issues. | Not actionable. Universal screening is promoted in Step 3 of the SLP and in the *ELA/ELD Framework*. |
| 39 | Hamrick | N/A | ⦁ "What are the implementation considerations for each evidence-based strategy prioritized by the SLT? ⦁ What resources should LEAs consider using when implementing these evidence-based strategies?" Teacher Librarians are in a good position to help coordinate efforts on site | Not actionable. |
| 40 | Budz | N/A | While CAASPP is one indicator of student achievement in literacy, and other types are mentioned generally, there seems to be a need for other specific literacy assessments that diagnose and track developmental reading progress starting in TK. There is a lack of consistent literacy screening as shown from the survey, so this is a need for the SLP. | Not actionable. Universal screening is promoted in Step 3 of the SLP and in the *ELA/ELD Framework*. |
| 41 | Hohls | 48–62 | P48-62 Data used here should include school library staffing levels, budgets, other literacy access and equity factors such as availability of books. Are students living in "book deserts?" Are local community needs being met by other literacy partners? Are those relationships sustainable? A larger sample and variety of data should be included. | Recommended. Other data sources, including access to libraries and teacher librarians, will be added to the Additional Relevant Data section. |
| 42 | White | N/A | (CONTINUED FROM ABOVE): Depth of understanding of BOTH instructional content (WHAT to teach) AND principles of instruction (HOW to teach) will be essential. The more teachers understand (both content and principles of instruction) the happier they are because they feel confident of their competence to teach their students to become independent readers and writers...which is why they work so hard every single day. Just as with the kids, when all that time and effort reaps tangible benefits, they are motivated to work even harder and longer. Teachers confident of their competence to do their jobs well do not leave the teaching profession! | Not actionable. |
| 43 | Bishop | N/A | Where is the fundamental role of the Teacher Librarian? | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model of the SLP which sets the direction for literacy programs statewide, and state guidance regarding school libraries and teacher librarians will be added throughout the plan as appropriate. |
| 44 | Gustafson Corea | N/A | SLP Continuous Improvement Process: Step 2: Assess Local Needs and Determine Causal Factors ELA data for Reclassified Fluent English Proficient students should be included in the “Additional Relevant Data” in order to determine if RFEP students continue to make progress toward proficient levels of literacy. | Duplicate comment. See response above. |

## Table 6: SLP Continuous Improvement Process – Step 3: Plan for Improvement Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Ballesteros | N/A | Plan for improvement is well outlined by including alignment with local needs district context, setting achievable milestones, actions, the outcomes and outputs and setting a timeline. | Not actionable. |
| 2 | Schneider | 62, 67, 80, 82 | For a document repeating the mantra of "evidence-based" programs and interventions, the committee has ignored a large body of studies showing the value of certificated library staff on the literacy achievement of students, in both high and low SES schools. This must be taken into consideration for "plans for improvement" in our children's literacy performance. p62 "support literacy-rich environments" but ignore the one that can provide equitable access to every student (and their parents!) in a school: the library. p67 school libraries provide materials for children and parents with multiple languages p80 Tchr-Lib are THE expert on disciplinary literacy for adolescent learners, supporting teachers AND students p82 Culturally responsive teacher and attention to students' social and emotional lives is done every time library staff match a book and a student, something that takes place dozens of times each day in a library | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 3 | Lane | N/A | Plans for Improvement must include the school library with credentialed Teacher Librarians. "More than 60 research studies throughout the nation, from Alaska to North Carolina to California, have shown that students in schools with good school libraries learn more, get better grades, and score higher on standardized tests than their peers in schools without libraries. " Anon (2020). Retrieved 2 October 2020, from https://www.cde.ca.gov/BE/st/ss/documents/ Title: Model School Library Standards for California Public Schools (Introduction) Publisher: CDE Press Sacramento, CA Copyright Date: 2010 | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 4 | Houghton | N/A | The only way to provide literacy-rich environments equitably is through school libraries. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 5 | Archon | 81 | In this section it is mentioned that there should be "Literacy-Rich Environments and Experiences" - some of the best and most likely places for this to occur are in school libraries. There is no mention of this in the plan. Students must have opportunities to read engaging text on subjects that interest them, that are not a part of the curriculum. The need a qualified teacher's guidance in finding these resources. I suggest a school library program and a school librarian. This section also addresses the needs of students with special needs. One of the safest and most nurturing place for students with special needs is the school library with a nurturing and experience library team to help these students find resources that interest them. On page 81 many of the adopted state standards are mentioned but the Model School Library Standards are again omitted. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 6 | McKeeman Rice | N/A | I would like to see a functional plan. This language speaks in generalities. States and schools that have made significant progress have completed inquiry cycles with root cause analysis that identifies which literacy practices are missing and then creates a tight and comprehensive plan around those practices. This creates a cohesive and specific plan that can target practices and have a chance of actually making an impact. | Duplicate comment. See response above. |
| 7 | Younglove | N/A | The Step 3 plan for improvement seems provident, considering that planned pre-K to age 5+ segments must be invoked and expanded greatly. As a language arts teacher for nearly six decades, I cannot stress enough those Tier 1 foundational skills of/for reading/writing—from phonological awareness (un)to/en route to knowledge itself. Somehow, for the students’ sakes, we have to find (more/better) ways of moving toward universal designs for learning in order to make those Individualized Education Programs (most) meaningful. When neurobiological needs overlap with English learning needs, it is a double whammy for learner and teacher alike. While accommodations can help a great deal, fostering interdisciplinary literacy can be(come) key. I believe that grant monies can help further train teachers in the essences of their own disciplines; that Frameworks contain valuable information about lesson approaches themselves. | Not actionable. |
| 8 | Turkie | N/A | It is inconceivable that you can have a section titled “Literacy-Rich Environments and Experiences” that does not include a conversation about the vibrant, stimulating, safe, and resource-rich learning environments of a school library. School libraries provide vital programming to students and families. They are safe spaces for students who feel marginalized on campuses, and they reflect the literacy commitment of the school. They provide service to every single student at a site - dyslexic, SPED, and EL included. The need for high quality PD is pervasive in this section - from UDL to small group instruction. Explicit language that calls on the training being offered to Teacher-Librarians as well as teachers is needed. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 9 | Vang | N/A | This section lacked coherence across the grade levels. Resources were identified and highlighted with general guidelines. Some strategies were evident in some grade segment. but not others. Explicitly identify the evidence-based strategies that can be used for each grade segment.   This section also needs visuals or sample plans to show how the resources in each grade level segments that clearly identifies and aligns the needs, implementation considerations (evidence-based strategies), resources. | Not recommended. Guidance and resources provided in the Comprehensive and Integrated Literacy Model section support quality literacy programs across grade levels. The state guidance and resources referenced in this section will be leveraged to address statewide literacy priorities. |
| 10 | DePole | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP, as evidence-based screening, when conducted during the early grades, has been shown to help identify students at risk of reading failure during the window of time most optimal for effective reading intervention. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills | Duplicate comment. See response above. |
| 11 | M. Potente | N/A | Structured Literacy needs to be named and prioritized. It is largely absent, even though of instruction is critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP. Details about the diagnostics involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills. Foundational skills receive some attention in the SLP, but LEAs would benefit from clearer explanation. Coherent guidance based on evidence-based models of reading development, including Scarborough’s Reading Rope and the simple view of reading should be included in the SLP. | Duplicate comment. See response above. |
| 12 | Hurd | N/A | This was the most encouraging part of the plan, in that the Tier 1 Instruction in Foundational Skills, Reading, and Writing section was organized around the 5 components of reading. This is the direction I was looking for in the comprehensive model and in Step 1: Set Direction and Purpose. Models such as the Simple View of Reading and Scarborough’s Reading Rope would convey the needed integration of these components rather than them being represented as separate pillars. In the subsection on phonics I would suggest including the term “orthographic mapping” in the second paragraph. | Not recommended. CLSD activities will be aligned to state guidance documents, including, but not limited to the *ELA/ELD Framework* and the *California Dyslexia Guidelines*. |
| 13 | A. Potente | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills. Foundational skills receive some attention in the SLP, but LEAs need clearer explanation of how to teach them explicitly and sequentially. Coherent guidance based on evidence-based models of reading development, | Duplicate comment. See response above. |
| 14 | Aste | 69–79 | p. 69 - 79 Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development p.69 The first bullet should be replaced with: Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. p.76 - 78 There are many types of disabilities connected to reading and learning disabilities. This plan needs to be balanced and include other examples. Dyslexia should not be singled out in the title but be a subsection on a Language Processing and Disabilities Section. p.79 For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Not recommended. The statewide literacy priorities include building capacity for teaching foundational skills and supporting students with dyslexia because these were identified as statewide needs and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 15 | Sapien | 69–79 | Pages 69-79: Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development Page 69: The first bullet should be replaced with: Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. Page 76-78: There are many types of disabilities connected to reading and learning disabilities. This plan needs to be balanced and include other examples. Dyslexia should not be singled out in the title but be a subsection on a Language Processing and Disabilities Section. Page 79: For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Duplicate comment. See response above. |
| 16 | Schlagel | N/A | FREE PRESCHOOL FOR ALL is essential to California closing the equity gap in education. Teaching structured literacy to all public and private school preschool teachers should be a priority. Developing an approved curriculum list requiring districts to select from it so that all student receive structured literacy as “high quality first instruction” is essential to improving CA. The stakeholder engagement survey respondents suggest onsite literacy teams, lack of onsite knowledge about literacy, lack of assessment understanding, inconsistent use of universal screeners, curriculum that doesn’t meet ELD and dyslexia guidelines, and difficulty with community engagement are some of the necessary components for improvement but NONE of these are addressed in this plan. The LEA’s openly admit they need expertise and training. We need a SLP that helps them. | Not recommended. The statewide literacy priorities identified in this section include building capacity for supporting students who are struggling with reading and professional learning systems. Structured literacy is also addressed in this section. |
| 17 | Mullenger | N/A | More emphasis and explicit guidance needs to be given related to Structured Literacy, Universal Screening, and evidence-based models of reading development in this section. Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. Foundational skills receive some attention in the SLP, but LEAs need clearer explanation of how to teach them explicitly and sequentially. Coherent guidance based on evidence-based models of reading development, including Scarborough’s Reading Rope and the simple view of reading should be included in the SLP. | Duplicate comment. See response above. |
| 18 | Williams | 55, 62, 63, 82 | p.55 etc. Many charts show the information literacy 'below level' results are quite high. The solution? Teacher librarians in an instructional, collaborative partnership with their classroom colleagues. p.62: "support literacy rich environments" - site library Teams bring the largest collection of audio and visual resources to the entire school and instruct in their use as well as sharing possibilities. p. 62-63 - increasing toddler and early learner supports / reaching out to parents - Teacher librarians collaborate with their public library partners to provide out-of-school support and resources that exist beyond the scope of the school program. This is a partnership - not a supplement- that expands the scope of service to all students and their families. p. 82: culturally responsive instruction is benefitted by a wide support with effective materials - PD provided by the Teacher Librarian supports this kind of instruction. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 19 | Linden | N/A | In the section titled, Literacy-Rich Environments and Experiences, school libraries should be mentioned as one way to provide literacy-rich environments and experiences to students in each age category, infant/toddler, preschool, TK-grade 5, and grades 6 -12. This section of the document mentions interest in print materials as one competency of language development. I suggest the inclusion (alongside the other frameworks' statements) of recommendations for every age category in this section of the CA Model School Library Standards to provide a guide to LEAs and schools when they are addressing the strategies they can employ in order to provide those literacy-rich environments and experiences through the school library. In the section mentioning suggested collaborations on Slide 132, please include a suggested collaboration between teachers and school library staff and MENTION of school library staff in the collaboration paragraph alongside ELA teachers, specialists, admin, etc. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 20 | Onofre | 69–79 | Pg 69-79 Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development Pg 69 The first bullet should be replaced with: Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. Pgs 76-79 There are many types of disabilities connected to reading and learning disabilities. This plan needs to be balanced and include other examples. Dyslexia should not be singled out in the title but be a subsection on a Language Processing and Disabilities Section. | Duplicate comment. See response above. |
| 21 | Spiegel Coleman | 76–78 | One of the most important aspects of the plan is that all sections should be coherent and aligned. Under the section, Comprehensive Literacy Model, we agree that the foundational piece for the plan should be the ELA/ELD Framework and especially the thorough treatment of the Circles of Implementation and the five themes of Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. Step 3, for all grade level spans, should use these five themes for addressing instruction and programs. No one them should dominate over others and no themes should be left unaddressed. These plans and the funding would bring strong support to implementation of the Framework. Foundational skills are important but the other four themes should be addressed equally for their importance. Here again on pages 76-78, a more comprehensive treatment of a variety of learning disabilities needs to be addressed. For grades -12 "genuine inquiry" should be added. | Not recommended. The statewide literacy priorities include building capacity for teaching foundational skills and supporting students with dyslexia because these were identified as statewide needs and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 22 | Bloom | N/A | More emphasis and explicit guidance needs to be given related to Structured Literacy, Universal Screening, and evidence-based models of reading development in this section. Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP. Details about the diagnostic measures involved in universal screening, along with explicit guidelines for incorporating universal screening within a Multi-Tiered System of Support need to be described. The SLP draft does not describe a comprehensive, integrated English Language Arts program, but instead perpetuates a top-down model that emphasizes meaning making without explicitly acknowledging that literacy is dependent upon the primary acquisition of foundational skills. Foundational skills receive some atte | Duplicate comment. See response above. |
| 23 | Anderson | N/A | The preventative power of universal screening for signs of dyslexia is not expressed in the SLP Draft. Diagnostic screening is critical to the effective implementation of MTSS, but receives little attention in the SLP Draft. Children at-risk for reading failure can be reliably identified even before kindergarten by assessing their emergent literacy skills and with early identification and prevention programs, the number of children who are placed in special education can be reduced by up to 70%. | Not actionable. Universal screening is promoted in this section and in the *ELA/ELD Framework*. |
| 24 | Petish | N/A | This is an adequate part of the plan. The Tier 1 Instruction in Foundational Skills, Reading, and Writing section was organized around the 5 components of reading. This is the direction we were looking for in the comprehensive model and in Step 1: Set Direction and Purpose. Models such as the Simple View of Reading and Scarborough’s Reading Rope would convey the needed integration of these components rather than them being represented as separate pillars. In the subsection on phonics, we suggest including the term “orthographic mapping” in the second paragraph. | Duplicate comment. See response above. |
| 25 | Sorensen | N/A | TK-grades 5: include Common Core en espanol as a resource for biliteracy instruction as well as more references for information on transference of reading skills across languages; guiding principles for dual language education reading intervention with ELs should address both reading skills and target language development, not treat them as the same as an EO student loan grades 6-12 keep all priorities; keep language on need to train all teachers, not just ELA teacher in literacy instruction and need for collaboration structures; keep focus on culturally sustaining pedagogies and on developing biliteracy focus on building family capacity is absent after birth-five: how can we continue to partner with families for all their child's education? | Recommended. Biliteracy resources such as the *Common Core en Español* and the *Spanish Language Development Standards* will be added as resources in this section. Although family and community engagement were not identified as a statewide priority for all age/grade bands, it is included in the Comprehensive and Integrated Literacy Model, which sets the direction for high-quality literacy programs. |
| 26 | Lockwood | 77 | Page 77 Students Struggling with Reading “In order for schools and districts to address the needs of students, teachers should be provided with high-quality professional development that covers topics such as managing effective small group instruction, reading foundations, language and literacy development, and increasing teacher awareness and understanding of state guidance documents such as the California Dyslexia Guidelines and the ELA/ELD Framework.” Professional development should occur for these strategies so that students gain proficiency in reading. However, it should be noted that all students, both struggling and proficient, need access to text (books) and access often comes though the school library. School libraries provide equitable access because resources are shared by all students. And yet again, school library access, development of a quality program or inclusion of a valued collaborative literacy partner in a teacher librarian is not mentioned in the SLP as an effecti | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 27 | Wong | 69–79 | Pages 69-79: Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development Page 69: The first bullet should be replaced with: Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. Page 76-78: There are many types of disabilities connected to reading and learning disabilities. This plan needs to be balanced and include other examples. Dyslexia should not be singled out in the title but be a subsection on a Language Processing and Disabilities Section. Page 79: For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Duplicate comment. See response above. |
| 28 | Hatcher Day | N/A | Libraries need to be embedded in the plan for improvement. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 29 | McMillan | N/A | This is clearly the most important place to insert the importance of having credentialed teacher librarians at every school site. The teacher librarian can make sure appropriate texts are ready for students as the increase their reading independence. The teacher librarian can guide students and teachers as they increase their competencies in regard to research skills and media literacy. Finally the school library is the learning hub for literacy and scholarship at any school site. | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 30 | Sedgwick | N/A | Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression for the first bullet. There are many types of disabilities connected to reading and learning disabilities. This plan needs to be balanced and include other examples. | Duplicate comment. See response above. |
| 31 | Raygoza | 76–78 | The themes of the ELA/ELD Framework should serve to organize this part of the plan. The five key themes should be included in Tier 1 intentionally. In all grades, TK-12, the themes should be used to address the plan for improvement and should refer back to the student subgroups that were identified as having the greatest need in the survey and state data. Although foundational skills are important in the development of literacy, the focus should not just be on foundational skills. The five themes are meant to be addressed comprehensively and leaving out or lightly touching on Effective Expression and Language Development is detrimental, especially to English learners. Also, the State Literacy Plan should align with other State Frameworks and documents. Page 76-78 Students in California have a variety of disabilities that should be addressed in this plan. Dyslexia should not be highlighted in the title. Perhaps it belongs in a subsection on Language Processing and Disabilities. | Duplicate comment. See response above. |
| 32 | Iturralde | N/A | This plan must make a firm commitment to evidence-based, structured literacy practices, including by defining and prioritizing these models. If the plan does not promote structured literacy, this will result in further waste of public funds beyond what is already occurring across the state in our schools using harmful "balanced literacy" approaches. Universal screening for dyslexia is a critical need, not only for identifying students with this learning disorder but also students who have more easily modifiable reading difficulties. Due to widespread use of "balanced literacy," large populations of students are poorly served in our schools. This results in preventable failures for students who should be typical readers, but instead have not been properly taught how to read. Students who are English learners, low-income, or from non-White backgrounds appear especially vulnerable to these types of preventable reading difficulties due to the incredibly poor instruction in foundational s | Not recommended. This section includes structured literacy, universal screening, and building capacity for teaching foundational skills. |
| 33a | Hernandez | 19–22 | General Comment for this section: If there is one recommendation that supersedes all of the others, it is the modification of the organization and framing of this section of the plan. On pages 19-22 the plan clearly uses the ELA/ELD Framework as the guiding document which provides an excellent overview of the Five Key Themes of literacy: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development. It is our recommendation that those themes serve as the organizational structure of this part of the plan. Tier 1 should include all of these Five Key Themes with intentionality. Grades TK -5 and 6-12 should both use these themes to address the plan for improvement and refer back to the student subgroups that were identified as having the greatest needs in the survey and state data. | Not recommended. The statewide literacy priorities include building capacity for teaching foundational skills because this was identified as a statewide need and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. |
| 33b | Hernandez (continued) | N/A | Each key theme should be treated comprehensively, and no one theme should dominate the description of what is needed for improvement. In addition to the ELA/ELD Framework, we suggest referring to the California Commission on Teacher Credentialing recently adopted, November, 2019, Literacy Teaching Performance Expectation as an example of how the five themes are described for teacher expectations. The State Literacy Plan should align with other State Frameworks and documents. We support foundational skills as critical, but they are only one of the five themes. In-depth treatment of this one theme and minimal attention or none to the other key themes is evidence of the need for revision. Effective Expression and Language Development are nonexistent or minimally mentioned and are critical components of a comprehensive view of literacy especially for English learners. This section needs much attention, augmentation, and revision. Specific recommendations to language in this section: Page 69: The first bullet should be replaced with: Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. | Not Recommended. The statewide literacy priorities include building capacity for teaching foundational skills because this was identified as a statewide need and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. The California Literacy Teaching Performance Expectations will be added. |
| 33c | Hernandez (continued) | 76–78, 79 | Pages 76-78 RE Dyslexia: We recognize that special and general education students have a variety of disabilities that should be addressed in this plan. There are many types of disabilities connected to reading and learning. This plan needs to be balanced and include other examples. Dyslexia should not be singled out in the title but be a subsection on a Language Processing and Disabilities Section. The suggestion to screen every kindergarten student for Dyslexia is not recommended. Teachers through their observations are the best source to recommend screening for dyslexia and other disabilities. Many students do not display language processing problems and do not need to be screened. Criteria for screening should be determined, but screening every student for one potential disability is not feasible nor warranted. Before second grade, it is more important to focus on an evaluation as a precursor for identification of specific reading disabilities. There are many conditions that contribute to struggling readers. Dyslexia is only one type of disability and should not be the driving force to define early literacy problems. On Page 79 for grades 6-12: it would be good to add “genuine inquiry” in the first bullet point. | Not recommended. The CDE recognizes the range of disabilities that may influence literacy development. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. Activities supported by the CLSD grant will be aligned to the *California Dyslexia Guidelines* and the *California Practitioner’s Guide for Educating English Learners with Disabilities*. |
| 34a | Ramos Harris | 62, 67, 69 | Pg.62 Birth to Age 5 Statewide Literacy Priorities: ● In the first priority, add language around supporting biliteracy and creating language-rich environments/experiences that are culturally responsive/sustaining to the diversity of children reflected in the early learning setting. ● In the second priority, include language around the importance of supporting home language in the home with families to support language development and biliteracy. Pg.67 It is important to mention DLLs starting from the introduction and throughout all early childhood sections, rather than only later in the plan. Pg. 69 It would be important to understand what 80% success in Tier 1 instruction looks like for Birth to age Five for DLLs. How is this measured? DRDP? There is no mention in the plan about the importance of bilingual assessors who match the language background of the DLLs they are assessing on the DRDP. | Recommended. Language regarding biliteracy from state guidance and policies will be added to the Introduction and in the Birth to Age Five sections. Information regarding the ELD Desired Results Developmental Profile (DRDP) and guidance for observation and documentation of young dual language learners (DLLs) will be added to this section and the Assessment Systems section of the Comprehensive and Integrated Literacy Model. |
| 34b | Ramos Harris (continued) | 74, 76 | Pg.74 While primary language support is included, this can be mentioned earlier on and woven through. Primary language support is especially critical in the earliest years. Pg. 76 Recommend this section explicitly address the use of multiple, bilingual measures to examine DLLs/ELs’ progress, and the danger of confusing English language development with a reading/language disability when only measures in English are used, and/or when the assessors are unfamiliar with English language acquisition theory and have not been trained in how to interpret assessment results for DLL/ELs. Would be critical to ensure this Plan meaningfully mentions articulation/alignment with ECE to K-12. | Recommended. Language regarding biliteracy from state guidance and policies will be added to the Introduction and in the Birth to Age Five sections. Information regarding the ELD DRDP and guidance for observation and documentation of young DLLs will be added to this section and the Assessment Systems section of the Comprehensive and Integrated Literacy Model. |
| 35 | Martinez | 69, 76, 82 | On p. 69, the para on "Tier 1 Instruction" what does 80% success in Tier 1 instruction for PK – 3rd grade DLLs/ELs mean? How is this measured? DRDP? I don’t see anything in here that talks about the importance of trained bilingual assessors who match the language background of the DLLs they are assessing on the DRDP. On p. 76, the section on "Supporting Students Struggling with Reading..." needs to explicitly address the use of multiple, bilingual measures to examine DLLs/ELs’ progress, and the danger of confusing English language development with a reading/language disability when only measures in English are used, and/or when the assessors are unfamiliar with English language acquisition theory and have not been trained in how to interpret assessment results for DLL/ELs. On p. 82, the "Culturally Responsive Teaching" section begins with, "In reviewing CAASPP ELA/Literacy results, achievement gaps between English learners and students of color and their English only and white peers a | Recommended. Information regarding the ELD DRDP and guidance for observation and documentation of young DLLs will be added to this section and the Assessment Systems section of the Comprehensive and Integrated Literacy Model. |
| 36 | Merritt | N/A | Promoting Bilingualism and Biliteracy -- glad it's there, but how will we do that? Grades 6 to 12 -- what are the biliteracy priorities? Reference to the Seal of Biliteracy is hidden in section on culturally responsive teaching -- no sense of it as a priority in itself. That has to change. | Not actionable. Biliteracy is addressed in the Comprehensive and Integrated Literacy Model, which sets the direction for high-quality literacy programs. Biliteracy is also promoted in the statewide literacy priorities. |
| 37 | McNamara | 69–86 | p 69-86 Definition of literacy needs to be broadened to encompasses the literacies of 2020. Teacher librarians and classroom teachers work together to develop collections representative of curricular needs in various formats and levels helping all students access the needed and wanted information. p 82 Every time a teacher librarian has a conversation with a reader (Readers Advisory) they are being culturally responsive and assessing student's social and emotional learning needs. | Recommended. Language from the *California* *World Language Standards* will be added regarding the different literacies students acquire. |
| 38 | Tran | 69–79 | Pages 69-79 Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development Page 69 The first bullet should be replaced with: Build school capacity for implementing the Key Themes of ELA/Literacy and ELD Instruction: Meaning Making; Language Development; Content Knowledge; Foundational Skills; and Effective Expression. Page 76-78 There are many types of disabilities connected to reading and learning disabilities. This plan needs to be balanced and include other examples. Dyslexia should not be singled out in the title but be a subsection on a Language Processing and Disabilities Section. Page 79 For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Duplicate comment. See response above. |
| 39 | Sheppard | 62, 67, 80, 82 | The committee claims "evidenced-based" programs and interventions, yet a large body fo research has been ignored that recognizes the critical impact of a certificated Teacher Librarian and literacy achievement of students in both high and low SES schools. This needs to be considered in plans for improving our students literacy performance. p62 "suuport literacy-rich environments" ignores the equitable access to every student and community in a school, the library. p67 School libraries provide "windows, mirrors and sliding glass doors" for students and their families with multiple languages through both print and digital resources reviewed and vetted at readability levels for all. p80 Teacher Librarians are the expert on disciplinary literacy for learners, supporting both students and teachers across the school community. p82 Culturally responsive teaching as well as SEL is done every time a student in a library, physically or virtually, is made to feel the personalized "third spac | Recommended. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 40 | Linn-Nieves | 23–24, 75–79, 88 | pp.75-79 "Tier 1 Instruction" should mirror the 5 themes of the ELA/ELD Framework referenced on pp. 23-24. Big ideas in addition to foundational skills are missing. p. 79 The title of the section is 'ELA/ELD Framework', but is actually referring to English learners and integrated and designated ELD. I suggest renaming it 'Integrated and Designated ELD' or 'English Language Development' or 'English Learners.' p. 88 Culturally Responsive Teaching does not just belong in grades 6-12, rather throughout.. | Not recommended. The statewide literacy priorities include building capacity for teaching foundational skills because this was identified as a statewide need and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. This section is organized by key state guidance and resources. Culturally responsive teaching is included in the Comprehensive and Integrated Literacy Model, which sets the direction for high-quality literacy programs. |
| 41 | Alexander | 80 | Page 80 – Disciplinary Literacy -3rd paragraph A rewrite of this sentence: “From this perspective, speakers and writers make deliberate choices about how they use particular language resources and how they organize their spoken or written texts.” offers another opportunity to widen the reader's perspective. As often scientists, artists, and others create, making deliberate choices, “texts” that are not only spoken or written, the sentence above could be rewritten to acknowledge additional forms of disciplinary literacy. A possible rewrite: “From this perspective, speakers and writers make deliberate choices about how they use particular language resources and how they organize their spoken, written, aural, or visual texts. “ Same paragraph – to widen and be more inclusive of other disciplines, a suggestion to add “...or the arts” to the third sentence to read… "An argumentative text in history or the arts share some common features with arguments in literature or science, but ther | Recommended. Revisions align with the interdisciplinary approach promoted in the *ELA/ELD Framework*. |
| 42 | Tompkins | N/A | This section doesn't look much different than what is currently in place. There is a lack of detail in phonological awareness, the foundation of reading. What happens if a student doesn't develop P.A. in elementary school? Then it goes on to describe Phonics but doesn't mention using Decodable books to teach and reinforce decoding skills.Level Reading books do not help students that need explicit instruction on learning how to decode.The section on Fluency doesn't mention if students are not fluent what possible issues could be causing this lack of fluency. My son couldn't read fluently, so they gave him passages to re-read to improve his speed. This did nothing to correct the deficits in phonological awareness that was causing his lack of fluency.The section on Vocabulary doesn't mention how to teaching vocabulary, Structure Word Inquiry helps students understand the meanings by breaking down words rather than relying on rote memorization. Spelling is not even mentioned, why? | Not recommended. CLSD activities will be aligned to the comprehensive guidance provided in the *ELA/ELD Framework*, among other state guidance and policy documents. |
| 43 | Budz | N/A | Reading Comprehension emphasized in the paragraph stating "A panel of experts in its improving Reading Comprehension in Kindergarten Through 3rd Grade..." is critical as it seems that their are other experts in the field downplaying the emphasis of comprehension for the sake of strict decoding with use of text that is decodable, but not necessarily comprehensible. Appreciate the emphasis of writing being taught, not merely assigned and graded in all grades. Wondering if there needs to be a statement that emphasizes writing instruction having its own time as a subject to be taught in the ELA block. I have observed that too many school schedules, especially in grades TK-5, do not allow for writing instruction to be taught on its own, where students learn and practice writing with meaningful feedback from the teacher in the form of conferences and small group instruction, not merely comments, corrections, or grades on the students' writing. Classroom coaching is key for improvement. | Not recommended. Writing instruction is promoted in the comprehensive and integrated approach of the *ELA/ELD Framework*. Coaching is included in the Professional Learning section of the Comprehensive and Integrated Literacy Model. |
| 44 | Hohls | 69–86 | P69-86 Expand the term to "Broadly Literate" (see Chapt. 2, p.55). Educators develop literacy skills by creating opportunities for students to read widely through independent, self-guided reading, and by having teachers read aloud. For students to become broadly literate, they need to read regularly and frequently as part of a variety of content area instruction. Abundant exposure to rich texts is a clear focus of the CA CCSS for ALE/Literacy and the CA ELD Standards. The MSLS ensure that teaching includes information literacy in all areas of instruction to balance the fluency and comprehension of literacy skill development. P69-79 Research projects are an important for building content knowledge and developing inquiry skills. A child's curiosity fuels the pursuit information needed to answer questions. Research is an effective way to integrate the CA CCSS for ELA/Literacy. The Model School Library Standards provide a step-by-step map for gradually developing student research skills. | Recommended. The Learning in the 21st Century section will be expanded to include information about the *ELA/ELD Framework* goals of students becoming broadly literate and acquiring the skills for living and learning in the 21st century. Guidance from the *California Model School Library Standard*s and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 45 | Bishop | N/A | Focus on broadly literate. Educators develop students' broad literacy by ensuring that students read widely, in part through the implementation of an independent reading program and by reading aloud. For an abundant exposure to rich texts is a clear focus of the CA CCSS for ELA/Literacy and is amplified by the CA ELD Standards & the Teacher Librarian is the amplifier, teachers and teacher librarians work together to develop classroom and library collections of books that support all content areas andgenres literary and informational. The CA Model School Library Standards (CDE 2010) and the CA ELD Standards amplify and highlight many of the skills demanded by research. Research projects are an important part of building content knowledge. Teacher Librarians teach teachers how to help students conduct research. Children pursue questions and gather relevant information.Research is a powerful way to integrate many of the CA CCSS for ELA/Literacy. | Recommended. The Learning in the 21st Century section will be expanded to include information about the *ELA/ELD Framework* goals of students becoming broadly literate and acquiring the skills for living and learning in the 21st century. Guidance from the *California Model School Library Standards* and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated into this section as appropriate. |
| 46 | Gustafson Corea | N/A | SLP Continuous Improvement Process: Step 3: Plan for Improvement Tier 1 should include all of the Five Key Themes of ELA/Literacy and ELD Instruction: Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development. | Duplicate comment. See response above. |

