



California Council on Teacher Education

May 16, 2024

Commission on Teacher Credentialing
State of California
1900 Capitol Avenue
Sacramento, CA 95811-4213

Via email: accreditation@ctc.ca.gov

RE: Compliance Concerns raised by Decoding Dyslexia, California Reading Coalition, and Families in Schools + (DD, CRC, FIS+ Consortium)

Dear CTC Executive Director Mary Sandy and Esteemed Members of the Committee on Accreditation:

On behalf of the Board of Directors of the California Council on Teacher Education (CCTE), the largest and most comprehensive professional organization for educator preparation in the state, we are again writing to voice our concern over the compliance complaint raised against Mills College at Northeastern University (MC:NU) regarding the Commission on Teacher Credentialing (CTC) unanimous program approval of NC:MU's preliminary multiple subject program. At the April 19th, 2024, CTC Meeting, we were pleased to witness the Commissioners unanimously make the highly appropriate decision to send this complaint back to the Committee on Accreditation (COA). We now ask that the COA at its upcoming June meeting uphold the approved accreditation of MC:NU given the following concerns which we expressed in our original letter last month.

We have three major areas of concern with respect to the complaint. The first concern we have is with the lack of understanding shown by the organizations raising their concerns regarding California's credentialing and accreditation process. An educator preparation program which is seeking accreditation from any independent accrediting body must be held to the standards of that accrediting body and not the standards of another accrediting or evaluation body. As the Commission is well aware, educator preparation programs intending to recommend qualified candidates for a California credential must successfully complete the accreditation process established by the CTC, with approval from the Committee on Accreditation. National assessments of educator preparation programs by organizations like the National Center on Teacher Quality (NCTQ) are separate evaluations and are fully optional for educator preparation programs in California. One major concern raised by the complainant organizations (henceforth the DD, CRC, FIS+ Consortium) in the case under consideration is that the MC:NU program should lose its accreditation from CTC because it incorporates practices categorized by NCTQ as "unacceptable." Yet these same criteria are not present in CTC accreditation requirements and therefore MC:NU could not have anticipated the need to address these additional criteria which are irrelevant to the approval received by CTC.

The CTC requirements state that programs must **include** "the specific content of EC §44259 (b)(4) (A) and (B) and therefore requires that teacher preparation programs for Multiple Subject, Single Subject in English, and Education Specialist credentials include the study of effective means of teaching literacy, including "evidence-based means of teaching foundational reading skills in print concepts, phonological awareness, phonics and word recognition, and fluency to all pupils, including tiered supports for pupils with reading difficulties, English learners, and pupils with exceptional needs." Unlike the NCTQ standards which are **exclusionary** and list specific "unacceptable" practices, the CTC has adopted an inclusive approach to literacy and reading instruction which honors the complexity, breadth, and depth of literacy and reading instruction and research, particularly for the varied contexts in which educator preparation occurs in our state and specifically because of the culturally, linguistically, and racially diverse students our future educators will teach.

Again, to be clear, our first point of concern is that a STATE accredited program cannot be challenged based on the requirements or expectations of a separate organization (at a different level not required

—continued on next page—

President (2026)
Karen Escalante
California State University, San Bernardino

President-Elect (2026)
Terrelle Sales
Pepperdine University

Vice-President for AACTE (2026)
Kimberly White-Smith
University of San Diego

Vice-President for ATE (2026)
Michele McConnell
California State University, Fresno

Past President (2026)
Betina Hsieh
University of Washington

Board of Directors
Kara Ireland D'Ambrosio (2025)
San Jose State University

James Fabionar (2027)
University of San Diego

Nirmala Griarte Flores (2027)
California State Polytechnic University Pomona

Reyna Garcia Ramos (2026)
Pepperdine University

Nat Hansuvadha (2026)
California State University, Long Beach

Antoinette Linton (2025)
California State University, Fullerton

Kimiya Sohrab Maghzi (2027)
University of Redlands

Daniel Soodjinda (2025)
California State University, Stanislaus

Juliet Michelsen Wahlechner (2026)
California State University, Fresno

Teacher Education Quarterly
Reyes L. Quezada, Editor
University of San Diego

Issues in Teacher Education
Allison Smith, Editor
University of Massachusetts Global

CCNews
Terrelle Sales, Editor
Pepperdine University

Association of California Community College
Teacher Education Programs
Megan Kaplinsky, President
Long Beach City College

Association of Independent California
Colleges and Universities, ED
Deborah Erickson, President
Point Loma Nazarene University

California Alliance for Inclusive Schooling
Donald Cardinal, Co-Chair
Chapman University

