

## Appendix B

March 29, 2024

Committee on Accreditation

1900 Capitol Avenue Sacramento, CA 95811

### **Subject: Response to Allegations Raised in Decoding Dyslexia Complaint**

Dear Committee on Accreditation,

We appreciate the opportunity to address the concerns outlined in the complaint from Decoding Dyslexia regarding the syllabus of MCNU Educators for Liberation, Justice, and Joy (ELJJ)'s preliminary Multiple Subject program. The complaint alleges that the program fails to comply with the literacy instruction precondition 3 and Domain 7 literacy instruction standard.

The complaint from Decoding Dyslexia alleges that the syllabus inadequately addresses the Teacher Performance Expectations (TPEs) laid out by the California Commission on Teaching Credentialing (CCTC) and further alleges that references to specific readings and practices included in the course outline should be viewed as "unacceptable," based on a statement from the National Council on Teacher Quality. This response takes up both of those assertions in turn.

First, it is clear and apparent that the [set of courses comprising the degree program](#) addresses all of the foundational skills and other elements of the TPEs, as the mapping linked to the syllabus shows ([Multiliteracies 1](#), [Multiliteracies 2](#), [Multiliteracies 3](#)). These include alphabetics, phonological awareness, phonics, spelling, and word recognition (including phonetic and morphemic approaches), as well as fluency and comprehension, along with discussion of how to engage in systematic, explicit instruction.

Second, while the complaint alleges that specific practices included in the program are not evidence-based, it is incorrect in that assertion. The complaint cites a paper from the National Council on Teacher Quality (NCTQ), an advocacy group, not an academic body, listing a set of "unacceptable" practices that it claims to have culled from research. These practices include any use of the Fountas and Pinnell text, the use of guided reading, running records, or miscue analyses, and any reference to "balanced literacy."

However, NCTQ misrepresents the research included in the references it cites and from the broader body of evidence in the field. In fact, many of the articles cited in the NCTQ paper provide substantial evidence for the practices the paper claims lack evidence, including miscue analysis and running records. Examples can be found in Stouffer's<sup>1</sup> review of running records

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<sup>1</sup> Stouffer, J. (2021). Seeking middle ground: Analyzing running records from the top and bottom. *The Reading Teacher*, 74(6), 769-784.

and miscue analyses; Rodgers and coauthors,<sup>2</sup> who describe the benefits of running records and conclude that “as an assessment tool, Running Records can provide a reliable written record of a student’s oral reading that teachers can use to inform instruction” (p. 692), offering evidence for training scorers for greater accuracy. Further, Castles and colleagues<sup>3</sup> stress the importance of balanced literacy approaches.

Further, the NCTQ paper references also include an experimental study comparing guided reading and explicit intervention for struggling students to traditional classroom instruction (Denton, et al.).<sup>4</sup> The study found that “outcomes for the intervention groups (guided reading and explicit intervention) did not differ significantly from each other” (p. 268). Explicit instruction provided larger advantages in comparison to traditional classroom instruction for certain decoding skills for struggling readers and was recommended for Tier 2 interventions. Some other studies have found that explicit instruction along with guided reading produces the strongest outcomes,<sup>5</sup> and indeed Fountas and Pinnell (1996) stated that guided reading should be one part of a primary-grade balanced reading program that also includes explicit lessons designed to teach how letters and sounds work. The two sets of practices are cumulative, not at odds.

Our planned coursework does just that: instructing teachers about how to offer explicit, systematic instruction in the foundational reading skills and using strategies like guided reading, running records, and miscue analyses as useful adjuncts to that instruction. We prepare teachers to collect rich information about how students are reading, which can inform future explicit instruction, and to help readers develop other skills leading to fluency and comprehension.

**Guided reading:** There are many aspects of the process of learning to read, and different strategies will be useful for different purposes and for different populations of students at different moments in time. The goal of guided reading is, together with explicit instruction in decoding, to help students learn how to approach texts so that they can read with understanding, with increasing independence over time. The teacher scaffolds the language structures or features of a text, promoting several kinds of comprehension (literal, inferential,

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<sup>2</sup> Rodgers, E., D’Agostino, J. V., Berenbon, R., Johnson, T., & Winkler, C. (2023). Scoring Running Records: Complexities and affordances. *Journal of Early Childhood Literacy*, 23(4), 665-694.