## Table 7: SLP Continuous Improvement Process – Step 4: Implement and Monitor Work

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Ballesteros | N/A | Greatly appreciate the support of CDE to regularly monitor, and provide technical assistance and webinars. | Not actionable. |
| 2 | Schneider | N/A | If you really want to see data that monitor literacy development, I encourage the committee to ask school library staff across the state to show you the data they collect for their annual board reports, showing the trainings they have done for staff and students; the materials they have thoughtfully and deliberately purchased and curated to support content, disciplinary literacy, information literacy, social and emotional health, and motivation to read voraciously; stories read to support phonemic awareness and content; reading groups sponsored; library programming to provide literacy practice and a safe space for students; support for parent literacy; and more. I am also deeply concerned that the work is to implemented and monitored by the COE. In my region, the COEs have no library dept, so not only have libraries missed out in your draft report, but will continue to lose in the COE literacy work to be done, if the COE does not have library leadership to bring this awareness to the | Not actionable. This section describes how the CDE will implement and monitor the statewide activities supported by the CLSD grant. As noted above, the *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model and relevant guidance from the standards will be incorporated in Step 3. Consequently, Local Literacy Lead Agencies will need to consider the role of school libraries in addressing the statewide literacy priorities. |
| 3 | Lane | 86 | "At the local level, LEAs are encouraged to examine the progress of literacy improvement actions, outputs, and strategy-aligned milestones. LEAs may establish local literacy teams responsible for implementation and monitoring that meet regularly to discuss progress and report to leadership teams for support." School libraries need to be included here. They've got valuable data to share - circulation statistics, collection development, PD provided to teachers by Teacher Librarians. At the very least, COE's should be a partner with CDE. I am the Library Media Coordinator (credentialed) for my COE, but I'm only one of 2 in Region 2. We need a place at the table. | Recommended. This Local Level box will be expanded to include recommended members of local literacy teams, including Teacher Librarians and other appropriate school staff. |
| 4 | Archon | N/A | For this plan to have the most impact I believe that monitoring of the develop of school libraries and thus, the resources students have access to (as well as the help to find and access these resources) should be included in this plan. | Not actionable. This section describes how the CDE will implement and monitor the statewide activities supported by the CLSD grant. As noted above, the *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model and relevant guidance from the standards will be incorporated in Step 3. |
| 5 | McKeeman Rice | N/A | I would like to see a functional plan. This language speaks in generalities. States and schools that have made significant progress have completed inquiry cycles with root cause analysis that identifies which literacy practices are missing and then creates a tight and comprehensive plan around those practices. This creates a cohesive and specific plan that can target practices and have a chance of actually making an impact. | Duplicate comment. See response above. |
| 6 | Younglove | N/A | Step 4: Yes, having local literacy teams to interact with and report to the State Literacy Team and /or the California Department of Education makes good sense. | Not actionable. |
| 7 | Hurd | N/A | Instead of just measuring and monitoring activity, the state should monitor student data for the LEAs that receive grant funds. If LEAs implement evidence-based practices aligned with Structured Literacy, they should be able to show improvement in DIBELS/Acadience/Aimsweb/Fastbridge or comparable data for students, and they should be eager to share it. If their data doesn’t show improvement, something is wrong with their implementation. | Recommended. Relevant student outcomes will be measured and reported by the Local Literacy Lead Agencies. This information will be added to the SLP as appropriate. |
| 8 | Fisher | N/A | Districts are asking for help implementing the Dyslexia Guidelines - this seems to me like a perfect opportunity to help them with IMPLEMENTATION | Not actionable. The statewide literacy priorities currently include building capacity for supporting students with dyslexia, which will be implemented in alignment with the *California Dyslexia Guidelines*. |
| 9 | Aste | 79 | p.79 For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Not actionable. This section describes how the CDE will implement and monitor the statewide activities supported by the CLSD grant. State-level activities will be aligned to the interdisciplinary approach promoted in the *ELA/ELD Framework*. |
| 10 | Sapien | 79 | Page 79: For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Duplicate comment. See response above. |
| 11 | Schlagel | N/A | No criteria was given for measuring success. How many teachers do we want to watch these webinars? What should the effect be in their classroom? What kind of improvement are we looking for? How many LEAs are you trying to reach? What are our “SMART Goals”? Where will the public go to monitor implementation of this SLP? How often will the CDE provide status updates? Survey participants clearly indicated that they need assistance with developing frameworks, implementation, and creating a monitoring system. None of these were addressed in the document. The State should create solutions to these challenges thereby reducing the burden and expense on LEAs. Develop a curriculum and train 25 teams of experts to coach 20 LEAs per year. Measure success of the teams based on student outcomes. Now is the time to make bold changes to improve student outcomes. LEAs need a real plan. | Not actionable. Outcomes are included in the SLP Logic Model. The public is encouraged to visit the CLSD web page and join the CLSD listserv for updates. Step 3 addresses the plan for improvement. |
| 12 | Williams | N/A | Making sure that all stakeholders are present at the school site and District Level decision making is most important. Making sure that every teacher and administrator knows that this document and its goals exist and how they can participate is critical. | Recommended. Specific staff will be listed as important members of local literacy teams. Once the SLP is adopted by the SBE, it will be disseminated statewide. |
| 13 | Onofre | 79 | Pg 79 For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Not actionable. This comment does not apply to this section. |
| 14 | Petish | N/A | Instead of just measuring and monitoring activity, the state should monitor student data for the LEAs that receive grant funds. If LEAs implement evidence-based practices aligned with Structured Literacy, they should be able to show improvement in DIBELS/Acadience/Aimsweb/Fastbridge or comparable data for students, and they would be eager to share it. If their data doesn’t show improvement, something is wrong with their implementation. | Duplicate comment. See response above. |
| 15 | Sorensen | N/A | what about measuring quality of webinars/activities through feedback of participants? can local impact data of COE's implementing strategy be collected and reported? | Recommended. Quality, usefulness, and impact of CLSD webinars and activities will be measured and monitored. Local Literacy Lead Agencies will be required to collect and report impact data. Language will be added as appropriate. |
| 16 | Wong | 79 | Page 79: For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Duplicate comment. See response above. |
| 17 | Pichot | N/A | More details should be provided on the foundational skills required to read, write and spell as well and the way to measure progress quaterly. | Not actionable. Comment does not apply to this section. Guidance regarding measuring student progress is included in the *ELA/ELD Framework*. |
| 18 | McMillan | N/A | Consider including teacher librarians as you implement and monitor progress in this plan. | Recommended. This Local Level box will be expanded to include recommended members of local literacy teams, including Teacher Librarians and other appropriate school staff. |
| 19 | Ramos Harris | 86 | Pg.86 Will the state consider prioritizing or at least ensuring a representative sample of LEAs with high EL percentages that are implementing long-term bilingual/dual language programs? | Not actionable. Local Literacy Lead Agency grants will be administered through a competitive grant process to implement and study strategies to address statewide literacy priorities. |
| 20 | Martinez | 86 | On p. 86, RE: the number of grant applications listed as an output, will the state consider prioritizing or at least ensuring a representative sample of LEAs with high ELs percentages that are implementing long-term bilingual/dual language programs? | Duplicate comment. See response above. |
| 21 | McNamara | N/A | Information on libraries and time and effort necessary to collaborate with teacher librarians to increases all literacies needs to be included. We are at a further literacy disadvantage with so many County Offices of Education not have a credentialed librarian to lead the charge of literacy. To value literacy, literacy experts need to be accessible at all levels. | Recommended. This Local Level box will be expanded to include recommended members of local literacy teams, including Teacher Librarians and other appropriate school staff. |
| 22 | Tran | 79 | Page 79 For grades 6-12, it would be good to add “genuine inquiry” in the first bullet point to promote cross-discipline literacy. | Duplicate comment. See response above. |
| 23 | Sheppard | N/A | Have you considered data from each school site where Teacher Librarians have purchased materials both print and digital to support literacy; curated articles, websites, print and digital databases to support all content areas in all literacies (financial, media, digital and more); supporting social and emotional health; motivated recreational reading; reading groups and library porogramming to support literacy practice; community literacy events; and all while providing the "third space" a safe haven for practice and personalized learning for the entire community and whole child. I wonder if the COE that's chosen to monitor the work will have any library department so that again school libraries are left out bringing again less awareness to the regions and the entire state of California students. | Not actionable. As noted above, the *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model and relevant guidance from the standards will be incorporated in Step 3.  Recommended. This Local Level box will be expanded to include recommended members of local literacy teams, including Teacher Librarians and other appropriate school staff. |
| 24 | Tompkins | N/A | Most students would never become special education students if they were provided appropriate literacy instruction in the general education classroom. There needs to clear understanding that appropriate Structured Literacy instruction, using decodable books, and focusing on basic literacy skills. This is one paragraph that vaguely describes "Structured Literacy" but gives no real detail so a teacher, parent, or district can properly identify a Structured Literacy Program. There are many programs districts have used for over 10 to 15 years and these programs state they are evidenced-based but they do nothing to teach the struggling reader. Please remember the kids that are in the classroom, failing every day, wanting, wishing they knew how to read! I wanted to learn how to read, I cried every night wishing I would read like my friends. Please help these kids! These kids need assistive technology and audiobooks. | Not actionable. This comment does not apply to this section. |
| 25 | Hohls | 86 | P86 Include library staffing, budgets, and programming in any implementation or monitoring plan. | Recommended. This Local Level box will be expanded to include recommended members of local literacy teams, including Teacher Librarians and other appropriate school staff. |

