

# Advocates for Literacy

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July 20, 2016

Ann Whalen  
Assistant Secretary for Elementary and Secondary Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington D. C. 20202

**RE: Docket ID: ED-2015-OESE-0129  
Recommendations for Proposed Priorities, Definitions, and Selection Criteria—Striving  
Readers Comprehensive Literacy Program**

Dear Assistant Secretary Whalen,

Thank you for the opportunity to provide to the Department of Education comments on the Proposed Priorities, Requirements, Definitions, and Selection Criteria specified for the Striving Readers Comprehensive Literacy Program (SRCL) in the *Federal Register* Volume 81, Number 118 (Monday, June 20, 2016). On behalf of Advocates for Literacy, we are writing to provide input on areas of the proposed actions to ensure that the application for the Fiscal Year (FY) 2016 SRCL grant awards reflects the full intent and provisions of Title II, Part B, Subpart 2 of the *Every Student Succeeds Act* (ESSA), *the Literacy for All, Results for the Nation* (LEARN) program. This input is based on expertise from the member organizations of the Advocates for Literacy coalition as well as lessons learned from the SRCL Program funded by the Department since FY 2010.

Advocates for Literacy is a coalition of over 60 organizations that supports improved literacy instruction through comprehensive, birth through grade twelve state-led literacy plans that target struggling and economically-disadvantaged students with low-performing English language arts assessment scores. The group supports increasing the federal commitment to comprehensive literacy instruction through increased federal resources and evidenced-based practice as defined within ESSA.

First and foremost we would like to commend the Department of Education for the effort and thought put into the proposed notice to align the FY 2016 grant awards with ESSA's LEARN program through the inclusion of proposed definition of priorities and terms from the new statute. We understand in this period of transition as States prepare to implement the new law, overseeing a new SRCL competition presents some unique opportunities as well as challenges.

## **Specific Recommendations – Proposed Priorities**

### *Proposed Priority 1*

The Advocates of Literacy coalition believes that emphasizing evidence-based practice in competitive grant programs is essential. However, the coalition recommends a change to *Proposed Priority 1: Interventions and Practices Supported by Moderate or Strong Evidence of Effectiveness*. Instead, we believe the evidence-base required for SRCL grantees should be

## Advocates for Literacy

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aligned to the definition of “evidence-based” as referenced in LEARN—Title VIII, Sec. 8101(21)(A)(i) of ESSA. (See below for ESSA definition of “evidence-based.”).

The proposed SRCL regulations and requirements state “that (a) the comprehensive literacy instruction programs funded under this grant are supported by moderate evidence of effectiveness or strong evidence of effectiveness” as defined by 34 CFR 77.1.<sup>1</sup> Using a common definition of evidence-based would facilitate an “orderly transition to the ESEA, as amended by the *Every Student Succeeds Act*” (pg. 39876 of Federal Register, Volume 81, Number 118, Proposed Rules). As the Department’s highly successful *Investing in Innovation* grant program—now *Grants for Education Innovation and Research* in ESSA—has demonstrated, federal investments can support innovation by defining “evidence-based” more broadly. The SRCL application should encourage states and districts to develop plans that include disciplined, inquiry cycles to develop, test and refine interventions for purposes of continuous improvement. States and districts will encounter enormous barriers to replicate only those interventions with moderate and strong evidence of effectiveness based on experimental or quasi-experimental studies. The SRCL grant program will serve students from birth through grade twelve with varying language and literacy needs, including early learners, students with disabilities and English learners. Students struggling to master grade level reading and writing skills experience a wide range of challenges and will require an equally wide range of interventions and strategies.

In addition, we recommend that the Department expand the information and tools on using evidence-based practices to assist states and local school district in developing high-quality grant applications. Recently the Institute of Education Sciences (IES) released findings from the [Reading for Understanding](#) (RfU) research initiative, showing efficacy of interventions for students with reading comprehension difficulties across multiple grade spans. RfU involves six teams of 130 researchers who work in close collaboration to rapidly develop and test new approaches and interventions in multiple content areas and grades. In a similar vein, the [National Center for Special Education Research](#) (NCSER) released preliminary findings on improving the reading, writing, and language skills of students with or at risk for disabilities. NCSER plans on developing an array of tools and strategies on assessments and instructional approaches based on these investigations.