<sup>3</sup> Castles, A., Rastle, K., & Nation, K. (2018). Ending the reading wars: Reading acquisition from novice to expert. *Psychological science in the public interest*, 19(1), 5-51.

<sup>4</sup> Denton, C. A., Fletcher, J. M., Taylor, W. P., Barth, A. E., & Vaughn, S. (2014). An experimental evaluation of guided reading and explicit interventions for primary-grade students at-risk for reading difficulties. *Journal of Research on Educational Effectiveness*, 7(3), 268-293.

<sup>5</sup> See for example, Kamps D, Abbott M, Greenwood C, Arreaga-Mayer C, Wills H, Longstaff J, Walton C. Use of evidence-based small-group reading instruction for English language learners in elementary grades: Secondary-tier intervention. *Learning Disability Quarterly*. 2007;30:153–168.

and evaluative), simultaneously developing fluency. While teachers may attend to student decoding while teaching the lesson (noting, for example, the kinds of things that are problematic that may inform future direct instruction) and may even focus on a decoding strategy that will be useful when reading, explicit work on decoding takes place primarily in a different part of the reading lesson. Ford and Opitz (2011)<sup>6</sup> noted that guided reading is a practice that promotes opportunities for ongoing independent learning. When readers are guided to talk, think, and read their way through a text, they build up a “self-extending system,” so that every time reading occurs, more learning about reading ensues.

Several studies found positive effects of guided reading on various aspects of reading achievement.<sup>7</sup> There are others that found positive effects of guided reading as part of Leveled Literacy Intervention, a small group intervention for struggling readers that also provides explicit instruction in phonological awareness, phonics, fluency, vocabulary, reading comprehension, oral language skills, and writing. Using leveled texts, LLI helps teachers match students with texts of progressing difficulty and deliver systematic lessons targeted to a student’s reading ability. LLI has been identified as meeting What Works Clearinghouse standards as an effective intervention.<sup>8</sup>

**Running Records and Miscue Analyses:** The report of the National Reading Panel identified the appropriateness of using running records or miscue analyses for assessment of fluency:

A number of informal procedures can be used in the classroom to assess fluency. Informal reading inventories (Johnson, Kress, & Pikulski, 1987), miscue analysis (Goodman & Burke, 1972), pausing indices (Pinnell et al., 1995), running records (Clay, 1972), and reading speed calculations (Hasboruck & Tindal, 1992). All these assessment procedures require oral reading of text, and all can be used to provide an adequate index of fluency.<sup>9</sup>

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<sup>6</sup> Ford, M. P., & Opitz, M. F. (2011). Looking back to move forward with guided reading. *Reading Horizons: A Journal of Literacy and Language Arts*, 50(4), 3.

<sup>7</sup> See for example, Gaffner, J., Johnson, K., Torres-Elias, A., & Dryden, L. (2014). Guided reading in first- fourth grade: Theory to practice. *Texas Journal of Literacy Education*, 2(2), 117-126.<https://eric.ed.gov/?id=EJ1110820>; Nayak G, Sylva K. The effects of a guided reading intervention on reading comprehension: A study on young Chinese learners of English in Hong Kong. *The Language Learning Journal*. 2013;41:85–103. Tobin KG, Calhoun MB. A comparison of two reading programs on the reading outcomes of first-grade students. *Journal of Direct Instruction*. 2009;9:35–46.

<sup>8</sup> [https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc\\_levelledliteracy\\_091917.pdf](https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc_levelledliteracy_091917.pdf)

<sup>9</sup> National Reading Panel Report, p. 3-9.