## Table 8: SLP Continuous Improvement Process – Step 5: Reflect and Adjust Course

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Ballesteros | N/A | This focus of reflection and adjusting course is a good addition. This creates an atmosphere of respect. | Not actionable. |
| 2 | Velasco | N/A | Where are examplars here? If a plan continues to not work, what support is given to the LEA to make change is the program is not working. This needs to include research citations as well as other school districts who are succeeding in literacy to look to models to follow. These models must include those with large numbers of EL populations not just high achieving affluent districts. | Not actionable. As noted in Step 3, the statewide literacy priorities will be implemented and studied by Local Literacy Lead Agencies. Grantees will be required to build expertise in the and implement strategy with one or more local districts. These strategies must align with state guidance and policies, must be evidence-based, and support the literacy needs of economically disadvantaged and high-needs students. In Step 5, the CDE will consider the expansion of these pilots across the state and how they can serve as models to other districts. |
| 3 | Schneider | N/A | Before accepting this draft as the final version, the state must reflect on the glaring omission of school libraries from this document and adjust course to include them as central, vital resources for developing students literacy for a lifetime. | Not actionable. This section describes how the CDE will reflect on the activities supported by the CLSD grant and adjust course as appropriate. |
| 4 | Lane | 93 | Because school libraries with credentialed teacher librarians are sorely lacking in Region 2 and many of the counties north of Sacramento, this area in the plan should include school librarias in the "At the local level" box on p. 93 | Not actionable. This section describes how the CDE will reflect on the activities supported by the CLSD grant and adjust course as appropriate. |
| 5 | Archon | N/A | I hope that a deep reflection of this draft plan would include time to pause and then see how school libraries can and should be included in this plan. Strong school libraries (appropriately resourced, funded and staffed (library technician and a Teacher Librarian) will help this program immensely. | Not actionable. This section describes how the CDE will reflect on the activities supported by the CLSD grant and adjust course as appropriate. |
| 6 | McKeeman Rice | N/A | I would like to see a functional plan. This language speaks in generalities. States and schools that have made significant progress have completed inquiry cycles with root cause analysis that identifies which literacy practices are missing and then creates a tight and comprehensive plan around those practices. This creates a cohesive and specific plan that can target practices and have a chance of actually making an impact. | Duplicate comment. See response above. |
| 7 | Younglove | N/A | Step 5: Just as assessment in a classroom should be used to improve instruction, so reflection and adjustments should be outcomes of the direction and purpose of the State Literacy Plan itself. I do not believe, however, that the constant use of benchmark testing helps, in the long run. | Not actionable. |
| 8 | Turkie | N/A | According to the California State Audit of School Libraries in 2016, California ranks number 50 in the US for school library services. I have to wonder then why the CDE, an organization that could affect top down change, does not work toward a paradigm shift in how school libraries are perceived and utilized. By the very nature of their jobs, Teacher-Librarians are more highly qualified than a general classroom teacher. They must not only have a teaching credential, but also postgraduate credentialing or a Master’s Degree in Library and Information Sciences. Why would you not include these valuable contributors in this plan? If our children are to receive a high quality 21st century education, then we need to create a more robust environment with distributed leadership that allows for a dynamic literacy plan. The State Literacy Plan is exactly what it seems to be a document created to check a box. | Not actionable. This section describes how the CDE will reflect on the activities supported by the CLSD grant and adjust course as appropriate. |
| 9 | Aste | N/A | Overall, many positives: a strong focus on ELA/ELD Framework; educational equity; diversity of California’s students; inclusion of the Early Education Programs and Early Learning Preschool Foundations; strong section on EL Roadmap, and EDGE; uplifts Seal of Biliteracy. However, these positives need to be carried throughout the document with more fidelity. Significant portions of the document address only one disability. An overemphasis one of the Five Key Themes of ELA/Literacy and ELD Instruction, and other themes are mostly neglected. Ample reminders of LEA’s role and responsibilities. Need to add more guidance for students in dual language and biliteracy programs Plan should address the subgroups in the achievement data and the results from the survey | Not actionable. The statewide literacy priorities include building capacity for teaching foundational skills, supporting students who are struggling with reading, and supporting English learners, as identified by the needs assessment and the State Literacy Team. More resources to support LEAs will be developed through state-level activities. |
| 10 | Schlagel | N/A | It is difficult to reflect and adjust course without clearly defined criteria to measure against. This is an instance where education should take a page from the business community and develop a more direct plan to address the problems the State is facing. This SLP is not designed to deliver reflection and course adjustments; it is designed for outcomes to stay the same. The list of experts who advised on this document is extremely impressive. However, I do not believe that their suggestions were fully heard nor reflected in this SLP, just as the survey respondents concerns were not valued or addressed. | Not actionable. Outcomes listed in the SLP Logic Model will be used to reflect and adjust course. |
| 11 | Williams | N/A | Recognizing that far too many districts and school sites do not have a Teacher Librarian, it is important to identify the solutions that they can use to develop pathways for creating such positions. | Not actionable. Comment is not related to this section. |
| 12 | Onofre | N/A | • Ample reminders of LEA’s role and responsibilities. • Need to add more guidance for students in dual language and biliteracy programs | Not actionable. Comment is not related to this section. |
| 13 | McMillan | N/A | When it comes to reflecting on the sustainability of the plan, consider the fact that school libraries are set up to maintain materials in a way that classroom libraries cannot. This includes digital texts because the teacher librarian has the time and training to ensure that digital resources are relevant, current, and accessible. | Not actionable. Comment is not related to this section. |
| 14 | McNamara | N/A | This document must make adjustments to include Model School Library Standards as well as teacher librarians. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model and relevant guidance from the standards will be incorporated in Step 3. |
| 15 | Sheppard | N/A | I would ask before this draft is accepted that the state reflect on the lack of school libraries, the CA model school library standards and certificated Teacher Librarians. This draft must be adjusted to include the as critically central and vital in developing the whole child and whole community for a lifetime. | Not actionable. The *California Model School Library Standards* will be included in the Comprehensive and Integrated Literacy Model and relevant guidance from the standards will be incorporated in Step 3. |
| 16 | Tompkins | N/A | While I appreciate this is written for Educators, I can quickly see how this will be used against parents as a way to validate the schools are doing something. Even though that "something" is an ineffective method that will not close the reading gap. Parents are told year after year that their child will catch up, well guess what, if a student is not providing appropriate literacy instruction they will never catch up and learn to effectively read. My son has graduated high school and was never provided appropriate literacy instruction in high school, nor in elementary school. He relied on audiobooks to have material read to him and spell check to write. He couldn't effectively eye read but he still graduated. After high school, he is receiving literacy instruction so he can improve his ability to be literate. The struggle doesn't end for these students. They continue to struggle into adulthood, feeling shame, anxiety, and depression because of their lack of literacy skills. | Not actionable. |
| 17 | Hohls | 86–87 | P86-87 Include library staffing, budgets, and programming in any reflection or course adjustment evaluations or assessments. | Duplicate comment. See response above. |
| 18 | White | N/A | The CA Dyslexia Guidelines, developed by CDE pursuant to Section 56335 of the Education Code, as added by Chapter 647 of the Statutes of 2015 (Assembly Bill 1369 of the 2015–16 Regular Session), provides guidelines for educators, parents, and other stakeholders in identifying, assessing, and supporting pupils with dyslexia. While these guidelines created a road map for supporting pupils with dyslexia, the guidelines were developed before the establishment of the statewide system of support and are not integrated into those supports. Creation of the State Literacy Plan presented an opportunity to integrate these guidelines into a comprehensive plan for ensuring that CA’s most vulnerable students—those living in poverty, English learners, and children with disabilities—would receive instruction to “advance literacy skills through the use of evidence-based practices, activities, and interventions, including pre-literacy skills, reading, and writing” (page 9 of SLP). | Not actionable. |

## Table 9: Overall Evaluation Ratings Results

| **Rating** | **Excellent** | **Good** | **Fair** | **Poor** | **No Response** |
| --- | --- | --- | --- | --- | --- |
| Please rate the SLP overall. | 4 | 22 | 18 | 18 | 16 |
| Please rate the format and clarity. | 3 | 23 | 20 | 15 | 17 |
| Please rate the plan’s effectiveness in supporting local educational agencies to provide effective literacy instruction for birth through grade twelve. | 13 | 15 | 21 | 21 | 18 |
| Please rate the plan’s effectiveness in supporting effective literacy instruction for student populations who have been traditionally underserved. | 3 | 8 | 20 | 29 | 18 |