### *Proposed Priority 2*

The Advocates for Literacy coalition is supportive of *Proposed Priority 2: Serving Disadvantaged Children* as we believe that an important focus of the SRCL program should be investing in the pre-literacy and literacy skills of disadvantaged children, including English learners and children with disabilities. In addition our Coalition is committed in our strong support regarding the alignment of resources to include:

- Targeting subgrants to local education agencies (LEAs) to support projects that will improve instruction for the greatest numbers or percentages of disadvantaged, low-performing children; and
- Awarding subgrants of to fully and effectively implement locally devised plans while also ensuring that at least—

## Advocates for Literacy

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- (i) 15 percent of the subgranted funds serve children from birth through age five;
- (ii) 40 percent of the subgranted funds serve students in kindergarten through grade five; and
- (iii) 40 percent of the subgranted funds serve students in grade six through grade 12, including an equitable distribution of funds between middle and high schools.

### *Proposed Priority 3*

In addition, the Advocates for Literacy coalition supports *Proposed Priority 3: Alignment within a Birth through Fifth Grade Continuum*. We also suggest, however, that language in this priority could be strengthened by clarifying that approaches to supporting early language and literacy in early childhood should begin with laying foundations on which subsequent skills are built, by aligning from the bottom-up.

Specifically we recommend:

- Inserting language that highlights in the background section: “Meeting this objective necessitates close alignment at a State and local level between early care and learning programs and elementary education programs, *while maintaining a differentiation of interventions and practices for different age groups*;”
- Under *Proposed Priority 3*, amend to read “an SEA must describe in its application a high-quality plan to align, *through a progression of approaches appropriate for each age group, early language and literacy projects supported by this grant that serve children from birth to age five with programs and systems...*”.

### **Specific Recommendations – Proposed Requirements**

#### *State Comprehensive Literacy Plans*

The Advocates for Literacy Coalition agrees that State Education Agencies (SEAs) should ensure that their State literacy teams assess their State comprehensive literacy plans *on a regular basis* and that these plans include continuous improvement activities. The SRCL program was originally authorized as part of the FY 2010 Consolidated Appropriations Act (Pub. L. No. 111-117) under the Title I demonstration authority (Part E, Section 1502 of the Elementary and Secondary Education Act (ESEA). Through this law, formula grants were awarded to SEAs and other entities to establish or support a State Literacy Team with expertise in literacy development and education for children from birth to grade 12 to assist in developing a comprehensive literacy plan aligned with their system-wide academic content standards to advance pre-literacy, reading and writing skills of children and youth. Forty-seven (47) SEAs, the District of Columbia, the Bureau of Indian Education, Virgin Islands, American Samoa, Guam and Mariana Islands each developed a [Comprehensive Literacy Plan](#). As a result, we believe it is important to clarify that while a State Literacy Plan should be a requirement to be considered for a SRCL award, the development of a *new* State Literacy Plan should *not* be required but instead a SEA should be allowed to *update and refine* their existing plan.

#### *Local Literacy Plan*

The Advocates for Literacy coalition is pleased that the proposed requirement for SRCL grantees must ensure that they will only fund subgrantees that submit a local literacy plan that is

## Advocates for Literacy

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“informed by a comprehensive needs assessment” as this is well aligned with ESSA, Title II, Sec. 2224(a)(4) which states that local school districts must conduct needs assessments as part of their subgrantee applications to SEAs “to identify how subgrant funds will be used to inform and improve comprehensive literacy instruction at the school.” We would like to point out, however, that since the vast majority of states and local school districts have *not* conducted literacy needs assessments in the past, we recommend that the Department provide best practices as well as example tools or surveys to help SEAs and local school districts meet this requirement, ultimately resulting in higher quality applications at the state and local levels.

In addition, as stated above, we strongly recommend that local literacy plans include evidence-based interventions and practices as defined in Title VIII, Sec. 8101(21)(A)(i) of ESSA.

### **Specific Recommendations – Proposed Definitions**

#### *Comprehensive Literacy Instruction*

The Advocates for Literacy coalition is very supportive of the proposed definition of “comprehensive literacy instruction” as it aligns directly with the definition included in the LEARN program in ESSA. In addition, we urge the Department to use its expertise to augment this definition with provisions and terminology more attuned to the needs of young children.