The Panel also reported positive findings of Reading Recovery training (pp. 2-39), which uses running records and miscue analyses.<sup>10</sup>

These positive outcomes are highlighted in a recent publication summarizing the evidence for the science of reading, *How the science of reading informs 21<sup>st</sup> century education*,<sup>11</sup> which reviews evidence on the science of reading by a team of researchers at the Florida Center for Reading Research (the academic home of the science of reading), an article also cited in the NCTQ paper. In the article, the research finding positive effects of Fountas and Pinnell’s Leveled Literacy Intervention and Reading Recovery – both of which use running records and miscue analyses as well as leveled texts, in conjunction with phonics and decoding instruction -- is acknowledged as among the only evidence on widely used programs that has met the standards of the What Works Clearinghouse of the Institute of Education Sciences.<sup>12</sup> The large positive effects for both programs are also noted in the American Institute of Research Intensive Interventions Clearinghouse.<sup>13</sup>

Our program teaches teachers and future educators how to use decodable texts, as advocated for in the NCTQ letter. Yet, we note that the *Science of Reading* article noted above bemoans the lack of evidence for such texts, stating that it is one of the common instructional approaches that lack generalizable empirical support. While the use of decodable texts may rest on sound theoretical and pedagogical grounds, “the only study to experimentally examine the impact of reading more versus less decodable texts as part of an early intervention phonics program for at-risk first graders found no differences between the two groups on any of the posttest measures (Jenkins et al., 2004).<sup>14</sup> Such a result does not rule out the possibility of the usefulness of decodable texts but rather it indicates the need to disentangle the active ingredients of effective interventions to specify what to use, when, how often, and for whom”

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<sup>10</sup> National Reading Panel Report, pp. 2-106; 2-119; 2-129-130.

<sup>11</sup> Petscher et al. (2020), *How the science of reading informs 21<sup>st</sup> century education*, p. 271.

<sup>12</sup> The evidence snapshots from the What Works Clearinghouse are here:

<https://ies.ed.gov/ncee/wwc/EvidenceSnapshot/420>; <https://ies.ed.gov/ncee/wwc/EvidenceSnapshot/679>.

<sup>13</sup> <https://charts.intensiveintervention.org/aintervention> citing Ransford-Kaldon, C. R., Flynt, E. S., Ross, C. L., Franceschini, L. A., Zoblotzky, T. A., Huang, Y. & Gallagher, B. (2010). *Implementation of Effective Intervention: An Empirical Study to Evaluate the Efficacy of Fountas and Pinnell’s Leveled Literacy Intervention (LLI)*. Memphis, TN: The University of Memphis, Center for Research in Educational Policy; Center, Y., Wheldall, K., Freeman, L., Outhred, L. & McNaught, M. (1995). An Evaluation of Reading Recovery. *Reading Research Quarterly*, 30() 240-263; Iversen, S. & Tunmer, W. E. (1993). Phonological Processing Skills and the Reading Recovery Program. *Journal of Educational Psychology*, 85() 112-126; May, H., Sirinides, P., Gray, A., & Goldsworthy, H. (2016). *Reading Recovery: An evaluation of the four-year i3 scale-up*. Retrieved from: <http://www.cpre.org/reading-recovery-evaluation-four-year-i3-scale>; May, H., Sirinides, P., Goldsworthy, H., Armijo, M., Sam, C., Gillespie, J. N., & Tognatta, N. (2015). Year One Results From the Multisite Randomized Evaluation of the i3 Scale-Up of Reading Recovery. *American Educational Research Journal*, 52(547-581); Schwartz, R. M. (2005). Literacy Learning of At-Risk First Grade Students in the Reading Recovery Early Intervention.. *Journal of Educational Psychology*, 97(2) 257-267.

<sup>14</sup> Jenkins, J. R., Peyton, J. A., Sanders, E. A., & Vadasy, P. F. (2004). Effects of reading decodable texts in supplemental first-grade tutoring. *Scientific Studies of Reading*, 8(1), 53-85.

(p. 8).<sup>15</sup> This in fact is why multiple vantage points on the process of learning to decode, comprehend, and develop fluency with text is so important for beginning teachers.