Marquita Grenot-Scheyer, Co-Chair
California State University, Long Beach

California Alliance of Researchers
for Equity in Education
Ruchi Rangnath, Executive Director
University of San Francisco

California Association for Bilingual
Teacher Education
Eduardo Munoz-Munoz, President
San Jose State University

California Association of Professors
of Special Education
Nat Hansuvadha, President
California State University, Long Beach

California Association of School-University
Partnerships
Jan Zoller, President
Fresno Pacific University

CEEDAR Center
Linda Blanton, Representative
University of Florida

Center for Reaching and Teaching
the Whole Child
Nancy Lourie Markowitz, Executive Director
Supervisors of Teacher Education Network Team

Lisa Sullivan, Team Lead,
University of California Davis

Executive Secretary
Alan H. Jones (2025)
3145 Geary Boulevard, San Francisco 94118
alan.jones@ccte.org

Co-Assistant Executive Secretaries
Monica Boomgard
California State University, Northridge

Deborah Hamm
California State University, Long Beach

by the state). To suggest otherwise shows a distinct lack of understanding of the professional accreditation process according to the California Educational Code (EC § 44225) which allows the CTC to determine a set of professional standards for each of California's educator preparation credential programs.

Our second major area of concern is with respect to the contention that the MC:NU program's reading instruction is not supported by research or not evidence based. While NCTQ only recognizes particular bodies of research that focus on foundational literacy practices which emphasize phonics and phonemic awareness, there is a large body of research dating back over 35 years (Duke et al., 2011; Pearson et al., 2016)—but also including recent empirical studies (Wyse & Bradbury, 2022) in literacy and reading—that focuses on meaning making and incorporates principles of guided reading and balanced literacy as a part of robust reading instruction (that also incorporates principles of structured literacy in alignment with the California dyslexia guidelines), particularly in encouraging higher level reading comprehension (Bitter et al., 2009). Our contention is not with the incorporation of principles consistent with Senate Bill 488 and California Education Code 44259 (b)(4)(A) and (B) which, evident even in the course syllabi themselves, were submitted to and approved by the CTC accreditation review, but rather it is the complainants' invocation of exclusionary criteria which form the basis of what the DD, CRC, FIS+ Consortium then call "debunked balanced literacy practices" which arise because they selectively identify and refer to certain research rather than recognize a broader and balanced view of all available research.

Finally, as a professional organization made up of diverse teacher educators representing a wide breadth of teacher education programs across California (including the UCs, CSUs, and independent colleges and universities) we value the voices of advocacy organizations and believe in the importance of partnership and collaboration to ensure high quality teachers and reading instruction for all students. But we believe this complaint demonstrates an attempt to undermine California's rigorous education preparation accreditation processes by organizations and individuals clearly unfamiliar with those processes and procedures who seek to disrupt our state's well-established system for review and evaluation of teacher preparation programs. This challenge represents an alarming lack of respect for the professionalism of CTC and its site accreditation teams, who are trained professionals from the field of educator preparation who are required to go through both intensive training and then engage in extensive examination of programs undergoing certification. The lack of respect for the professional work of teacher education and teacher certification shown by the DD, CRC, FIS+ Consortium is of extreme concern, and threatens to move all of our work away from the important shared goals of supporting quality instruction and teacher certification in the state. As an organization CCTE cannot stand by and allow this to occur.

On behalf of the California Council on Teacher Education we thank you again for taking our serious concerns into account.

Sincerely,



KAREN ESCALANTE

President, California Council on Teacher Education

on behalf of the CCTE Executive Committee and Board of Directors

karen.escalante@csusb.edu

Assistant Professor, Watson College of Education, California State University San Bernardino

The contents of this message was approved by the CCTE Board of Directors on April 2, 2024.

References:

- Bitter, C., O'Day, J., Gubbins, P., & Socias, M. (2009). What works to improve student literacy achievement? An examination of instructional practices in a balanced literacy approach. *Journal of Education for Students Placed at Risk, 14*(1), 17-44
- Duke, N. K., Pearson, P. D., Strachan, S. L., & Billman, A. K. (2011). Essential elements of fostering and teaching reading comprehension. *What Research Has to Say About Reading Instruction, 4*(1), 286-314.
- Pearson, P. D., Kamil, M. L., Mosenthal, P. B., & Barr, R. (2016). *Handbook of reading research*. Routledge.
- Wyse, D., & Bradbury, A. (2022). Reading wars or reading reconciliation? A critical examination of robust research evidence, curriculum policy and teachers' practices for teaching phonics and reading. *Review of Education, 10*(1), e3314.