Specifically within this definition we recommend:

- adding a new (b) directly focused on children ages birth to five to make clear that “explicit, systematic instruction in particular literacy skill areas” cannot be always be applied to babies:  
“(b) *Includes for children ages birth to five, practices that promote responsive interactions, encouragement of active exploration, and integration of learning across developmental domains;*”

#### *High-Quality Plan*

Included in the proposed definition of “high-quality plan,” there is a single reference to “performance measures at the State and local levels.” To help ensure high quality evaluations of the SRCL grantees and to better align with the requirement included in ESSA’s LEARN program Sec. 2225(b) that requires the Secretary of Education to disseminate the findings of the evaluation to SEAs and subgrant recipients for purposes of program improvement, we recommend that the Department provide examples of the types of “performance measures” that could be included as part of a High-Quality Plan. We recommend that ED work with the Institute of Education Sciences (IES) to identify performance measures that are differentiated by gradespan and can be included as examples for states to consider.

#### *State Literacy Team*

As stated in the proposed definition of a State Literacy Team, the composition of the team include individuals with expertise in literacy development and education for children from birth through grade 12 in addition to expertise in “more than one area”. As a result, we strongly recommend that other team members may *also* include: specialized instructional support personnel; representatives from institutions of higher education; and business. Including

## Advocates for Literacy

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individuals from these areas is critically important to produce a high-quality, comprehensive state literacy plan.

### **Conclusion**

Once again, on behalf of the members of the Advocates for Literacy, we appreciate the difficult work being done by your staff to implement SRCL in accord with the provisions of ESSA in a timely and efficient manner. We thank you for your consideration of our recommendations for the proposed SRCL Priorities, Requirements and Definitions and for the opportunity to provide feedback.

Advocates for Literacy

(60 individual organizations signed below)

1. Academic Language Therapy Association
2. ACT
3. Advocacy Institute
4. Alliance for Excellent Education
5. American Association of Colleges for Teacher Education
6. American Occupational Therapy Association
7. Association for Career and Technical Education
8. Association of American Publishers
9. Association on Higher Education and Disability
10. Association for Middle Level Education
11. American School Counselor Association
12. Council for Exceptional Children
13. Education Northwest
14. Early Care and Education Consortium
15. Easter Seals
16. Every Child Reading
17. First Five Year Fund
18. First Focus Campaign for Children
19. Grimes Reading Institute
20. Higher Education Consortium
21. HighScope Educational Research Foundation
22. Home Instruction for Parents of Preschool Youngsters (HIPPY)
23. Institute for Educational Leadership
24. International Dyslexia Association
25. International Literacy Association

## Advocates for Literacy

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26. Keys to Literacy
27. Learning Disabilities Association of America
28. Literacy How, Inc
29. National Adolescent Literacy Coalition
30. National Association for the Education of Young Children
31. National Association of Elementary School Principals
32. National Association of School Psychologists
33. National Association of Secondary School Principals
34. National Association of State Boards of Education
35. National Black Child Development Institute
36. National Center for Families Learning
37. National Center for Learning Disabilities
38. National Coalition for Literacy
39. National Council of Teachers of English
40. National Down Syndrome Congress
41. National Down Syndrome Society
42. National Forum to Accelerate Middle-Grades Reform
43. National Head Start Association
44. National Title I Association
45. National Urban Alliance for Effective Education
46. National Women's Law Center
47. National Writing Project
48. Nemours Children's Health System
49. Parent Child Home Program
50. Parents as Teachers
51. Reading Partners
52. Reading Recovery Council of North America
53. Scholastic Inc.
54. School Social Work Association of America
55. TASH
56. TESOL International Association
57. The Arc
58. United Way Worldwide
59. WestEd
60. ZERO TO THREE

## Referenced Legislative Language

### **ESSA Definition of “Evidence-Based”**

SEC. 8101(21)(A)(i). EVIDENCE-BASED.

“(21) EVIDENCE-BASED.— “(A) IN GENERAL.—Except as provided in subparagraph (B), the term ‘evidence-based’, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—

“(i) demonstrates a statistically significant effect on improving student outcomes or other relevant out-comes based on—

“(I) strong evidence from at least 1 well-designed and well-implemented experimental study;

“(II) moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study; or

“(III) promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or

“(ii)(I) demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and

“(II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

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<sup>i</sup> What Works Clearinghouse Procedures and Standards Handbook (Version 2.1, September 2011), which can currently be found at the following link: <http://ies.ed.gov/ncee/wwc/DocumentSum.aspx?sid=19>.