Finally, we note that the use of running records also appears in guidance from the What Works Clearinghouse, which synthesizes the highest quality evidence for practice in the field. The What Works Clearinghouse guide on *Foundational Skills to Support Reading for Understanding in Kindergarten through 3<sup>rd</sup> Grade*<sup>16</sup> includes a study of the University of Florida Literacy Initiative, which confirmed a set of successful reading practices that use running records.<sup>17</sup> The What Works Clearinghouse *Intervention Reports* also include studies of other successful interventions for struggling students that have used running records as part of the intervention process.<sup>18</sup>

Because of their value in helping teachers see the way in which students are reading – including what aspects of phonetic decoding are problematic for them -- the Institute for Education Sciences has sponsored training for learning to use running records.<sup>19</sup>

**Balanced Literacy:** The complaint seems to equate the idea of balanced literacy as equivalent to the “three cueing system” that allows “students to guess at words based on visual, semantic, and syntactical clues.” To be clear, this is not what Mills College and many others understand to be the meaning of balanced literacy. As the assignment for a balanced literacy lesson plan indicates, the goal of balanced literacy is to integrate reading, writing, language arts, and literature instruction so that students utilize what they learn from foundational skills instruction in multiple ways and contexts. This is consistent with the California ELA/ELD curriculum framework, which marries a strong emphasis on foundational skills for reading with emphases on expression and meaning making.

The National Reading Panel also discussed what Mills College at Northeastern University and many others identify as a balanced literacy approach:

Finally, it is important to emphasize that systematic phonics instruction should be integrated with other reading instruction to create a balanced reading program.

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<sup>15</sup> Petscher, Y., Cabell, S. Q., Catts, H. W., Compton, D. L., Foorman, B. R., Hart, S. A., ... & Wagner, R. K. (2020). How the science of reading informs 21st-century education. *Reading research quarterly*, 55, S267-S282.

<sup>16</sup> Foorman, B., Beyler, N., Borradaile, K., Coyne, M., Denton, C. A., Dimino, J., . . . Wissel, S. (2016). *Foundational skills to support reading for understanding in kindergarten through 3rd grade*. (NCEE 2016-4008). Washington, DC: U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance. [https://ies.ed.gov/ncee/wwc/Docs/practiceGuide/wwc\\_foundationalreading\\_040717.pdf](https://ies.ed.gov/ncee/wwc/Docs/practiceGuide/wwc_foundationalreading_040717.pdf)

<sup>17</sup> Lane, H. B., Pullen, P. C., Hudson, R. F., & Konold, T. R. (2009). Identifying essential instructional components of literacy tutoring for struggling beginning readers. *Literacy Research and Instruction*, 48(4), 277–297.

<sup>18</sup> See, for example, Taylor, B. M., Frye, B. J., Short, R., & Shearer, B. (1991). *Early Intervention in Reading: Preventing reading failure among low-achieving first grade students*. Minneapolis: University of Minnesota, Center for Urban and Regional Affairs and Office of the Vice President of Academic Affairs; [https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc\\_eir\\_app\\_112508.pdf](https://ies.ed.gov/ncee/wwc/Docs/InterventionReports/wwc_eir_app_112508.pdf).

<sup>19</sup> See <https://ies.ed.gov/ncee/edlabs/regions/midwest/pdf/eventslides/running-records-training-2-508.pdf>

Phonics instruction is never a total reading program. In 1st grade, teachers can provide controlled vocabulary texts that allow students to practice decoding, and they can also read quality literature to students to build a sense of story and to develop vocabulary and comprehension. Phonics should not become the dominant component in a reading program, neither in the amount of time devoted to it nor in the significance attached. It is important to evaluate children's reading competence in many ways, not only by their phonics skills but also by their interest in books and their ability to understand information that is read to them. By emphasizing all of the processes that contribute to growth in reading, teachers will have the best chance of making every child a reader. (p. 2-97)

Through thorough assessment of the concerns raised by Decoding Dyslexia, and alignment with the California curriculum framework and its TPEs, Mills College strongly believes that our program is evidence-based, responsive, and will adequately prepare teachers and future educators to impact education in the state of California. Mills College at Northeastern commits to remaining in contact with the CCTC and providing educational programming that prepares educators to satisfy the CCTC's Teacher Performance Expectations.

Should you have any further questions for Mills College at Northeastern University, please do not hesitate to contact Tomás Galguera at [t.galguera@northeastern.edu](mailto:t.galguera@northeastern.edu).

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Jackson', with a long horizontal flourish extending to the right.

Mike Jackson, Vice Provost of Curriculum and Programs