## Table 10: Additional Comments

### Email Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1a | Hahne | N/A | First, this plan is incredible and I am excited about the idea of integrating so many policies, standards, and resources. There are some brilliant minds on this team and I am thankful and relieved to see some familiar names.  I want to suggest adding one more component to the plan that may help streamline some of these efforts, or at the very least help ensure important aspects are considered: add resources to support LEAs, schools, and teachers with aligning NGSS, HSS, and ELA topics. | Recommended. More information regarding the integrated and interdisciplinary approach promoted in the *ELA/ELD Framework* will be included in the Comprehensive and Integrated Literacy Model, including references to snapshots and vignettes that illustrate how ELA, ELD, and content area instruction can be integrated. |
| 1b | Hahne (continued) | 122, 125 | As a Literacy Specialist supporting Title I schools in my California public school district, I often consider Hollis Scarborough’s reading rope when I talk about why students can or can’t read. I know that a systematic, explicit foundational reading program is the first step in supporting all students with automatic word recognition, but is especially vital for students with dyslexia. I know that close reading of complex grade level text is important for helping all students dig deeper into the craft and structure of a text and consider an author’s choices. Close analysis of vocabulary and complex sentences helps all students understand Academic Language and employ academic register when necessary, but it is especially vital for English Language Learners.   We also know, as you have cited many times in the document, how important it is for students to have content knowledge. On page 122, you specifically address comprehension, academic language and content knowledge. On page 125, after citing the Shanahans (experts in this conversation), you state, “In short, content knowledge facilitates literacy and language development.” Later, you reference the NGSS and HSS frameworks with emphasis towards Secondary teachers. | Not actionable. |
| 1c | Hahne (continued) | N/A | I imagine there is not one elementary school teacher in our state who wouldn’t agree that History-Social Studies and Science are important subjects to teach to all elementary students. Unfortunately, many do not have enough time or resources to teach them the way they are outlined in those content standards or frameworks. This is not just a California problem, this is an entire U.S problem. (For more information, visit knowledgematterscampaign.org or read Natalie Wexler’s The Knowledge Gap).  When children struggle with reading we often give them what amounts to another ELA block in their school-day comprised of reading a text at their level, perhaps some word work, and a little writing. These students are often taken out of class and instruction in new content (ie History or Science) for the rest of the class cannot take place because a teacher would never want to facilitate new content learning when all students were not present. So, no one is able to get the minutes of Science or History instruction that they need. It’s not that it is not happening, but I imagine the expert teaching that is outlined in the frameworks for these two subjects is still quite aspirational. So, how do we ensure all students have access to History and Science, and support students who struggle with reading?  1. We must support students who struggle with automatic word reading by giving them additional support with foundational reading skills. This is clearly stated in the draft of the State Literacy Plan. | Recommended. More information regarding the integrated and interdisciplinary approach promoted in the *ELA/ELD Framework* will be included in the Comprehensive and Integrated Literacy Model, including references to snapshots and vignettes that illustrate how ELA, ELD, and content area instruction can be integrated. |
| 1d | Hahne (continued) | N/A | 2. Students who struggle with comprehension don’t just need “more instruction with reading comprehension,” as stated in the plan. This is not specific enough and in danger of falling out of alignment with the latest research. (See Daniel Willingham’s work on reading strategies). If they need to work in a small group then they should be working with a teacher who scaffolds them into grade-level text, not text at their level (see Shanahan's analysis of reading level theory). It would be even better if this reading was aligned to topics the student was studying in the classroom. This will help give them the academic language and content knowledge to engage in whole class collaborative conversations. Choosing a lower-level text about a random topic does nothing to actually support the student to go deeper into the content areas and understand the academic language of their grade level. Unfortunately many teachers are using leveled libraries in exactly this way.  3. Finally, show teachers and school leaders how to plan a year’s worth of intentional literacy experiences that encapsulates all of the content areas. As an elementary ELA specialist, I struggled with finding meaningful ways to align curriculum and content areas until it finally dawned on me: Literacy lives in the context of the whole world. Whenever I tried to align topics in ELA, Science and History, I would always start with my ELA curriculum since, in my mind, it was the most important and vital of all subjects. Then, I realized that a goal of ELA is for students to have agency in Science, History, the Arts, and many other aspects of life. Perhaps we begin with the end in mind. | Recommended.  In Step 3, more guidance from the Supporting Students Strategically sections of the *ELA/ELD Framework* grade-band chapters will be included, citing specific recommendations from research. More information regarding the integrated and interdisciplinary approach promoted in the *ELA/ELD Framework* will be included in the Comprehensive and Integrated Literacy Model, including references to snapshots and vignettes that illustrate how ELA, ELD, and content area instruction can be integrated. |
| 1e | Hahne (continued) | N/A | So, I flipped my planning model this past summer. I started by laying out the NGSS units, then HSS units, and then aligning our ELA curriculum to those topics. I kept the units of our ELA program in order, since they help ensure we are aligned to Reading Standard 10 and that all students are getting access to texts within the appropriate grade level Lexile band. In my plan, I rearranged the order of the weeks within an ELA unit to help support or match the conversations and topics in the other disciplines. In this model, we still use all the texts in our ELA program, but we treat them as a text set that helps students build knowledge. We closely read texts and deconstruct sentences, often using a single text for multiple purposes. In my mind, this is how we will finally help all students with Literacy and to find their own voice within these disciplines. This also invites the students themselves to seek connections among seemingly unrelated topics, thereby enhancing opportunities for critical thinking, collaboration, communication and creativity.  In fact, the importance of getting this right has been elevated. We must teach Life Science in a pandemic, we must teach Economics during an economic depression, we must teach Civics when there is protesting in our streets. How else are our students, and all of us really, to make sense of any of this? There are foundational, apolitical understandings to each of the these areas that help students build capacity with them later on. This is not a venture we put only on the backs of Secondary teachers. We must send them students who know, understand, and are perhaps even excited to take on the disciplinary practices of Social Scientists, Historians, Scientists, and Artists. | Recommended. In Step 3, more guidance from the Supporting Students Strategically sections of the *ELA/ELD Framework* grade-band chapters will be included, citing specific recommendations from research. More information regarding the integrated and interdisciplinary approach promoted in the *ELA/ELD Framework* will be included in the Comprehensive and Integrated Literacy Model, including references to snapshots and vignettes that illustrate how ELA, ELD, and content area instruction can be integrated. |
| 1f | Hahne (continued) | 18 | It would be my personal suggestion that the NGSS and HSS Frameworks be added to the resource list on page 18 of the document; and a model or plan for aligning elementary instructional topics in NGSS, HSS, and ELA be incorporated. The plan clearly states the importance of teaching content in primary grades and beyond. Making these additions would further support elementary teachers with this vital literacy work.  Thank you for the efforts of the team. This is looking to be truly exemplary work. | Recommended. The Comprehensive and Integrated Literacy Model will be augmented to emphasize the inclusion of ALL Curriculum Frameworks, and additional references to frameworks other than the *ELA/ELD Framework* may be added throughout the SLP, as appropriate. |
| 2 | Brazell | N/A | As a parent of 2 dyslexic children “Whole Language” and “Balanced Literacy” NEVER gave them a chance to learn how to read even though both are Gifted (99.9th percentile) which was beyond frustrating and crushed their self-esteem.   Please stop using both programs as the only Reading program and teach students how they learn.  We (parents) paid $10k per child to have them taught phonics and reading fundamentals so they could decode words they didn’t recognize.  Michelle Nieto representing San Diego Unified School District on the SLP was one of our biggest problems in getting help from the District. Her input would be ill advised. | Not actionable. The SLP is not meant to establish new guidance on literacy curriculum or instruction. |
| 3a | Frost | N/A | On behalf of the California School Library Association, I am writing to provide comment on the work being done to implement the Comprehensive Literacy State Development Grant Plan.   First, we urge the Committee to include the Model School Library Standards (MSLS) into the compendium of resources that the Department of Education is weaving into the literacy plan. The Model Standards should be a critical component of each district’s development of a local literacy strategy. These standards are a critical element for enabling school districts to better understand how improved integration of the school library into the broader curriculum is critical to literacy development. The Model Standards have been integrated into the State’s accountability Dashboard, so it makes complete sense to include them as a resource for literacy development with these literacy grants. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 3b | Frost (continued) | N/A | Second, CSLA believes that the term “literacy” must be broadened beyond merely print resources and content. Literacy also needs to include media, informational, digital, technological, and visual content. Schools and school libraries have changed dramatically as 21st Century Learning Skills, the skills that will lead to students being successful in higher education and getting quality jobs, have become more commonplace. This change is even more critical when dealing with English language learners and students from low socio-economic backgrounds. CSLA urges that the program language be expanded to include the broader array of literacy content.  Finally, as a more broad-based comment on student literacy, it is the integrated work between classroom teachers and teacher librarians done at the school site that really leads to improved literacy and the mastery of reading. This approach is consistent with years of national research on student literacy. Adding this focus is the biggest improvement that could be made to the State Plan, and the field of education literacy.   Thank you for your consideration of these recommendations. Should you want to discuss these recommendations further please contact me at Jeff@BallFrostGroup.com or at (916) 769-3913. | Recommended. The Learning in the 21st Century section will be expanded to include information about the *ELA/ELD Framework* goals of students becoming broadly literate and acquiring the skills for living and learning in the 21st century, and definitions of specific literacies defined by the Partnership for 21st Century Skills will also be added. Additional references may be added throughout the document, as appropriate. |
| 4 | Younglove | N/A | Regarding the Appendices material, yes, California Assessment of Student Performance and Progress scores, particularly via demographic breakdowns, since 2015 in (representative) grades tested, will provide needed data, but decisions will have to be made regarding (e.g., 2020-forward) test results during the ongoing pandemic. What validity and reliability can they actually (possibly?) have? I would like to add here, one personal, experiential plea, and that is just how to provide/promote that “Equitable Access to Teachers.” Ideally, every teacher is/would be “highly qualified” to teach in his/her field. Site staffing needs, not to mention seniority itself, however, have made this goal much more difficult. I believe that, working together, state and local officials, as well as teacher unions, could improve the present situation. | Not actionable. |
| 5a | Weir | N/A | Diana Weir P.O. Box 1211 Mendocino, Ca. 95460 dianaweir@mcn.org 707-937-2012  October 25, 2020  California Comprehensive Literacy Team California Department of Education 1430 N. St. Sacramento, Ca. 95814  Dear Members of the California Comprehensive Literacy Team:  Please allow me to introduce myself to the Team. My name is Diana Weir, and I am a retired general and special educator, and reading specialist and literacy coach. I retired to California six years ago, and since that time have actively followed California’s educational literacy policies. I have a master’s degree in reading education and have taught literacy classes at the college level in Boise, Idaho, and at Dominican University, the Ukiah branch, prior to its closing in 2017. Although, I have officially retired, I am committed to encouraging evidence-based literacy professional development for teachers. | Not actionable. |
| 5b | Weir (continued) | N/A | I would like to begin by expressing my gratitude for the members of this team, and the many volunteer hours they have spent writing and editing this document. It is apparent that the members of this team have a passion for the reading process, and for ensuring the children of California have a successful experience learning to read.   My purpose in writing this letter is to specifically define my concerns with the present draft, and to provide feedback and suggestions for the final publication of the California Comprehensive Literacy Plan. There are three points I would like to address.   • The need for all schools and districts in California to commit to state-wide structured literacy instruction that addresses the needs of all students, including our struggling readers and dyslexic students.  • The need for equity when providing for the educational needs of California’s children of color. It is a matter of social justice. • An action plan that includes research-based professional development, the state-wide use of approved research-based reading programs, and the need for universal screeners for all California students. | Not actionable. Structured literacy, equity, professional learning, and universal screening are addressed in the SLP. Instructional materials are locally adopted. |
| 5c | Weir (continued) | N/A | There is presently a nationwide movement, initiated by progressive states such as ours, ensuring that their students receive effective literacy instruction. My hope is that the California team will consider joining this movement, as we use the most recent research, a consensus among reading researchers, to inform the teaching in our classrooms.   In 2019, the percentage of students who performed at or above the proficient level here in California was 32%, as compared to the national average of 34%. The measuring instrument was the National Assessment of Educational Progress (NAEP). This assessment help to inform decisions, about ways educators here in California can adjust our instructional tools to improve literacy instruction. | Not actionable. |
| 5d | Weir (continued) | N/A | In order to better understand these statistics, the researcher, Ms. Nancy Young, has published a “Ladder of Reading Infographic,” providing us a clear picture of our student population, and how they learn. The team is able to access this visual representation at www.nancyyoung.ca.  The statistics are as follows: • 5% of our population learn to read with little or no effort • 35% learn to read easily • 40 – 50% of our population require a code-based explicit, systematic and sequential mode of instruction • 10 – 15% of our population require additional repetitions and sophisticated diagnostic tools, in addition to code-based explicit, systematic and sequential instruction.   We know that 65% of our students will not learn to read unless their reading instruction is research based, meaning it is …  • Multisensory: See it, hear it, do it, speak it • Systematic: There is a scope and sequence • Cumulative: New concepts build on previous learning, and previous learning is reviewed • Explicit: Clear learning intentions | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies, and will be evidence-based. |
| 5e | Weir (continued) | N/A | With this knowledge of our state and national reading scores, a picture of how our student population learns, and the necessary components in an effective curriculum, the research of Dr. Louisa Moats is particularly important. Recently the American Federation of Teachers published her updated, “Teaching Reading is Rocket Science, 2020” https://www.aft.org..” In this landmark article, Dr. Moats suggests plans for This article can be found at the following address; https://www.aft.org. In this article, Dr. Moats suggests plans for teacher preparation, evidence informed classroom instruction, and the use of universal screeners. Mississippi, the only state that showed significant gains in their fourth-grade reading scores, attributes their student progress to teacher preparation in the science of reading, and the classroom application of the research by Dr. Moats. https://www.nytimes.com/2019/12/05/opinion/mississippi-schools-naep.html Researchers now estimate that 95% of all children, including students with dyslexia, can be taught to read by the end of first grade, when classroom instruction includes a range of research-based practices https://www.aft.org/sites/default/files/periodicals/EveryChildReading.pdf. Reading failure is preventable and unnecessary, and our dedication to effective literacy instruction will “Make a Difference” for California’s upcoming generation. | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 5f | Weir (continued) | N/A | In addressing the second point, the need for racial equality, your team recognizes that social justice is perhaps the largest state-wide concern, and that education is the equalizer. As we address the literacy needs of our brown and black California students, the message of two educational advocates can provide a model for our state. The first is researcher-journalist, Ms. Emily Hanford, and the second is Mr. Kareem Weaver, a member of our California team, and a leader in the Oakland NAACP Literacy Campaign. | Not actionable. |
| 5g | Weir (continued) | N/A | Here is access to Ms. Emily Hanford’s recent podcast, dated August 6th, 2020 https://www.apmreports.org/episode/2020/08/06/what-the-words-say and Mr. Weaver’s January 29, 2020 webinar https://www.youtube.com/watch?v=U9J295pPslc&t=1s   Taken from Ms. Hanford’s August podcast, “Reading is essential – not just for school success, but for life. When children have trouble learning to read, it can kick off a devastating downward spiral. Struggling readers are more likely to report feeling sad, lonely, angry, anxious and depressed. Their poor reading skills make it hard for them to keep up in other subject areas. They’re more likely to have behavior problems, to drop out of school and to end up in the criminal justice system”.   In Mr. Weaver’s January 29, 2020 webinar, https://www.youtube.com/watch?v=U9J295pPslc&t=1s, he addresses grim statistics for our children of color here in California. For example, presently, 14% of black children, and 15% of brown children here in Oakland can read on grade level, and black students are half as likely to be assigned to gifted programs in math and reading, as their white peers. Mr. Weaver reminds us that parents of children of color, want the same three things all parents want for their children when they attend school; To Be Safe To Learn to Read To Be Career or College Ready | Not actionable. |
| 5h | Weir (continued) | N/A | Strong reading skills are the foundation of all academic success, yet as a group African American student score lower on standardized tests than white students. African American students suffer disproportionately, when not taught to read using evidence-based practices that leverage research. Racism and bias within school systems create a tolerance for failure. Social justice demands that we provide African American children the same opportunities to achieve academic success as other children. America’s present approach to reading instruction is having a devastating impact on Black, Hispanic and American Indian children. Unfortunately, more of the same will yield the same results for struggling readers and children of color here in California.   Thirdly, I would like to address an action plan and define what that means for our on the ground educators. Their professional knowledge and the resources they are given to complete the jobs they are asked to do is, “Where the rubber meets the road.” We know that presently, there is a disconnection between what we have learned from research on reading, language, and learning, and what happens in the classroom. | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 5i | Weir (continued) | N/A | Can you make a difference for our students by extending well-meaning statements to include specifics of how that would look for classroom practice? In so doing, you are merging research with practice.   Please specifically address the following educational state-wide needs;  1. Approved professional development for the state of California  Presently, the National Quality of Teacher Education is painting a dim picture of our teacher training programs. It is important to address this need on two fronts. The first is at the university level, and the second is at the school and district level. Future and present teachers need to have course work that is based on Effective Reading Instruction Principles. The Knowledge and Practice Standards (IDA) provide a strong outline for what teachers of reading need to know and be able to do. This spring, 2020, the state of Colorado released a list of professional development courses that meet the requirements of evidence-based training in teaching reading. The California Comprehensive Literacy Grant would give our state this same opportunity. As we lead the nation in providing research-based literacy instruction for all educators, we can change the state of California’s present trajectory.  https://www.cde.state.co.us/coloradoliteracy/readactprofessionaldevelopmentevidenceteachertraining | Not recommended. The California Literacy Teaching Performance Expectations, adopted by the Commission on Teacher Credentialing in November 2019, will be added to the Comprehensive and Integrated Literacy Model section. Professional learning aligned to research-based practices is included in the Comprehensive and Integrated Literacy Model. |
| 5j | Weir (continued) | N/A | 2. Reading Programs Based on the Science of Reading Your draft addresses the need for an evidence-based approach to reading and language instruction. The states of Colorado and Arkansas have addressed this need by providing a list of approved reading programs which have passed a rigorous review, and include the elements of effective instruction.   Here is the Colorado link to reading curriculum backed by science - https://co.chalkbeat.org/2020/4/23/21233583/colorado-wants-schools-to-   Here is the Arkansas link to a list of approved science of reading curriculum -  ttp://dese.ade.arkansas.gov/divisions/learning-services/curriculum-  3. Statewide Universal Screeners What are the universal screeners you would like to see implemented in the state of California to ensure our marginalized populations, as described by Ms. Emily Hanford and Mr. Kareem Weaver are served? How do they include information that teachers can use to effectively address our diversified learners? These screeners need to be valid and reliable, able to identify students at risk and provide diagnostic information to help teachers tailor instruction for their students. Can grant money be used to help with their implementation? | Not actionable. The SBE adopts instructional materials. Universal screeners are addressed in the SLP and may be implemented by Local Literacy Lead Agencies. |
| 5k | Weir (continued) | N/A | We have a large, diverse, and multi-cultural state, and without addressing explicit details of how we plan to support our students and our educators, all the best intentions for providing a quality literacy plan is lost in the mire. Never has it been more important than today, to focus our attention on instruction that makes a difference.   Thank you again for the countless hours you have spent and will be spending to ensure excellent literacy practices are in place for all California students. If you have any questions about my suggestions, or if I can assist in the process, please feel free to contact me. Sincerely,  Diana Weir Diana Weir, M. of Ed in Reading Instruction  CC: Governor Gavin Newsom Tony Thurmond, California State Superintendent of Education  Mr. Bill Lucia, President and CEO of Ed Voice  Diana Weir P.O. Box 1211 Mendocino, Ca. 95460 dianaweir@mcn.org  (707) 937-2012  State Superintendent Tony Thurmond 1430 N. Street Sacramento, Ca. 95814 | Not actionable. |
| 5l | Weir (continued) | N/A | Dear Mr. Thurmond,  I am writing to share a copy of the feedback I provided on October 26th, 2020 with the State Department of Education’s “California Comprehensive Literacy Team.” At this time, they are asking for public responses to their initial draft plan. This publication and its suggestions have the potential to make a positive difference in the literacy development for millions of children in California. On the other hand, if effective reading instruction is not defined, the inevitable result will be the continuation of poor state-wide reading scores. My hope in giving feedback to the team is that California will join other states, in using the most current research to inform teaching in our classrooms.   As a reading specialist, literacy coach, and retired university professor, I am committed to ensuring both students and teachers have success in the classroom. To that end, I have attached my response to the team for their review, and for your consideration.   In my feedback letter to the team, I address three major literacy needs in our state • A commitment to structured literacy, as we meet the needs of all learners  • Equity and social justice for California’s children of color • An explicit action plan | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 5m | Weir (continued) |  | In December of 2019, the New York Times published the article, “There Is a Right Way to Teach Reading, and Mississippi Knows It.” Mississippi was the only state in 2019 to post significant gains on the fourth-grade reading test, as measured by the National Assessment of Educational Progress (NAEP). Mississippi presently ranks 47th nationally per pupil state expenditures at $8,419.00. By comparison California’s national rank is 27th presently, spending $11,588.00 per student expenditures. Mississippi’s success is attributed to a state-wide effort, begun in 2013, with the goal of helping teachers apply the science of reading to their classroom practices.  https://www.nytimes.com/2019/12/05/opinion/mississippi-schools-naep.html .   Thank you for your attention to my letter, and to the education of California’s children.  Sincerely,   Diana Weir   Enc: California Comprehensive Literacy Team Response Letter  CC: Comprehensive Literacy Team Governor Gavin Newsom  Mr. Bill Lucia, President and CEO of Edvoice | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 6 | Hernandez | N/A | Dear Instructional Quality Commission Members, On behalf of Californians Together, a coalition of 25 parent, professional, and civil rights organizations focused on improving policy and practice for English learners, we are pleased to submit our input to the Proposed State Literacy Plan as public comment. Literacy is key to success for all students and is especially critical for English learners as they are often learning to read and reading to learn in a second language. Many of our coalition and network members had the good fortune to serve on the Superintendent’s Literacy Transition Team, and we are pleased to see their input reflected in this draft. The potential for this new State Literacy Plan to help define practice to accelerate language and literacy is very exciting, and we are committed to working with you on this important initiative. General Comments: The following are highlights from the plan that we consider important and are grateful for their inclusion: • The strong focus on the ELA/ELD Framework as a central guide to the plan, • The frame of educational equity and addressing systemic racism, • Acknowledgement of the diversity of California’s student population and citing of the Equity Chapter from the ELA/ELD framework, | Not actionable. |
| 6 | Hernandez | N/A | **(continued)**  Inclusion of children in Early Education Programs and the Early Learning Preschool Foundations, • The section on integrated and designated ELD, • Strong section on the EL Roadmap and EDGE, and • Uplifting the Seal of Biliteracy | Not actionable. |
| 7a | Ramos Harris | N/A | Dear Instructional Quality Commission Members, Thank you for the opportunity to comment on the draft State Literacy Plan (SLP). As advocacy organizations dedicated to ensuring educational equity, we appreciate the Plan’s strong focus on equity, asset-based language on the diversity of California’s children/students/families and the state’s vision for biliteracy/bilingualism, and the specific inclusion of birth to age 5. However because the essential themes of birth to age 5 and biliteracy are not fully woven in throughout the Plan, it misses the opportunity to maximize the power of early childhood and biliteracy to build a strong foundation for literacy development for all of California’s children. The following feedback has been informed by a collective of early childhood and dual language learner (DLL) advocates from across the state. The feedback below begins with highlights of themes and questions that we recommend the Plan address and the section below that provides more detailed input connected to specific sections in the Plan. | Not actionable. |
| 7b | Ramos Harris (continued) | N/A | 1. It is imperative that this Plan comprehensively include, and accurately reflect, the mixed delivery system of early learning and care (ELC) for birth to age 5. If we are planning a SLP that meaningfully includes young children, it will be important to be intentional about how the whole mixed delivery system of 0-5 be included to inform local plans. Is this plan only mentioning state subsidized programs? How about Head Start programs run by counties of education? How about other early learning settings across the state? 2. It is critical that this Plan meaningfully support and lead cohesion and articulation between ELC and early elementary/K-12. There is no recognition in the document that they are two different systems that need differentiated, developmentally appropriate support, and the Plan lacks a strategy for connecting the two systems in meaningful ways. This is evident throughout, but especially so in the section on professional development and support for educators, which does not mention ELC. | Recommended. Language will be added regarding how the SLP can be used across the early childhood education mixed delivery system. Language will be added regarding the importance of collaboration and alignment between early childhood education and K–12 systems. |
| 7c | Ramos Harris (continued) | 7 | 3. In the list of resources mentioned to support literacy/biliteracy, we need to ensure the mentioned resources are updated with the latest research and practice. For example, the Preschool Learning Foundations were written at a time when there was greater focus on rapid English acquisition over the importance of continued home language development. This must be updated with recent research that better supports DLL children and biliteracy development, such as the National Academies of Sciences, Engineering, and Medicine (NASEM) report (2017)1. 4. We appreciate that biliteracy is included in this Plan. However, mention of biliteracy appears in silos and should be woven throughout the entire document and build on the asset-based language around California’s diverse students, starting from the aim in the Preface (pg.7). DLLs make up 60% of children Birth to Age 5 in California2. This is not accurately represented in the diversity data of the Plan, as it does not accurately reflect the entire mixed delivery system of ELC. 5. As the local plans will be built on review of data available for districts, there is a great need for collection of nuanced ELC data to identify and measure progress for DLLs in close partnerships with families and early childhood educators/experts. This also includes investment in observational assessments that are age- and developmentally appropriate in multiple languages and local capacity building around linguistically and culturally competent assessors. | Recommended. Language from the CA Education for a Global Economy Initiative and the *EL Roadmap* regarding primary language development will be added to the Birth to Age Five section. Information and guidance regarding the ELD DRDP and DRDP assessors will also be included. |
| 8a | Graves | N/A | To Whom It May Concern: The California Association for Parent-Child Advocacy is statewide, all-volunteer organization of attorneys, parents, and professionals who work on behalf of students with disabilities. We analyze and comment on policies that affect the rights of students with disabilities and advocate for policies that protect those rights. Most recently, CAPCA members from across the state helped to defeat SB 614, a bill that would have discontinued the Reading Instruction Competence Test and greatly weakened California’s requirements that aim to foster effective, science-based reading instruction. The draft of the California Comprehensive State Literacy Plan does not endorse the worst features of the bid by powerful stakeholders—chiefly administrators, some professors of education, and some teachers’ organizations—to water down requirements for literacy instruction. However, it also does nothing meaningful to counter the ways in which those powerful stakeholders have already undermined literacy instruction in California, and indeed gives them new channels for doing so, while depriving parents and other advocates of research-based reading instruction of tools for accountability. The document needs to be more prescriptive and less suggestive. The rhetoric of gradual improvement is dismaying given the huge gap between what is known and what is being done. Our specific concerns include the following: | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 8b | Graves (continued) | N/A | 1) The omission of the 1999 California Reading Initiative for Special Education from the list of guiding documents is disturbing (https://www.bartonreading.com/pdf/ca\_reading\_initiative.pdf). That document has long been a resource for parents and advocates seeking to press school districts to provide meaningful, standards-based reading instruction to students with disabilities. While the California Dyslexia Guidelines contain some important guidance as to the importance of multisensory instruction for some students, the older document speaks very powerfully to the problem that many students with disabilities experience: being given less and less coherent, comprehensive reading instruction, rather than the additional instruction they need. Students with autism, intellectual disability and even specific learning disabilities have often been relegated to sight word instruction, or educators have assumed that reading is either not “functional” for them or is beyond their capacity. The Reading Initiative speaks powerfully to the need to offer “early” reading instruction to students who need it regardless of age: “Students who do not master necessary reading skills in the early grades must have adequate instructional time in reading, no matter what grade they are in.” It is important to continue to embrace—and start more fully to implement—the California Reading Initiative, including its assurances of equity for students with disabilities. | Not actionable. Building capacity for supporting students struggling with reading, including students with disabilities, is identified as a statewide literacy priority. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 8c | Graves (continued) | 45 | 2) Performance language skills in speaking and listening underlie mastery of the “academic” tasks of writing and reading. This document contains a misleading claim at p. 45 that “[t]he human brain is ‘hard-wired to learn language, a process quite similar in all children. Yet children differ a good deal as to when they use their first words, start to combine words into sentences, and use complex sentence forms to communicate meaning.” While that is true of most humans, some have disabilities in “hard-wiring” that require different approaches to language learning, for instance, Comprehensive Behavioral Treatment for Young Children With Autism in which language skills are specifically built up with reinforcement procedure, as well as a variety of techniques to address language disorders. Even among typical learners, ability to learn a second language varies tremendously, with some students learning “naturally” through immersion and others needing systematic instruction. Differences in language development are not merely about timing or about differing degrees of exposure to language. | Not actionable. |
| 8d | Graves (continued) | 79 | 3) Inclusion of the term “Structured literacy” is welcome, but the reference in this document (p. 79) is confusing and inaccurate. Structured literacy implies direct, systematic instruction in phonemic awareness, phonics, vocabulary development, fluency and comprehension. “Structured literacy” is not just for students with dyslexia. It provides a solid foundation in reading for all students. It is typically contrasted with whole language approaches assuming that reading is natural and that decoding will “come” if students are exposed to literature, and with “balanced literacy” approaches that their own advocates are starting to see requiring “rebalancing” towards explicit instruction in foundational skills. Multisensory instruction is a distinctive component that students with dyslexia frequently need. | Not actionable. CLSD activities will be aligned to the *ELA/ELD Framework* and other state guidance and policies and will be evidence-based. |
| 8e | Graves (continued) | 70 | 4) The discussion of “foundational” reading skills is flawed and unpersuasive. Rather than making a case that will persuade stakeholders that they should and must adopt a science of reading instruction which is gaining ground outside of California even as it is attacked here, the draft plan offers counterintuitive, and incorrect, accounts of what that instruction seeks to accomplish--descriptions that are likelier to promote skepticism than adoption.  The draft’s handling of phonemic awareness is problematic. The draft claims at p. 70 that “[i]t is essential that children develop phonological awareness early in the elementary school years, with the goal of attaining phonemic awareness, the most difficult and important level, by the end of grade one, if not well before.” In fact, as the draft points out elsewhere, early childhood and preschool activities target phonological and to some extent phonemic awareness. If a child does not “attain[]” phonemic awareness until the end of first grade, two years of phonics instruction will have been largely wasted. The draft indicates that “[c]hildren are best positioned to understand the logic of and gain independence with the English written system when they are aware that spoken language consists of phonemes (p. 70).” Perhaps teaching children about phonemes is useful, but what really matters is whether children are able to perceive the distinct sounds in words. To the extent that teachers abandon solid phonemic awareness activities or synthetic phonics instruction (showing students how to combine sounds represented by letters into words), in favor of analysis of language and the relationship between listening and reading, they are likely to be less, not more, effective as teachers. | Not actionable. As noted in the SLP and more extensively in the *ELA/ELD Framework*, phonemic awareness should be attained by the end of grade one, if not well before and is addressed in the Birth to Age Five sections. |
| 8f | Graves (continued) | 71 | ii. For phonics, the draft asserts that “[a]fter a word is decoded several times, this sound-symbol-meaning package becomes established. In subsequent encounters with the word in print, the learner recognizes and understands the word at a glance. It is now a sight word (p. 71).” Though purporting to provide a general explanation, this actually describes reading acquisition from the point of view of a quick, or at least average, learner. It provides no guidance for understanding what may go wrong; for instance, many students with dyslexia learn to decode, but do not form stable orthographic representations of words, or have word retrieval difficulties. Many students have to decode words over and over, undermining fluency and comprehension. That is one of the reasons it matters which multisensory approaches are employed. Inaccurate general statements about the science of reading make it harder to understand when things do not go well, and harder to help. iii. It is important to stress the regularity of English spelling, and the importance of learning to decode. But it is confusing to refer to “sight words” only in the context of decodable words becoming “sight words” after a few episodes of sounding them out. English contains many words which must be memorized. There are research-based methods for helping children do that. Teachers need to understand that advocates of “phonics” are aware of its limits; anyone who does not understand that the science of reading recognizes irregularly spelled words is unlikely to think that science can improve their teaching. | Not recommended. Learning differences in regard to phonological processing is addressed in the Students with Dyslexia section. Phonics is addressed within an integrated approach to foundational skills. |
| 8g | Graves (continued) | 17 | 5) The level of generality in this document’s recommendations, and its links to other materials at an equally high level of generality, greatly reduce its usefulness. There are empirically validated programs for use in general education and in special education. Some school districts have worked with Lindamood-Bell and with the National Institute for Direct Instruction to adopt such programs. As long as California state guidance refuses to identify effective programs, it is unlikely that school districts or teachers will happen to locate and adopt them. It is important to have specific discussions, including parents and their organizations as well as reading experts, about how concretely districts can help students learn. Adopting a program and seeing whether enough children succeed with it is inefficient at best, and does not allow for determination of whether students are learning to read because of, or despite, the programs adopted. In districts where affluent, well-educated parents are able to supplement instruction by their own efforts or hired tutors, over 80% of students are likely to do well regardless of curriculum. Under the guidance in this document—"If less than 80 percent succeed in Tier 1 instruction, schools should engage in close examination of the curriculum and teaching practices and make appropriate adjustments (p. 17)”—poor practices are likely to be retained. | Not recommended. The SLP is not meant to establish new guidance for curriculum and instruction in literacy. Requirements for instructional materials adoptions are established in the California State Constitution, California *Education Code*, and *California Code of Regulations*. The State-Level Activities section details CLSD activities that align with state guidance, utilize evidence-based practices, and the implementation and study of strategies addressing statewide literacy priorities. |
| 8h | Graves (continued) | 70 | 6) The document’s treatment at p. 70 of foundational reading skills after the early years is weaker than guidance that has been provided historically, for instance, in the California Reading Initiative for Special Education. Earlier guidance recognized that students need to be supported in learning to read independently even if are well passed the years in which that would ideally have occurred. This document is mushy: “Achievement of the foundational skills is given high priority in the early years and sufficient priority in later years to meet, as appropriate, the needs of older children and adolescents.” If a middle or high school student, or a young disabled adult in a transition program, cannot read or write, it may well be time-consuming to teach them now, but that must be done, except in extremely rare cases involving profoundly disabled students. As has become clear in the Ella T. litigation and in other matters, https://calmatters.org/education/k-12-education/2020/02/california-literacy-rights-lawsuit-settlement-teaching-students-read/, students reaching high school without basic literacy skills is unfortunately not rare in either general education or special education. | Not actionable. Foundational skills are addressed across the grade levels in the *ELA/ELD Framework*. |
| 8i | Graves (continued) | N/A | 7) The draft’s recommendation that students lacking foundational skills to read independently should nonetheless be taught higher-level reading skills and provided access to literature and subject matter across the curriculum is important, but needs to be fleshed out. Extended instructional time should not just mean delaying graduation; it should include summer programs that aim to boost learning (not just, as is typical in special education, aimed at limiting regression) and after-school programs. California school districts have historically taken a narrow approach to assistive technology, often insisting that it need only be offered if without it, a student’s education falls short of the requirement under federal law to provide a free appropriate public education. It is vital to name the technology and perhaps specific equipment and software, that can provide the access that the report rightly recommends. | Not recommended. The *ELA/ELD Framework* provides more in-depth guidance on extended instructional time and assistive technology. |
| 8j | Graves (continued) | 25–26 | 8) After all the national and state investments in universal design for learning, access to differentiated materials is spotty. It is vital to point districts to UDL resources and stress their importance for students facing language and disability barriers to learning, and the legal risks associated with failure to use readily available materials, rather than simply asking districts to take advantage of them, as this report does (pp. 25-26).  The document needs to identify obstacles to effective instruction in more concrete terms—for instance, failure to teach the science of reading in teacher preparation programs; treatment by too many education students and faculty of the now-suspended RICA as an exam to cram for, with commercial prep materials, and deem useless, rather than as the culmination of important learning in education schools; failure of the TPP accreditation process to ensure competency in reading instruction; etc. | Not recommended. A link is provided to the CAST website and additional resources will be compiled into a resources repository as an outcome of the SLP. The recently adopted Literacy Teaching Performance Expectations will be added to the SLP. |
| 8k | Graves (continued) | 34, 66–67 | 10) The document’s emphasis on differentiation and personalization (e.g. p. 34) combined with failure to identify specific programs, and its and nods towards discredited learning style approaches (pp. 66-67) threaten to encourage incoherent instruction in foundational, and other, reading skills. Marginalized students have often been subjected to demeaning stereotypes. At a stakeholder meeting about legislation affecting foster students that one of us attended, a person who considered herself an ally ridiculed the notion that they should be studying Shakespeare, understandably angering the foster students and former foster students in attendance. Assumptions about what is “relevant” to cultural groups can easily fall into stereotyping and in claiming historically emphasized parts of “the canon” as White even though the Whites teaching and studying in California schools did not create it. Students with autism have been labelled “visual learners” and subjected to minimal, artificial language models. It is often easier for adults to find reading materials that student are willing to read than to motivate them to engage with state standards. While learners vary, what needs to be learned varies much less. There are solid, coherent curricula, that work if and only if they are faithfully implemented. Teachers who are told that they must individualize instruction and differentiate instruction based on their impressions about students’ capacities and cultures are poorly positioned to provide equitable educational opportunities, much less excellent ones. | Not actionable. California guidance documents and policies address more fully the curriculum and instructional strategies highlighted in the SLP. The goal of the activities outlined in the SLP is to support all students to meet age/grade level literacy foundations and content standards and all LEAs to implement state literacy guidance with fidelity by the conclusion of the CLSD grant. |
| 8l | Graves (continued) | 26 | 11) The report needs to confront more honestly and less glibly questions about ability and achievement grouping. If early reading instruction really has to be intellectually challenging for all students at all times, that probably means class-segregated, likely language-separated, and given systemic racism, likely largely racially segregated, classrooms in kindergarten and first grade. “Differentiating” early reading instruction comes with a high social cost. When to “pull out” students with dyslexia for intensive remediation, vs. trying to serve them in general education, is a hard question that cannot be resolved with cliches about students with dyslexia “being” “general education students first” ” who “can be educated in general educational classrooms (p.26.). | Not actionable. More detailed guidance is provided in the *ELA/ELD Framework*. |
| 8m | Graves (continued) | 41 | 12) While attention to bilingual issues is welcome, the notion at p. 41 that “[c]ommunicating in the family’s primary language is essential” applies in some situations, but not all. In some cases, it would be insulting for school district personnel to bring their limited language skills to interactions with parents who are more competent in English than staff are in their “primary” languages. Public schools should foster English language development, and mastery of world languages, for students,, and insofar as it relates to children’s education, for parents as well. Nearly all parents want their children to learn English in school; for students with disabilities who need all the modeling and interaction they can get, as well as help with homework that is in English, that makes it vital for parents to receive support in their own efforts to master English. The notion that it is always necessary to communicate in a family’s “primary” language is disrespectful and diverts attention from real needs of English learners and of parents who actually need competent interpretations in meetings and prompt, accurate translations of documents. CAPCA requests inclusion in stakeholder processes, as we include and work with families and include professionals who have substantial experience with, and knowledge about, reading instruction in California for students with disabilities. Many of us have extensive experience in families where English is not spoken and in families which cannot supplement the instruction they depend on schools to provide. | Not actionable. California *Education Code* and federal law establish requirements regarding translation services for parents and guardians. As noted in the SLP, stakeholders may join the CLSD listserv to stay apprised of program updates and opportunities. |
| 9a | Schlagel | N/A | Thank you for your hard work and energy drafting this Comprehensive State Literacy Plan. All Californians are deeply invested in the education of children and we all agree that we can do a better job for our students in California and I am writing to you as a concerned parent, student advocate, and taxpayer. It was exciting to learn that in 2019, the Office of Elementary and Secondary Education, Department of Education awarded the State of California Department of Education (“State” or “CDE”) a $37.5 M grant to develop a Comprehensive State Literacy Plan (“CSLP”). The stated focus for the grant money included priority to projects that focus on “evidence based family literacy strategies” and “effective interventions while also increasing education options for groups who have traditionally been underserved”. This grant was not limited to projects taking place inside the school setting or school day so that community partnerships could be explored. The grant established 5 priorities: 1) promoting literacy, empowering families in 2) rural communities, 3) students with disabilities, 4) English language learners (“ELL”), and 5) foster care youth by increasing educational choice. The grant also encouraged collaboration between State agencies in order to support students from birth through 12th grade. To accomplish this the grant required a needs assessment and the development of a CSLP. States receiving funding had mandated allocations of 15% for birth to pre‐kindergarten entry, 40% for kindergarten through grade 5, 40% for grade 6 through grade 12. The requirements of this grant present an opportunity to address challenges in our current education system in a bold fundamental way. | Not actionable. |
| 9b | Schlagel (continued) | N/A | The CDE could use existing frameworks to establish goals to tackle access to education, social and racial inequities, deficiencies in teacher knowledge, and build capacity within our school districts. I would like to see the CDE do more with this CSLP in the final presentation.  Promoting Literacy and Empowerment School districts across the State need consensus of expectations and common language. The State has not clearly defined their interpretation of the following: literacy, comprehensive, “evidence based family literacy strategies”, “increase educational options”, and “improve student outcomes”. Local Education Agencies (“LEA”) across the State need to operate from the same set of definitions. This would help to create clearly defined goals and criteria for the State literacy plan. Currently, the goal reads “support all students to meet grade level literacy foundations…with fidelity…” The State should give a clear directive. For example, “As of 2018‐2019, 51.01 % of California’s students meet or exceed literacy standards. Our primary goal is to increase student competency to 85% in 5 years by focusing on teacher training, setting curriculum standards for LEAs, and implementing criteria for LEA literacy consultants. This will allow the State to support all students…” Other objectives include create access for the targeted communities, produce new standards for existing teachers, and develop tools that reduce administrative burdens on teachers and districts. Concrete goals are key to achieving literacy and empowerment. | Recommended. A glossary will be added to the SLP.  Not recommended. Outcomes are established in the SLP Logic Model. Specific benchmarks will be established in the Local Literacy Lead Agencies grant program. |
| 9c | Schlagel (continued) | N/A | Comprehensive and Integrated Literacy Model: Access  In order for this plan to be comprehensive it would need to address the systemic inequalities permeating the existing system. The CSLP states multiple times that “…high quality literacy instruction occurs within the context of inclusive and equitable systems…” which means these are pre‐requisites for this plan to be successful. As drafted, the plan does not provide solutions to make California schools inclusive or equitable. The CSLP could increase equity by developing free training for all teachers in structured literacy, social emotional regulation, creating safe space conversations, providing a list of preapproved curriculum that aligns with the frameworks, eliminating policies that adversely impact the identified populations, and developing projects that support our most vulnerable populations. | Not recommended. Increasing asset-based teaching in schools is identified as statewide literacy priority in the SLP. Social emotional learning is included in the Comprehensive and Integrated Literacy Model, which sets the direction for literacy programs. The SBE adopts instructional materials aligned to the Curriculum Frameworks. |
| 9d | Schlagel (continued) | N/A | One strategy would include supporting the Reading Instruction Competence Assessment (“RICA”). The RICA has been modeled by other states because teacher candidates demonstrate a minimum level of competency in their understanding of the foundational skills to teach reading. Teacher candidate knowledge varies widely, the RICA proves they have the necessary skills to teach reading which improves equity among rural communities, students with disabilities, English language learners (“ELL”), and foster care youth when these skills are used in classrooms. Staffing schools with teachers who do not have this knowledge widens the knowledge gap in our most vulnerable communities. There are many different ways the CSLP can support teacher candidates who have difficulty passing the RICA. Examples include: 1. Offer mentoring programs with reading specialists at the CSU and UC level; 2. Providing free extension classes in direct, explicit, multisensory instruction in the foundations of reading. 3. Subsidize test‐preparation classes for minority candidates who take the RICA; 4. Grants for reading experts to develop online learning modules offered to candidates; 5. Free science of reading preparation classes; 6. Providing fee waivers for low‐income teaching candidates to take RICA; 7. Allowing candidates credit for portions they have passed; they only retake failed portions of the test; | Not recommended. The California Literacy Teaching Performance Expectations, adopted by the Commission on Teacher Credentialing in November 2019, will be added to the Comprehensive and Integrated Literacy Model section. |
| 9d | Schlagel (continued) | N/A | **(continued)**  8. Provide intensive support in the credentialing programs to help these candidates Grants for CSU and UC level to develop RICA specific coursework and make it a graduation requirement | Not recommended. The California Literacy Teaching Performance Expectations, adopted by the Commission on Teacher Credentialing in November 2019, will be added to the Comprehensive and Integrated Literacy Model section. |
| 9e | Schlagel (continued) | N/A | Comprehensive and Integrated Literacy Model: Needs Analysis LEA survey respondents indicated they need assistance creating expertise including onsite literacy teams (which should incorporate structure literacy training), using universal screening to provide students with the appropriate level of instruction, aligning curriculum with ELL/ ELD and Dyslexia guidelines, and providing a culturally diverse curriculum. As written the CSLP can be greatly improved by addressing these specific requests. This cry for help should not be ignored. The expert panel the CDE assembled could develop a program that integrates all of the frameworks, host online classes to provide access to all 977 districts, and build capacity across the State. The CSLP has the potential to develop a “Curriculum Criteria” to establish minimum standards when selecting curriculum. For example, the State of Colorado publishes a list of curriculums authorized to be used in their state1. Many rural communities lack both the resources and the manpower to review the seemingly endless “new” programs being published. A list of pre‐approved programs and a checklist would remove some of the burden from districts and empower them to focus on implementation. Making a curriculum criteria would also give direction to community organizations focused on supporting students with disabilities, English language learners (“ELL”), and foster care youth when they are looking to provide supplemental activities and learning environments. Diversity in curriculum material will not change if the State does not develop criteria. | Not recommended. The SLP addresses local literacy teams, universal screening, and culturally responsive and sustaining pedagogy. State-Level Activities include professional learning opportunities to address statewide literacy priorities. The *ELA/ELD Framework* includes Criteria for Evaluating Instructional Materials for Kindergarten through Grade Eight and the SBE adopts instructional materials aligned to the Curriculum Frameworks. |
| 9f | Schlagel (continued) | N/A | There are 977 school districts in California, more than 306,000 teachers (190,012 are white, 63,380 are Latino, and 11,918 are black), 26,861 school administrators. 167 districts were sampled. African Americans, special needs communities, and other underserved populations have no voice at the local level in many districts. These communities need representation in this process. A State directive can ensure these communities have a voice in the process. As currently written, this document perpetuates a lack of diversity. The background knowledge disparity in early education is another challenge that can be boldly tackled by the CSLP. The CSLP should include free preschool for every child in the State. Free preschool may be the most effective way to build background knowledge that supports students with disabilities, English language learners (“ELL”), and foster care youth. Free preschool would directly support every students’ exposure to a diverse array of toys, students, early teaching, and play which has a direct impact on vocabulary. This would extend the opportunity for literacy to all families beginning at the earliest stages regardless of income. The LEA’s openly admit they need expertise and training. We need a CSLP that helps them. | Not actionable. Opportunities to inform the development of the SLP have been promoted widely across the state and diverse stakeholders have been involved in its development. Free preschool is outside of the scope of the SLP. |
| 9g | Schlagel (continued) | 22 | Comprehensive and Integrated Literacy Model: Frameworks  On page 22 of the CSLP draft …”Student who know how to decode and develop automaticity with an increasing number of words are best positioned to make significant strides in meaning making, language development, effective expression, and content knowledge.” It then stands to reason that the CSLP draft should be focused on developing these “foundational skills” in every student. Yet, the plan does not detail how the State will increase these skills at each of the three groups of students set forth by the funding allocations or their subgroups of rural communities, students with disabilities, English language learners, and foster youth. The California Dyslexia Guidelines describe in detail the most effective methodology for developing foundational skills in 95% of students including ELL students. The article “Pre‐Service Teachers: An Analysis of Reading Instruction in High Needs Districts Dual Language Classrooms”2 suggests that lack of direct, explicit instruction in phonemic awareness, letter sound correspondence, decoding, vocabulary, and vocabulary development may be a significant factor contributing to the low literacy rates in ELL students; they too benefit from direct, explicit, multisensory instruction. Therefore, the 306,000 teachers in California should receive training in structured literacy over the next three years in order to support all students regardless of credential (single discipline or multidisciplinary). The CSLP could offer free structured literacy instruction to all preschool teachers in the state, including private preschool teachers to move all families toward literacy. Additionally, | Not recommended. Foundational skills are addressed across grade levels in the *ELA/ELD Framework*, with which CLSD activities will be aligned in support of all students. Professional learning opportunities addressing the *California Dyslexia Guideline*s will be provided. |
| 9g | Schlagel (continued) | 22 | **(continued)**  the CSLP could propose training to libraries, and community organizations that support rural communities, students with disabilities, English language learners (“ELL”), and foster care youth. | Not recommended. Foundational skills are addressed across grade levels in the *ELA/ELD Framework*, with which CLSD activities will be aligned in support of all students. Professional learning opportunities addressing the *California Dyslexia Guideline*s will be provided. |
| 9h | Schlagel (continued) | N/A | Coordinating efforts to train as many people on structured literacy as described in the California Dyslexia Guidelines is the first step to ensuring the students that receive public education have the fundamental skills they need to open up opportunities.  Comprehensive and Integrated Literacy Model This document has potential to do so much to support rural communities, students with disabilities, English language learners (“ELL”), and foster care youth. FREE PRESCHOOL FOR ALL is essential to California closing the equity gap in education. Teaching structured literacy to all public and private school preschool teachers should be a priority. Developing an approved curriculum list requiring districts to select from it so that all student receive structured literacy as “high quality first instruction” is essential to improving CA. I am not in favor of the CSLP as currently drafted. The CSLP continues to allow LEAs to make up their own rules and criteria instead of giving clear guidance and provide minimum requirements. It does not set standards for LEAs, teachers, or teacher preparation courses. This is not a comprehensive state literacy plan; it’s a reference document. The intent should have been to create a new comprehensive mandate. It is my sincerest hope that this CSLP is reimagined and redrafted. Education creates empowerment. Empowerment makes for a better California. Thank you for your time and energy. Regards, Deberah Schlagel | Not recommended. Professional learning opportunities addressing the *California Dyslexia Guideline*s will be provided. The SLP is not meant to establish new guidance for curriculum and instruction in literacy. |
| 10a | Gustafson Corea | N/A | Thank you for the opportunity to comment on the Draft Comprehensive State Literacy Plan (CSLP). The California Association for Bilingual Education (CABE) is a non-profit organization incorporated in 1976 to promote multilingual/bilingual education and quality educational experiences for all students in California, including the 1.1 million students who are English Learners, and to promote equity and academic achievement for students with diverse cultural, racial, and linguistic backgrounds. We appreciate the acknowledgment in the CSLP of California's student diversity, the focus on educational equity, including the ELA/ELD Framework, the English Learner Roadmap, the State Seal of Biliteracy and the California Practitioners Guide for Educating ELs with Disabilities and their inclusion in the State’s plan. I. General Comments 1. Connection to the LCAP/LCP. The CSLP is essential in improving the literacy level of our students and the literacy rates of California. As stated in the plan, it provides an opportunity to align and integrate resources in order to demonstrate how they are connected and best utilized in a coherent way. However, there is no direct connection to an LEAs LCAP or the LCP. Literacy objectives for LEAs, (especially for student subgroups) their activities, services and resources should be included in the LCAP and LCP in order to ensure accountability regarding literacy. | Not actionable. The State Priorities established in the LCFF legislation are included in the Comprehensive and Integrated Literacy Model to illustrate how local literacy programs can leverage LCFF and the LCAP to support comprehensive and integrated programs. |
| 10b | Gustafson Corea (continued) | N/A | 2. State Vision The California Policy Center found that “In California, 25 percent of the state’s 6 million students are unable to perform basic reading skills.” (The Literacy Crisis, Larry Sand, April 18, 2017). The 2019 National Assessment of Education Progress show that only 32% of fourth graders are reading proficiently. There is a literacy crisis in California. The CSLP should include statements regarding California’s vision and goals with respect to literacy. Where are we now and where should we be in 5, 10 or 15 years should be identified and included. Additionally, the vision of biliteracy for all students and its associated goals, should be clear and included in the plan as well. 3. Closing Opportunity Gaps: Although reading by third grade alone will not ensure success, research shows that children who are not reading proficiently by third grade are four times more likely than proficient readers to drop out of high school (Hernandez 2012). Reading skills are essential for middle and high school success. Providing opportunities for our students who are from families of low economic status, or who are students with special needs or EL students to achieve literacy are critical. Specific goals should be established or identified for literacy outcomes, with a focus on our most vulnerable students and dual language learners. | Not actionable. Outcomes are listed in the SLP Logic Model and SLP goals are stated in Step 1. Specific benchmarks will be established in the Local Literacy Lead Agency grant programs for the students being directly served. |
| 10c | Gustafson Corea (continued) | N/A | 4. Literacy Instruction support of students in dual language/bilingual programs The CSLP should ensure that literacy instruction and supports are appropriate for students in dual language/bilingual programs and ensure these students will connect with content through strategies that build on their primary language. 5. Assessments Assessments, formative assessments, and support interventions for the purpose of attaining literacy and informing instruction should be appropriate for English learners and students in dual language/bilingual programs. 6. California Dyslexia Guidelines & Practitioner’s Guide for ELs with Disabilities Including the California Dyslexia Guidelines and the Practitioners Guide for ELs with disabilities in the CSLB is timely and is greatly appreciated. Both educators and students will benefit from these guidelines and guidance. However, the CSLP must ensure the use of the five key themes (Meaning Making, Effective Expression, Foundational Skills, Content Knowledge, and Language Development) and ELD instruction contained in the ELD Framework, as well, for a robust and comprehensive instructional program in ELA/literacy. These Five Themes of ELA/ELD literacy and ELD instruction must be emphasized as well, not just foundational skills. | Recommended. Biliteracy programs will be added to the SLP Logic Model Activities and language will be added to the Introduction regarding biliteracy and primary language development. Biliteracy assessment is addressed in the Assessment Systems section, but biliteracy resources, such as the *Common Core en Español* and the *Spanish Language Development Standards* will be added. Developing capacity to teach foundational skills has been identified as a statewide priority, but language will be |
| 10c | Gustafson Corea (continued) | N/A | **(continued)** | **(continued)**  strengthened to ensure activities align with the comprehensive model promoted in the *ELA/ELD Framework*. |
| 10d | Gustafson Corea (continued) | N/A | Consider including a “Language Processing and Disabilities Section” as recommended by Californians Together under which Dyslexia and other disabilities connected to reading can be included and elucidated upon.  7. Professional Learning A stronger statement should be included in the “Professional Learning Opportunities” stating these opportunities will target students struggling to read or not meeting LEA specific goals and objective and that the professional opportunities will be provided and appropriate for educators of biliteracy programs. We thank you for the opportunity to comment on this very significant matter that has long term consequences for all of our students. CABE stands ready to assist and serve as a resource in this endeavor. | Not recommended. The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. Professional learning opportunities will address statewide literacy priorities, which includes supporting students struggling with reading and biliteracy programs. |
| 11a | DePole | N/A | To Whom It May Concern: The purpose of the Comprehensive Literacy State Development Grant is to improve the literacy outcomes for students who have traditionally been underserved. Disadvantaged children, including children living in poverty, English learners, children with disabilities, and foster youth are named as priority groups for the grant. The State Literacy Plan (SLP) draft fails in its mission to offer coherent guidance to meaningfully support these students in California public schools. The SLP draft references many literacy documents, including the California Dyslexia Guidelines, but fails to provide a coherent description of evidence-based reading and writing instruction that adheres to the California Dyslexia Guidelines and aligns with the state guidance documents. The SLP draft fails to adequately address the critical importance of foundational reading skills and perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon the primary acquisition of foundational skills. | Not actionable. The SLP is not meant to establish new guidance for curriculum and instruction in literacy. CLSD activities will align to the *California Dyslexia Guidelines* and other state guidance documents and policies. Increasing capacity to teach foundational skills is identified as a statewide priority and the importance of foundational skills is noted in the Comprehensive and Integrated Literacy Model. |
| 11b | DePole (continued) | N/A | The Federal Register for the grant award required the SLP to reflect the priorities that were identified during the comprehensive statewide Needs Assessment, however the SLP draft fails to do so. Even though 64% of LEAs reported on the Needs Assessment that they are NOT doing an adequate job of incorporating Structured Literacy instruction (as defined in the IDA Knowledge & Practice Standards for Teachers of Reading) into Tier 1 instruction (and Tiers 2 and 3), “Structured Literacy” is mentioned only once in the 101 page the document. The highly explicit teaching characteristic of Structured Literacy is effective for students at risk in literacy for a variety of reasons, such as those from low-income backgrounds or English learners (Denton et al., 2010; Rivera, Moughamian, Lesaux, & Francis, 2008). Structured Literacy is effective for all students and is essential for students showing signs of dyslexia. As such, Structured Literacy needs to be named, explained, and prioritized in the SLP in order to address this identified Needs Assessment deficit. (See A2, in the attached Appendix, taken from Compilation of Needs Assessment Data)  In addition, 66% of LEAs acknowledged they are NOT early identifying struggling readers through the use of reliable and validated universal screening. Despite this data, the SLP draft places little emphasis on early universal screening for characteristics of dyslexia. If the SLP is to be effective in leading to improvement in supporting California’s most vulnerable students, then guidance for screening students for early signs of reading difficulty and providing access to Structured Literacy across tiers of support should be prioritized. (See B2, in the attached Appendix, taken from Compilation of Needs Assessment Data) | Not actionable. CLSD activities will be aligned to the guidance provided in the *ELA/ELD Framework* and the *California Dyslexia Guideline*s, which addresses structured literacy and universal screening. |
| 11c | DePole (continued) | N/A | According to the self-reported Needs Assessment data, 85% of LEAs acknowledged they need support implementing the Dyslexia Guidelines, yet clear guidance for helping LEAs do so is largely absent from the SLP draft. (See C2, in the attached Appendix, taken from Compilation of Needs Assessment Data.) Not only does the SLP fail to offer meaningful guidance towards implementation of the Dyslexia Guidelines, it makes no mention of the California Dyslexia Initiative (CDI). California is investing in a statewide effort to build upon the California Dyslexia Guidelines and to disseminate the knowledge and information of best practices throughout the statewide system of support to ensure existing research and available resources lead to improved outcomes for students with dyslexia and other specific learning disabilities. The goals of the CDI fall in line with the purpose of the SLP and should at least be referenced in the SLP document. The deficiencies of the SLP draft will have long-lasting consequences in the lives of California’s most vulnerable students. It will not achieve the purpose of the federal grant, to help our state’s most disadvantaged students, and will instead exacerbate inequity. We, the signers of this letter, do not support the SLP draft. | Not recommended. CLSD activities, including the Local Literacy Lead Agencies grant, professional learning opportunities, and the resources repository, will support local implementation of the *California Dyslexia Guidelines*. |
| 12a | Boyd | N/A | On behalf of the California Teachers Association (CTA), I am submitting our response to the draft of the Comprehensive State Literacy Plan (CSLP). Thank you for providing an opportunity for public comments and recommendations to this important document that will help guide school districts in securing some funding for developing a quality literacy plan for their districts. I commend the California Department of Education (CDE) for developing a statewide literacy plan that is inclusive of birth to high school graduation. This five-year competitive grant benefits students who have been traditionally underserved, such as students who are disadvantaged, students on free and reduced lunch, students with special needs, English Learners, foster youth, and homeless students. As a kindergarten teacher, I know first-hand how integral early learning is to the development of our students. The tools they learn to use during these beginning years will provide lifelong benefits to their success. | Not actionable. |
| 12b | Boyd (continued) | 8 | CTA’s input on the CSLP was reviewed by eight committees of our policymaking body, the State Council of Education. There seems to be a prevailing perception that the document is sparse in some areas. If this document is meant to guide school districts on writing their grant proposal, we understand the generalities. However, CTA knows that if explanations of concepts or definitions of terminology are not provided, districts are left to decipher important information. For example, the Executive Summary on page 8 could use some transitional statements that would clearly explain the purpose for this guide. After the first paragraph on page 8, we suggest the following transition sentence:  “We will start with a presentation of the Comprehensive and Integrated Literacy Model and explain the purpose for using the model as a guide for Local Education Agencies (LEAs) to consider in planning their grant proposals.”  The next transition needs to introduce the State Literacy Plan (SLP) Continuous Improvement Process on page 8 with a beginning sentence such as, “Once LEAs understand the design of the SLP, the next section will connect the Continuous Improvement with the SLP”. The rest of CTA’s comments which is composed of the combined input from the eight policymaking committees is presented for your consideration. | Recommended. The Executive Summary will be revised to better explain the purposes of the SLP and its contents. |
| 12c | Boyd  (continued) | N/A | Multi-Tiered System of Support (MTSS)  The Multi-Tiered System of Support (MTSS) provides a framework that is a student-centered approach to addressing the learning needs of the students. MTSS is the cornerstone of the SLP; integrating the various literacy components in the SLP through the state’s standards, assessments, guidance, and resources. As important as this seems, CTA feels that more guidance and explanation of each of the Tiers of MTSS is necessary for deeper application of MTSS. Following the general explanation of MTSS, we feel that the template only goes as far as explaining how MTSS works within the status quo. | Not recommended. As noted in the SLP, more detailed information regarding MTSS in the context of literacy programs is available in the *ELA/ELD Framework*. |
| 12d | Boyd (continued) | 17, 18 | The guide needs to explain that schools in continuous improvement may have already entered into Tier 2 or 3 and there might be a higher percentage of students in Tiers 2 and 3 relying on supplemental and intensive supports to scaffold their learning in Tier I. The mention of a deficit, “If less than 80 percent succeed in Tier I instruction…” on page 17, paragraph 3, last sentence, puts continuous improvement schools under strict measures that are not aligned to our state accountability system.. The deficit is also mentioned on page 18, first paragraph second sentence, “Generally, no more than 15 percent of students receiving support of this level because Tier I, first teaching meets the needs of individual learners.” In addition, the second paragraph, second sentence on page 18 states in Tier 3, “It is necessary for very few students, approximately five percent” to receive intensive intervention. These statements with specific percentages are generalizations provide unrealistic markers that are misaligned to our accountability system. The reality is given the status of some schools designated for additional support, the MTSS triangle may be inverted where students may be spending more time with supplemental or intensive supports. This section of the guide fails to point out this reality. We recommend deleting all of the percentages and providing greater specificity on the application of the tiers would provide more useful guidance on MTSS.  There also seems to be a section that is out of order in this section. MTSS talks about Best First Teaching. CTA is wondering if the Supporting Best First Teaching on pages 29-30 should be next after the MTSS section. We think this adjustment will create a better flow in laying the groundwork for leading into a more coherent explanation of the supports and resources from the CDE. | Not recommended. The guidance for MTSS is drawn from the *ELA/ELD Framework* and is not binding on LEAs. MTSS is provided as a framework and is not meant to establish state accountability measures. The Best First Instruction section provides information regarding state guidance documents intended to be leveraged as Tier 1 resources to support all students to meet literacy objectives. It is at the center of the Comprehensive and Integrated Literacy Model. All resources supporting best first instruction are described in the following sections. |
| 12e | Boyd (continued) | 31 | Well-Prepared and Supported Teachers and Leaders  Starting on page 37 about a Well-Prepared and Supported Teachers and Leaders, CTA notes thatthe plan only parenthetically identifies teachers as leaders of professional learning. Teacher-led professional development belongs in this section as an opportunity to promote equity and access for teachers to learn from each other about literacy pedagogy. The statewide Instructional Leadership Corps project is an example of teacher-led or educator-led professional development. In several studies on the Instructional Leadership Corps conducted by Darling Hammond, Lotan, and Burns from the Learning Policy Institute, the project which is in its seventh year, includes teams of educators providing ongoing professional development to peers in their own districts or regions. Learning is not a top down, one-time event; it is an ongoing recursive process that deepens the skills for all educators. In another survey from the Center for the Future of Teaching and Learning, teachers say that they want to learn from their peers. We want to emphasize that the critical role of teachers as leaders is evidenced in the following ways:   * Teachers as co-creators of professional learning programs at the state, county, LEA, and site levels. * Teachers as the leaders of professional learning, including instructional coaching. * Teachers as critical sources and evaluators of data to determine the effectiveness of professional learning programs or initiatives and necessary steps for continuous improvement. | Not recommended.  One of the purposes of the SLP is connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. Professional learning partners listed in the SLP constitute state infrastructure for professional learning. |
| 12e | Boyd (continued) | 31 | **(continued)**  We suggest that the SLP add information on teacher-led professional learning and more specifically, information on the Instructional Leadership Corps in this section on the Promoting Equitable Access to Teachers or in the Professional Learning section on page 38. | See above. |
| 12f | Boyd (continued) | 25 | Transitional Kindergarten  Transitional Kindergarten on page 25 needs to provide more information on safeguarding and affirming the foundational standards for pre-school and standards for transitional kindergarten. This section needs to specifically state that there is a distinct difference between pre-school, TK and K, and literacy components are different among the three groups. Applying kindergarten standards and curriculum in a TK environment may not be developmentally appropriate. TK students do not learn in the same manner as kindergarten or first grade students. This section does not specify the differences. We recommend that educators need to be able to see a clear delineation between pre-school foundations and the Common Core State Standards. We recognize that Chapter 3 of the ELA/ELD Framework includes guidance and pedagogy for TK, yet, there still needs to be specific examples on meeting the components in a developmentally appropriate manner. | Not recommended. As noted in the SLP, the *Transitional Kindergarten Implementation Guide* and the *ELA/ELD Framework* provide extensive guidance on transitional kindergarten program design, curriculum, and instruction. |
| 12g | Boyd (continued) | 28, 31 | English Learners  English Learners are coming from different countries with multiple languages. Their cultures and language should be taken into consideration and supported to make a smooth transition to their new environment. Primary language support is extremely critical to their learning and self-efficacy. Additional staffing is also integral in providing greater learning opportunities for students in the form of one-on-one and small group instruction. Resources in the form of funding for more paraprofessionals to support our English Learners in integral to a successful literacy program.  Assessments of English Learners is discussed in Paragraphs 1 and 2 on page 28. While CTA understands that state and federal law require assessment of students whose primary language is other than English, they must be assessed for English proficiency. CTA suggests that all other non-mandated assessments should be suspended for English Learners. These assessments do not currently reflect their learning at this point.  We recommend that this document mention some problems with reclassifying students during this pandemic crisis and that it might take longer to identify English Learners with disabilities, especially the non-English speakers.  Regarding the English Learner Roadmap on page 31, CTA is pleased to see it is included in this document. We hope that there will be more guidance in future resources that provide specifical pedagogical and instructional practices for how to use and implement the roadmap to support instruction for our English Learners. | Not recommended. The SLP is not meant to establish new guidance for curriculum and instruction in literacy. Building school capacity for effective literacy and English language instruction for English learners, including opportunities to develop biliteracy and primary language instruction whenever possible, has been identified as a statewide literacy priority in the SLP. The State-Level Activities section details how CLSD activities will address statewide literacy priorities. |
| 12h | Boyd (continued) | 32, 33 | The California Education for a Global Economy Initiative on Page 32 mentions the passage of Proposition 58 without providing a thorough explanation of the options to provide language acquisition for all students. CTA feels there are important options that parents need to know about to make the appropriate choices for their children. We recommend the choices that parents have should be further explained in this section. At a minimum, this document should reference the FAQs about the implementation of Proposition 58 which expands language acquisition options for students and their families.  On page 33 under the first paragraph, line 2, the SLP uses the term “admirable” to describe having fluency in more than one language. We recommend changing it to “valuable”.  Under the heading of Content Knowledge on page 73 in Step 3: Plan for Improvement, the descriptor of content knowledge adding or contributing to the development of language is more imperative for English Learners. Teachers who are not English Language Arts (ELA) teachers need additional training in understanding literacy as it applies to other content. We suggest that this section include professional development as a key component in assisting teachers, as well as administrators in becoming proficient in the academic vocabulary associated with other content areas besides ELA. | Recommended. Information regarding biliteracy will be added to the Introduction and the California Education for a Global Economy Initiative Frequently Asked Questions will be added to this section.  Not recommended. Developing fluency in more than one language is described as being valuable in this section. Building teacher capacity across disciplines for literacy instruction is identified as a statewide literacy priority and will be addressed through CLSD grant activities. |
| 12i | Boyd (continued) | N/A | Students with Special Needs  CTA appreciates the mentioning of the 2019 California Practitioner’s Guide for Educating English Learners with Disabilities which will help teachers with effective assessment practices.  CTA notes that the SLP placed a lot of emphasis on dyslexia without mentioning or providing additional background on other related reading disabilities. While it is commendable that the CDE has developed a useful and informative guide for dyslexia, we suggest the SLP also balance its resources and tools to help educators understand associated disabilities that affect reading proficiency. Other possible disabilities include phonological deficit, processing deficit, and comprehension deficit.  Throughout the document, there needs to be more information about how children with special needs will benefit from the literacy program. There is a need for all teachers to benefit from Professional Development on how to apply literacy instruction for their students. Teachers of special needs students will need materials to help/assist their students. | Not recommended. The statewide literacy priorities include supporting students with dyslexia because this was identified as a statewide need and CLSD activities are intended to build expertise with specific strategies. The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 12j | Boyd (continued) | 33 | Asset-Based Pedagogies  On page 33, while the SLP talks about asset-based pedagogies, we think the first sentence implies only schools and districts with culturally, linguistically, and diverse populations need to examine their beliefs and attitudes toward students and their families when it comes to making decisions about literacy. Schools that meet the requirements for free and reduced lunch may be perceived as schools with an achievement gap or a deficit, but affluent schools may also have deficits acknowledging their privilege and/or entitlement.  Again, CTA feels this section is sparse on content. As important as this document is for schools and district teaching the neediest students, more time should be spent on preparing the school community to understand asset-based pedagogy. Concurrently, there is the concept of strength-based learning and growth mindset that is directly related to asset-based teaching.  This section should be more than the academics of asset-based teaching and learning. The driving factor is about the empathy that the teachers and administrators have for the students and their families. For too long schools in some type of heightened level of assistance are viewed as having “challenges” which is the code word for deficits rather than looking for the strengths to build on. We present this chart from the University of Memphis, Urban-Serving Research Mission, to include in the SLP to show the difference a growth mindset can make on learning and teaching. We encourage more specific information be added to this section. | Recommended. Language will be revised to communicate that asset-based pedagogies apply to all schools and districts. A connection to the asset-based approach promoted in the *EL Roadmap* will be added to this section.  Not recommended. More specific information can be found on the web pages cited in this section. Increasing asset-based teaching in schools, including culturally and linguistically responsive and sustaining pedagogies, is a statewide literacy priority identified in the SLP and will be addressed though CLSD activities. |
| 12k | Boyd (continued) | 34 | The Whole Child  Starting on page 34, with the focus on the whole child, we were please to see an emphasis on social and emotional learning and well-being. The SLP is making the connection between literacy and social and emotional development. It would be helpful if the document defines how more specialists can help support students socially and emotionally, provide services for families who have children with special needs, or refer families to resources to help their child. Providing suggestions on how specialists can help in the social emotional realm can alleviate reluctance by school and district administrators to fund specialists through their LCFF funds. CTA thinks this topic is well-suited to mention the CDE’s Whole Child Resource Map and other CDE resources to include in this section. | Recommended. The CDE Whole Child Resource Map will be added to this section.  Not recommended. Regarding language around specialists, the SLP is not meant to establish new guidance. |
| 12l | Boyd (continued) | 27 | Assessment System  Extending on the whole-child and asset-based components of this document, we recommend some of the depictions and use of the assessments be presented in a less deficit and unilateral form. Less deficit notions of SBAC assessments as used solely for identifying gaps and more information on multiple uses of various classroom assessments and tools would be recommended in this section. For example, on page 27, paragraph 3 of Assessment Systems reads:  The Smarter Balanced Summative Assessments for ELA/literacy and mathematics are annual assessments that help identify and address gaps in knowledge or skills early on so students get the supports they need for success. The Smarter Balanced Summative Assessments for ELA are administered in grades 3−8 and grade 11. The Smarter Balanced interim assessments are specifically designed to provide meaningful information for gauging student progress throughout the year toward mastery of the skills measured by the summative assessments. Information about specific tools and resources are available on the CDE Smarter Balanced Interim Assessments web page.  CTA suggests that the first sentence in this paragraph should lead with an asset-based framing of the SBAC, starting with assessment of student mastery of standards first and then the identification of gaps. We propose that the sentence be rewritten as: “The Smarter Balanced Summative Assessments for ELA/literacy and mathematics are annual assessments that gauge student mastery of standards and identify gaps early on so students get the supports they need for success.” | Recommended. Language will be revised so gauging student mastery of standards comes before identifying gaps. |
| 12m | Boyd (continued) | N/A | Second, the third sentence in the above paragraph presents the SBAC summative assessments as definitive measures of individual student achievement. The sentence concludes by saying "…gauging student progress throughout the year toward mastery of the skills measured by the summative assessments." This goal contradicts existing guidance from Smarter Balanced and the CDE that the SBAC summative assessments are school, district and state-level reflection and accountability tools rather than strong student-level assessments, and that classroom assessments are more appropriate for monitoring actual student progress.  We attach Figure 8.3 from the *CA ELA/ELD Frameworks* demonstrating the state making this argument, in contrast to what is stated in the new *Literacy Plan*. To present the SBAC as the definitive end-of-the-year measure of student achievement undermines the CDE's work promoting formative and local assessment. CTA suggests that the third sentence be revised to read: "The Smarter Balanced interim assessments are specifically designed to provide meaningful information for toward mastery of the skills measured by the summative assessments *and other local measures*." It would be useful to also add a discussion around the important of assessment *for* learning and assessment *of* learning as depicted in the table below. | Recommended. Guidance from the *ELA/ELD Framework* regarding assessment for learning and assessment of learning will be added to this section.  No recommended. The sentence referenced in this comment is accurate as it appears in the SLP. |
| 12n | Boyd (continued) | 28, 51–56, 96–101 | Assessment System, page 28, paragraph 1  On page 28, paragraph 1, students who take assessments in English or in Spanish, depending upon the assessment, should not have to take the same assessment in both/multiple languages. For example, students taking assessment who are identified as “Newcomers” should not have to take both the Spanish and English versions of the Northwest Evaluation Association's (NWEA) assessment.  California Assessment of Student Performance and Progress  From pages 51-56 and pages 96-101 in Appendix B on CAASPP Trend and Cohort Results, the SLP provided graphs of CAASPP ELA/Literacy results. The graphs provide results by grade level and student group. It shows the data without much explanation of what the graph is saying, what the date means, and why it is important to use this data. This section must be intentional in helping educators interpret and understand how to use the data to develop goals and allocate LCFF funds to help our students. | Recommended. A reference to the Assessment chapter of the *ELA/ELD Framework* will be added to Step 2 for more information about assessment purposes and intentional uses.  Not actionable. No action is recommended regarding page 28. |
| 12o | Boyd (continued) | 56 | Analyzing Assessment of Learning to Evaluate Education Programs, page 56, boxed paragraph at the bottom of the page:  On page 56, boxed paragraph at the bottom of the page that reads:  In a Multi-Tiered System of Support, Tier 1 instruction should result in no less than 80 percent of students achieving grade-level expectations. If less than 80 percent succeed in Tier 1 instruction, schools should engage in close examination of the curriculum and teaching practices and make appropriate adjustments.”  Similar claims that "no less than 80 percent of students [should be] achieving grade-level expectations" can be found throughout the document. | Not actionable. |
| 12p | Boyd (continued) | 56 | CTA feels that this is a misrepresentation of MTSS. MTSS literature describes Tier 1 as "first instruction," and some does say that for approximately 80% of students, good first instruction (rigorous, engaging, inclusive, culturally relevant, etc.) should be enough for them to master standards without intervention, but other research presents that number as more of a range (such as 75-85%), and it is never intended to be an achievement goal, that if only 75% of students are reaching mastery, a school is not doing well enough and must re-evaluate instructional practices. This boxed text in the *Literacy Plan* presents 80% as a definitive benchmark, holding teachers and schools accountable if it is not achieved every year. CTA supports MTSS, however CTA feels this representation of MTSS and the focus on benchmarks of success undermines the strengths of the system. If 25% of students need Tier II intervention, then 25% of students need Tier II intervention, and arbitrary benchmarks should not be used to either deny services to students (because only 20% are allowed to receive intervention) or punish teachers and schools (because too many students need intervention). Reflection on curriculum and instruction should be a constant practice in a student-centered school, not a consequence from MTSS because “too many” students need intervention. | Not recommended. The guidance for MTSS is drawn from the *ELA/ELD Framework* and is not binding on LEAs. MTSS is provided as a framework and is not meant to establish state accountability measures. |

### Overall Comments

| **#** | **Source** | **Page** | **Comment** | **Response** |
| --- | --- | --- | --- | --- |
| 1 | Hunt | N/A | Research tell us that two thirds of low income children have no books in their home while children with up to 500 books achieve three additional years of schooling beyond their peers. And yet when children come into our system they are typically given a baggie of uninspiring leveled text by their classroom teacher, while they check out 0-2 books from the school library (which they may or may not be able to actually take home, for fear of losing said books). If we really want to move the needl | Not actionable. |
| 2 | Foster | N/A | I admit that I only had time to quickly read this. But I want to know how we make sure all teachers know how to help struggling readers? Most know absolutely nothing. And teachers need an evidence based curriculum! | Not actionable. The SLP includes plans for state-level activities to build school capacity to support students struggling with reading. |
| 3 | Ballesteros | N/A | I think this plan is excellent to address one of the most critical aspects of California's education system. | Not actionable. |
| 4 | Stern | N/A | I rated this document fair because it does not address the specific needs of dyslexic students. All school districts in California should be required to test for dyslexic students in kindergarten. Dyslexic students need it now. Testing for dyslexia should not be choice for school districts. Students with dyslexia have been waiting long enough. This should not be a budget issue or a political issue. Please survey how many California districts are doing required testing in kindergarten. | Not recommended. Building school capacity to support students struggling with reading, including, but not limited to, students with disabilities and students with dyslexia has been established in the SLP as a statewide literacy priority for transitional kindergarten through grade five. Statewide activities to address this priority will be aligned to the *California Dyslexia Guidelines*. |
| 5 | McGlasson | N/A | My concerns: 1. Will this be yet another multiple choice assessment which is designed to test trivial knowledge? Previous testing like No Child Left Behind was nothing more than a game of beat the test maker at a kind of trivial pursuit designed to make education look bad. | Not actionable. Changes to statewide assessments are outside of the scope of the SLP. |
| 6 | McGlasson | N/A | My concerns: 2. Will the implementation be one size fits all dogma or will it be designed to accentuate the various processes schools use now? | Not actionable. Local Literacy Lead Agencies will work directly with districts in their regions to pilot strategies to meet specific regional needs. |
| 7 | Schneider | N/A | Your last rated item shows why your omission of school libraries betrays your purpose. It is precisely traditionally underserved students who need to have equitable access to the materials and support of libraries and their staff who provide instruction, support and practice for information, content, disciplinary, and leisure literacy. | Not actionable. |
| 8 | Archon | N/A | The committee that helped created this draft only had on school librarian on it. For future work I think having a higher number representing this group would be beneficial. | Not actionable. |
| 9 | McKeeman Rice | N/A | If change in literacy is desired, then a very targeted and specific plan is needed. If the goal is literacy, then the science of reading needs to be included specifically because it is not intuitive and requires training and support. LETRS is a program that has shown significant results. SIPPS provides explicit and targeted foundational skill support. The state-adopted ELA/ELD programs need amplification in relation to foundational skills support (as evidenced by the current achievement gaps tha | Not recommended. One of the purposes of the SLP is connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. It is not meant to establish new guidance on literacy curriculum or instruction. |
| 10 | Roscigno | N/A | The focus on content specificity in literacy instruction makes the assumption that this does not occur in the content areas. Voice and choice are crucial components to student engagement, and becoming a lifelong literate individual. Scaffolded choice, as a part of workshop instruction is an element that does not appear in this guidance. | Not actionable. The *ELA/ELD Framework* and the *CCSS for ELA/Literacy* promote literacy across the content areas, establishing that every teacher is a literacy teacher. CLSD activities will align with state guidance and policies and will be evidence-based. |
| 11 | Nitsos | N/A | While the overall Comprehensive State Literacy Plan details a roadmap to improve literacy for all California students—including Dyslexia Guidelines and a Practitioner's Guide for Educating our English Learners with Disabilities—I have concerns regarding implementation and accountability. How will the CDE support the adoption of this plan by LEAs? How will the CDE measure implementation and outcomes? If we're not able to implement and measure the results, I question whether we'll see the inten | Not actionable. The CDE will monitor state-level activities, which includes accountability for Local Literacy Lead Agencies. |
| 11a | Younglove | N/A | I have finally had a chance to read through the 100+ page (Comprehensive) State Literacy Plan draft. I thank the California Department of Education and California State Literacy Team members, as well as the Instructional Quality Commission, for setting forth the proposal. To some extent, the information/details provided are a bit overwhelming, something that will need to be kept in mind as the federal grant is implemented. Rather than attempting to provide a detailed analytic commentary, I am going to draw upon my 57-year professional educator experience (38 years, grades 6-12 teaching; 19 years English Teacher Supervisor). First, some overall considerations: • Educational acronyms can (all too easily) overwhelm. For that reason, I have tried to spell everything out here. | Recommended. A glossary will be added to the appendix. |
| 11b | Younglove (continued) | N/A | • Literacy efforts, to succeed, must be interdisciplinary—across the curriculum, which means that attention must be given to the varied Frameworks. Every discipline is built upon its own literacy. As with the English Language Arts/English Language Development: Kindergarten Through Grade Twelve for California Public School Framework, the question will be: How best can a 1073 page document be referenced/used to provide teacher professional guidance? In this just-mentioned instance, I have found the 31-page Executive Summary document, providing descriptive snapshots and vignettes of grade-level instruction, to be most helpful. • That brings me to the Standards. Whether the Common Core State Standards (adopted in 2010) or referenced Content Standards, I believe that the Standards come to life through the Frameworks. If the Standards say: “What(?),” the Frameworks say “How and Why(?).” In other words, the Frameworks are the blueprint for “constructing” (i.e., implementing) the Standards. | Recommended. The Comprehensive and Integrated Literacy Model will be augmented to emphasize the inclusion of ALL Curriculum Frameworks, and additional references to frameworks other than the *ELA/ELD Framework* may be added throughout the SLP, as appropriate. More information regarding the integrated and interdisciplinary approach promoted in the *ELA/ELD Framework* will be included in the Comprehensive and Integrated Literacy Model, including references to snapshots and vignettes that illustrate how ELA, ELD, and content area instruction can be integrated. |
| 11c | Younglove | N/A | • Let me jump here, for a moment, to the classroom level—the teachers and students. The greatest challenge is (simply?) time—the time that it will take for adequate professional development to be able to implement the State Literacy Plan. Whether the Plan will fund 75 schools (or multiple that number), please allocate those resources in such a way that the Local Education Agencies, via school site administrators, can follow through on all Five Steps of the Plan. The purpose of the Plan: to align and integrate state literacy initiatives, content standards, and state guidance documents to support teachers of students birth through grade 12 is very clear-cut and is overwhelming in precept. Still it is, as the Preface states, a search for equity—with the goal of student readiness for college, career, and civic life. While I would reverse those first two (career first), the Common Core refused to do so. I would add here, however, something that is implied in the Plan, but I did not find mentioned per se; that is, Habits of Mind (can see Arthur Costa and Bena Kallick), some sixteen affective measures that may account for as much academic success, as do strictly cognitive measures. | Recommended. Information regarding “habits of mind,” as found in Curriculum Frameworks, will be added in relation to the integrated and interdisciplinary approach to literacy. |
| 13 | Turkie | N/A | I was a participant on the SLP panel, and I am not satisfied with the integrity of this document as it stands. This is a singularly focused document that does not incorporate a holistic or collaborative lens in how to implement best literacy practices. The two biggest omissions are the lack of scope with regard to literacy and the exclusion of the MSLS in this document. The onus of literacy teaching still stands with the classroom teacher in elementary and with the ELA teacher in secondary and d | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. The Learning in the 21st Century section will be expanded to include information about the *ELA/ELD Framework* goals of students becoming broadly literate and acquiring the skills for living and learning in the 21st century, and definitions of specific literacies defined by the Partnership for 21st Century Skills will also be added. Additional references may be added throughout the document, as appropriate. |
| 14 | Janetos | N/A | Clearly, a lot of hard word by a lot of people has gone into this document. As a former kindergarten and first grade teacher who has now worked with hundreds of struggling readers as a reading specialist, I am concerned that there isn't enough specificity and clarity regarding how to close the achievement gap by addressing the literacy needs of ALL children. This clarity should include specific references and diagrams related to the Simple View of Reading, Scarborough's Rope and structured liter | Not recommended. One of the purposes of the SLP is connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. It is not meant to establish new guidance on literacy curriculum or instruction. |
| 15 | DePole | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. Universal screening for signs of dyslexia should be emphasized in the SLP, as evidence-based screening, when conducted during the early grades, has been shown to help identify students at risk of reading failure during the window of time most optimal for effective | Duplicate comment. See response above |
| 16 | M. Potente | N/A | Structured Literacy needs to be prioritized. It is largely absent. Universal screening for signs of dyslexia should be emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. The SLP perpetuates flawed top-down model. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Recommended. References to the *California* *Dyslexia Guidelines* as an “additional resource” will be removed. |
| 17 | Hurd | N/A | Educators need more than just the MTSS model; they need the evidenced-based instructional approaches for teaching reading that make MTSS and RtI work. The order in which the themes in ELD Framework are presented is another example of how the Comprehensive and Integrated Literacy Model is upside down and reflects the lack of understanding about evidence-based practice. The State Literacy Plan was an opportunity to integrate, realign, and provide guidance; instead it just combines everything tha | Not actionable. The SLP is not meant to establish new guidance for curriculum and instruction in literacy. CLSD activities will support implementation of state guidance and policies and evidence-based instructional approaches. |
| 18 | Patterson | N/A | Structured Literacy needs to be prioritized. It is largely absent. Universal screening for signs of dyslexia should be emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. The SLP perpetuates a flawed top-down model. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Recommended. References to the *California* *Dyslexia Guidelines* as an “additional resource” will be removed. |
| 19 | A. Potente | N/A | Structured Literacy needs to be prioritized. It is largely absent. Universal screening for signs of dyslexia should be emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. The SLP perpetuates a flawed top-down model. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Recommended. References to the *California* *Dyslexia Guidelines* as an “additional resource” will be removed. |
| 20 | Fisher | N/A | We have already done this work and should not be reinventing the wheel. Use the Dyslexia Guidelines as a framework for this literacy plan. | Not actionable. |
| 21 | Hernandez | N/A | Integrates many critical policy documents/artifacts that strive for literacy equity across the state. Biliteracy and guidance for DLE programs still needed consistently throughout. Thank you! | Recommended. Language regarding biliteracy from state guidance and policies will be added to the Introduction. Supporting biliteracy whenever possible is included as a statewide literacy priority in the SLP. |
| 22 | Sapien | N/A | Overall, many pluses: strong focus on ELA/ELD Framewrk; educational equity; diversity of California’s students; inclusion of Early Ed Programs & Early Learning Preschool Foundations; strong section on EL Roadmap, & EDGE; uplifts Seal of Bil. However, these positives need to be carried throughout w/ more fidelity. Format & Clarity: Significant portions of document address only 1 disability. An overemphasis one of 5 Key Themes of ELA/Literacy & ELD Instruction, & other themes are neglected. | Not recommended. The statewide literacy priorities include building capacity for teaching foundational skills and supporting students with dyslexia because these were identified as statewide needs and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 23 | Peterson | N/A | Please add "biliteracy" after "literacy" throughout the document in order to highlight and prioritize the assets our English learners bring to school. Thank you for all your hard work on this important document. | Not recommended. However, language will be added in the Introduction about the intent that the term “literacy” includes “biliteracy” throughout the SLP. |
| 24 | Schlagel | N/A | This is not a comprehensive state literacy plan; it’s is a reference document. A legitimate plan has an overall objective, measurable goals, criterion, benchmarks with defined roles and responsibilities, and methods of accountability. SMART Goals. The SLP makes a false presumption of equity among LEAs, doesn't set standards for LEAs, teachers, or teacher prep, and doesn't address known issues. Lots of missed opportunities. A new mandate is needed. CA deserves a real plan not hyperbole. | Not recommended. One of the purposes of the SLP is connecting essential literacy guidance from state guidance documents to support comprehensive and integrated implementation of high-quality literacy programs at state and local levels. It is not meant to establish new guidance on literacy curriculum or instruction or new mandates. |
| 25 | Luckey Treiber | N/A | Structured Literacy needs to be prioritized. It is largely absent. Universal screening for signs of dyslexia should be emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. The SLP perpetuates a flawed top-down model. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Duplicate comment. See response above. |
| 26 | Mullenger | N/A | Structured Literacy needs to be prioritized. It is largely absent. Universal screening for signs of dyslexia should be emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. The SLP perpetuates a flawed top-down model. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Duplicate comment. See response above. |
| 27 | Kelly | N/A | All communications to the public should be viewable on multiple platforms. Apple computers far out number Window’s based units. Put “Parents and communities “ at the top of your “Audiences for the SlP” list, not the bottom. They are the ones that live with your successes and failures, and finance your efforts! Remind institutions that hold the textbooks that are up for state adoption that the community has a right to review those materials! | Not actionable. It is not clear what communication is not viewable on Apple devices. Public review of textbooks is not addressed in the SLP. |
| 28 | Williams | N/A | We already know how to increase literacy: let children read. Let them choose their own reading. Let them discuss, create, construct knowledge, research, and present their learning in a variety of educational landscapes. The library, under the administration of the Library Team, offers the best 'bang for the buck' in supporting that increase across all the literacies. Leaving them out of this document is downright disheartening in this day and age. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 29 | Linden | N/A | How can you propose a literacy plan that seems to have almost entirely excluded school libraries? School libraries have been called the "great equalizer" as a means of leveling the playing field for underserved students. Whether staffed by a credential teacher librarian or paraprofessional staff, school libraries are the center of materials access for CA students. The CA Model School Library Standards should be included in this important literacy document. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 30 | Mejia | N/A | Addressing the salary gap between pre-school educators and elementary educators would go far in establishing and retaining the best teachers in early literacy programs. ELs remain a priority in early literacy. Ensuring the developmental task types from the ELPAC are included in preschools would support early literacy development. | Not recommended. Salaries are outside of the scope of the SLP. Birth to Age 5 activities will be aligned to state guidance and policies and evidence-based approaches. |
| 31 | Spiegel Coleman | N/A | The inclusion of the following helpful and positive: a strong focus on ELA/ELD Framework; educational equity; diversity of California’s students; inclusion of the Early Education Programs and Early Learning Preschool Foundations; strong section on EL Roadmap, and EDGE; uplifts Seal of Biliteracy These elements need to be aligned, consistent and addressed throughout the plan. | Not actionable. |
| 32 | Anderson | N/A | Structured Literacy needs to be named, explained, and prioritized in the SLP. It is largely absent from the document, despite the fact that it is the type of instruction critical for learning to read for some, and beneficial for all. The preventative power of universal screening for signs of dyslexia is not expressed in the SLP Draft. Diagnostic screening is critical to the effective implementation of MTSS, but receives little attention in the SLP Draft. Children at-risk for reading failure can | Duplicate comment. See response above. |
| 33 | Petish | N/A | Educators need more than just the MTSS model; they need the evidenced-based instructional approaches for teaching reading that make MTSS and RtI work. The order in which the themes in ELD Framework are presented is another example of how the Comprehensive and Integrated Literacy Model is upside down and reflects the lack of understanding about evidence-based practice. The State Literacy Plan was an opportunity to integrate, realign, and provide guidance; instead it just combines everything tha | Duplicate comment. See response above. |
| 34 | Lockwood | N/A | One of the goals is to support students struggling with reading. It should be noted all students, struggling and proficient, need access to text (books) & access comes though the school library. Libraries provide equitable access when resources are shared by all. Yet school library access, development of a quality program or inclusion of a valued collaborative literacy partner in a teacher librarian is not mentioned in the SLP as an effective strategy an LEA could apply in their literacy plan. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 35 | Wong | N/A | Overall, many positives: a strong focus on ELA/ELD Framework; educational equity; diversity of California’s students; inclusion of the Early Education Programs and Early Learning Preschool Foundations; strong section on EL Roadmap, and EDGE; uplifts Seal of Biliteracy. However, these positives need to be carried throughout the document with more fidelity. Significant portions of the document address only one disability. An overemphasis one of the Five Key Themes of ELA/Literacy and ELD Instruc | Not recommended. The statewide literacy priorities include building capacity for teaching foundational skills and supporting students with dyslexia because these were identified as statewide needs and CLSD activities are intended to build expertise with specific strategies. However, language will be strengthened in the SLP to ensure implementation aligns with the comprehensive and interdisciplinary approach promoted in the *ELA/ELD Framework*. The CDE recognizes the range of disabilities that may influence literacy development. The *California Dyslexia Guidelines* appear in this section because they are essential state literacy guidance. The SLP prioritizes supporting students who are struggling with reading and this is not limited to supporting students with dyslexia. |
| 36 | Pichot | N/A | How to teach & monitor key foundational skills should be prioritised. Screening tools should be suggested and emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. A section on writing should be considered. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Duplicate comment. See response above. |
| 37 | Hatcher Day | N/A | Leaving librarians out of this plan will create a barrier between literacy efforts and literacy experts. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 38 | McMillan | N/A | It is critical that you include credentialed teacher librarians and fully staffed school libraries in this literacy plan. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 39 | Sedgwick | N/A | I like the strong focus on ELA/ELD Framework; educational equity; diversity of California’s students; inclusion of the Early Education Programs and Early Learning Preschool Foundations; strong section on EL Roadmap, and EDGE; uplifts Seal of Biliteracy. It could be better if these positives carried through the entire document more overtly. Significant portions of the document address only one disability. It could be better with an emphasis on all Five Key Themes of ELA/Literacy and ELD Instruc | Duplicate comment. See response above. |
| 40 | Raygoza | N/A | What a great opportunity to align all of the rich documents that exist in the State of California. The ELA/ELD Framework, Common Core State Standards in English and Español, the Spanish Language Development Standards and the passage of Proposition 58 for a multilingual California, Global 2030 Initiative, as well as the EL Roadmap, provide a wealth of guidance and recognition that language and literacy are key to the development of California's students. Let's keep our vision on the development | Not actionable. |
| 41 | Iturralde | N/A | This funding program presents a critical opportunity to help vulnerable readers. Therefore, this plan must clearly specify evidence-based, structured literacy practices as core to any funded programs. As stated above, universal dyslexia screening must also be core to the plan. The plan must include an accepted model of reading theory rather than the wholly discredited models associated with "balanced literacy." The CA Dyslexia Guidelines must be a central framework in the plan, similar to plans | Not actionable. Structured literacy and universal screening are addressed in the SLP and CLSD activities will be aligned to the *California Dyslexia Guidelines*. |
| 42 | Parra | N/A | I would like to thank everyone putting their inputs together and acknowledge that all our scholars need more literacy support. My only additional comments is geared towards scholars who are diagnosed with SLD, Dyslexia and ADHD in their IEP and scholars who still haven't been diagnosed as of yet who are failing their classes. As a parent, I know the feeling of struggling in classes and as an adult still having a learning disability. Since then, our daughter was diagnosed with ADHD in second grad | Not actionable. |
| 43 | Martinez | N/A | The state has issued really promising policy guidance around serving ELs, much of which has been referenced in this plan. However, that guidance is not well integrated in the literacy model, which remains focused on English literacy development. If we want this plan to embrace asset-based instruction for ELs and biliteracy options for all students, it needs to comprehensively address biliteracy program models, biiteracy measures, and training for educators on appropriate measures of literacy pro | Recommended. Language regarding biliteracy programs will be added to the Introduction. Biliteracy measures are included in the Assessment Systems section and the professional learning opportunities will support biliteracy programs. |
| 44 | Merrit | N/A | Because biliteracy seems so far on the periphery of this document and the standards and frameworks it references and creates, it does not adequately reflect the realities of the future of literacy education in California. I would urge the stakeholders to revisit the role of biliteracy in literacy education overall, but to at very least bolster some of the sections that need to include reference to biliteracy. Thank you! | Recommended. Language regarding biliteracy programs will be added to the Introduction. |
| 45 | McNamara | N/A | Our underserved students are not considered. This plan does not take the time to address how we got to such low literacy levels. Putting more funds in the same direction will not help our students. Everyone deserves access to school libraries and credentialed teacher librarians. For a shift in literacy levels, literacy (including all literacies) needs to be valued for our students. The plan seems to be haphazardly thrown together, making our children lose, again. I would love to California tak | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 46 | Tran | N/A | Overall, many positives: a strong focus on ELA/ELD Framework; educational equity; diversity of California’s students; inclusion of the Early Education Programs and Early Learning Preschool Foundations; strong section on EL Roadmap, and EDGE; uplifts Seal of Biliteracy. However, these positives need to be carried throughout the document with more fidelity. | Duplicate comment. See response above. |
| 47 | Sheppard | N/A | It is the underserved that are being left out again in this draft. The underserved students in out community demand the draft be revised so that they have equitable access to materials that include the certificated Teacher Librarian that provides instruction across grade-levels and academic content areas where students can practice information, all literacies across both content and recreation for personalized learning and ultimate growth for their lifetime. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 48 | Linn-Nieves | N/A | Kudos for the idea of focusing on the ELA/ELD Framework. | Not actionable. |
| 49 | Rivera | N/A | I like the fact that the plan is open enough that COEs can work with LEAs to specifically address their needs but in a way that is systematic and evidence-based. That may be the reason, however, it seems difficult to ascertain what the plan really is in terms of actions being implemented. The plan itself is a bit long for most people to be diving into, but I get the idea of trying to knit existing elements into a cohesive system. I appreciate that we, as a state, have a lot of good elements in | Not actionable. |
| 50 | Tompkins | N/A | Structured Literacy needs to be prioritized. It is largely absent. Universal screening for signs of dyslexia should be emphasized. Details about the diagnostic measures fitting within MTSS need to be in SLP. The SLP perpetuates a flawed top-down model. Coherent guidance based on evidence-based Scarborough’s Reading Rope and the simple view of reading should be included. The Dyslexia Guidelines should be recognized as critical in first teaching and deserve equal presence with other frameworks | Duplicate comment. See response above. |
| 51 | Hamrick | N/A | Doesn't mention the CDE's Model School Library Standards, although they are very relevant. Also, Teacher Librarians are not mentioned much in this document. Before a huge amount of the funding is spent on coaches and coordinators to implement these plans, please remember that hundreds of sites have a literacy expert on staff, their Teacher Librarian, who is experienced and trained for this work. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 52 | Hohls | N/A | This Draft State Literacy Plan is a beginning. In order to create a state plan that will have the greatest impact on the most students, it must be expanded and inclusive of the tools and resources already available to, or mandated of, LEA's. Student literacy starts with words on a page, but 21st Century literacy skills must include inquiry and information. One of the most equitable and accessible resources an LEA has is the school library. Include the Model School Library Standards in this Plan. | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |
| 53 | White | N/A | Making the decision to share these responses has been difficult for me. I know that all those concerned with creating the SLP have worked hard and long. In the end (you can tell from the time I'm sending this survey how long it took me to decide), I am sending my concerns because reading instruction for CA's most vulnerable students must change. I believe the SLT, as it now stands, will not facilitate the substantive and lasting changes needed to ensure literacy for the students who need us most | Not actionable. |
| 54 | Bishop | N/A | As a Teacher (4th/5th grades) for 15 yrs teaching mainly English Language Learners then a Teacher Librarian. My ability to support literacy broadly was amplified 1000% at the schools BEST literacy bang for the buck! Providing to teachers,students the BEST books & resources, research, information literacy lessons,helping students understand/synthesize information to become a fully informed Californian is what this position does. To not include our services in this literacy plan is truly baffling | Recommended. The *California Model School Library Standards* will be added to the Comprehensive and Integrated Literacy Model and guidance from the standards and guidance from the *ELA/ELD Framework* concerning school libraries will be incorporated throughout the SLP, as appropriate. |

## Appendix: List of Additional Signers of Letter Submitted by Commenter #77

Cari Edwards  
Advocate and Parent  
Achieve Educational Advocacy

Colleen Arnold  
Special Education Advocate  
Arnold Advocacy

Carolyn Stallings  
Capital Kids Occupational Therapy

Jennifer Veras  
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Central Valley Support Group

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Consortium on Reaching Excellence in Education

Lauren Greenberg  
Senior Adolescent Literacy Specialist  
Consortium on Reaching Excellence in Education

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School Psychologist & Education Consultant  
Constant Love and Learning LLC

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Decoding Dyslexia CA

Megan Potente  
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Decoding Dyslexia CA

Tobie Meyer  
Past State Director  
Decoding Dyslexia CA

Haya Sakadjian  
Dyslexia Parent Support Group of South Orange County

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Dyslexia Voice

Melissa Osetek  
Education Specialist/Therapist  
Education in Motion

Bill Lucia  
President & CEO  
EdVoice

Scott Roberts  
Owner  
FundaDream

Jessica Hamman  
Founder & CEO  
Glean Education

Roma Chadha  
Dyslexia Tutor  
I See, I Spell, I Learn

Mara Wiesen  
Immediate Past President  
International Dyslexia Association – Los Angeles Branch

Emma Elizalde  
President  
International Dyslexia Association – Northern California Branch

Sherry Sachar  
Sp. Ed, Learning Specialist- Dyslexia  
International Dyslexia Association – Northern California Branch

Regina Richards  
Educational Therapist & University Instructor  
International Dyslexia Association – Southern CA Tri-Counties Branch

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Senior Paralegal  
Law Office of Andrea Marcus, APC

Andrea Marcus  
Attorney  
Law Office of Andrea Marcus, APC

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Law Office of Heather S. Zakson

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Law Office of Robin Miller

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Los Angeles South Bay Support Group

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Director  
Music Is First

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San Francisco N. Peninsula Support Group

Robert Mullenger  
Support Group Co-Leader  
San Francisco S. Peninsula Support Group

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SFUSD Community Advisory Committee for Special Education

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Dyslexia Tutor  
Skills Learning Clinic

Carol H. Clark  
Retired administrator/Instructor of Teachers  
Slingerland Institute for Literacy

Laurie Costa  
Resource Specialist  
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Ben Orbach  
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The Ascendant Athlete

Christine Strena  
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The Sagacious Dyslexic

Steve Carnevale  
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William Patterson Tutoring

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Rachel Abramovitz  
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Jess Anders

Bridget Anderson  
Reading Specialist

Jo Ellen Anderson  
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Sabrina Axt  
Special Education Attorney and Advocate

Brenda Banuelos  
Parent

Nicola Baptiste

Christine Barnett

Michelle Bartholomew  
Resource Center Facilitator

Anissa Basoco-Villarreal

Jamesina Bateson

Virginia Battuello

Marlee Benefiel  
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Karen Benjamin  
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Susan Benoit  
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John Bergman  
Hacienda Coffee and Tea

Hiromi Bergman  
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Michelle Brown  
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Jennifer Callahan

Kelley Callahan

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Michelle Castro

Debbie Cerruto  
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Alina Cervantes

Michelle Chabra

Colleen Clark  
Parent & MSW

Renee Clark  
Educational Consultant

Jess Cleveland

Pamela Cohen  
Parent

Vicki Colosi  
Librarian

Kari Cone  
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Kristi Connolly

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Amie Johnson  
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Mendy Johnston  
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Educational Therapist - literacy specialist

Sewellyn Kaplan  
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Mary Kelley

Havah Kelley  
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Amber Owen

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Shannon Barton

Laura Patton

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Rhonda Radcliff

Jackie Rader

Dana Radford

Cheri Rae  
Journalist

Richard Ravizza  
Grandparent

Sigrid Ravizza  
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Dawn Raya

Katherine Reich

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Judith Reising  
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Deborah Sisley  
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Kathryn Smith

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Retired public educator

Kimberly Stewart  
Parent and Citizen that cares for all kids

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Sara Stonepsihas

JJ Stott

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High School Student

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Kim Swords

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Parent

Tin Tapales

Robert Tassano  
Resource Teacher

Linda Taylor  
Teacher

Stacie Thiel  
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R Thomas

Wade Tompkins  
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Amy Tompkins  
Parent

Kathryn Torbati  
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Ann Tosto  
Concerned Aunt

Dave Treiber  
Grandparent

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Elizabeth Trudeau

Ryan Tuengel

Todd Tuengel

Valerie Tuengel

Arlene Turano  
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Kimberly Valdivia

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Geralyn Clancy  
Special Education Attorney and Parent

Valerie Tuenge

California Department of Education, November 2020

1. Additional signers of this letter are listed in the Appendix. [↑](#footnote-ref-2)