



June 2, 2024

Commission on Teacher Credentialing
651 Bannon Street, Suite 600
Sacramento, CA 95811

Via email: accreditation@ctc.ca.gov

RE: **Agenda Item 21**: Potential Reconsideration of Initial Program Approval for Mills College at Northeastern University's Preliminary Multiple Subject Program After Remand by the Commission

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

We are writing to express our concern that the Committee on Accreditation and the Commission on Teacher Credentialing are failing to meet the statutory duties required under EDC [Section 44259.5](#). The statutory requirement that “effective means of teaching literacy” be “evidence-based” pursuant to Section 44259(b)(4) requires CTC to ensure that institutions of higher education are not including instructional practices that are contrary to research. Sections 44259(b)(4) and 44259.5 also require that teaching standards are aligned to the current English Language Arts/English Language Development (ELA/ELD) Framework adopted by the state board and that CTC ensures that a teacher preparation program meets those standards.

Certain instructional practices being taught in the Mills:NU preliminary multiple subject program are not supported by evidence and do not align with the current framework. In our letter dated 2/20/2024, we submitted over 60 peer-reviewed research studies that support that indirect, three-cueing instruction is unpredictable in its impact on word reading and leaves too much to chance. This type of instruction is embedded in the Mills:NU program, as evident in the course syllabi for EDUT 6106.

As pointed out in our previous letter, the 2015 **CDE Resource for Implementing the ELA/ELD Framework** specifically states that “it is crucial that students are taught to monitor their understanding as they decode words in connected text. All students need to know that text should make sense and convey meaning. Contextual analysis can be used to verify the accuracy and fit of the word in the sentence or larger discourse. Contextual analysis, however, should not be relied upon to identify the word.”

“In their haste, students may guess at words, use only partial alphabetic decoding, or draw exclusively on other cues, such as context or images. Doing so regularly results in less practice with the full alphabetic decoding that is necessary for building the accuracy and automaticity with word identification (i.e. word reading) that will serve readers well at present and over time.”

(Source: <https://www.cde.ca.gov/ci/rl/cf/documents/foundskillswhitepaper.pdf>, pages 11 and 14)

We disagree with the [Mills:NU letter](#) where it states on page 3C-14:

“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.”

To the contrary, multiple required course readings reflect instructional practices based on a three-cueing approach. Mills:NU required course reading by **Scholastic** on “**How to Take Running Records**” from course syllabi EDUT 6106, as well the Fountas & Pinnell required course readings promote instructional practices based on three-cueing using meaning, structural, and visual cues for word identification that encourages guessing versus full alphabetic decoding. For example, page 75 of Fountas, I.C., & Pinnell G.S. (2017). **Guided Reading: Responsive Teaching Across the Grades**, instructs teachers to encourage students to guess words that have been covered in sticky notes and invite “the children to use problem solving to predict and confirm the word. The text describes, “they (the students) predict the word using language structure and meaning and also may predict the first letter or letter cluster...”. An example states, “predicting the word *bike* and the first letter helps students focus on the letter *b*” (**see attached Attachment A and B**).

In addition, please find attached an email dated 2/20/2024 from Scholastic stating that Scholastic no longer supports Guided Reading, including the use of running records.

The course syllabi for EDUT 6106 include the Scholastic article, “How to Take Running Records” as a required course reading (see **Attachment B and D**).

According to “[Reading and the Three Cueing Systems](#)” by the [Southwest Educational Development Laboratory](#) (SEDL) (which merged with the [American Institutes for Research](#) (AIR)):

“Teachers everywhere are familiar with the Three Cueing Systems model of reading, and influences of this model can be found in many of the most popular reading programs and instructional approaches, such as Reading Recovery and Guided Reading. According to this model, there are three cues that every good reader depends upon to decode words in running text. The first and most important cue is semantics—there are some words that make sense in the context of the text and other words that do not. Supporters of this model claim that good readers make use of contextual information to “guess” or “predict” each word in a passage of running text. The second cue is syntax—some words are semantically appropriate but can be ruled out because of syntactic constraints. The third and least important cue, according to this view, is graphophonemic or letter-sound information. According to the Three Cueing Systems model, the grapho-phonemic cue is only used to “confirm” predictions that are made based on semantics and syntax.”

“The Three Cueing Systems model suggests that when a child is reading running text and comes upon a word that is difficult to read, the child should first try to guess what the word is based upon the context (including pictures, if there are any). Secondly, the child should try to guess what the word is based upon syntax (is it a verb, a noun, etc.), and finally, if the other two cueing systems fail to provide an appropriate word, the child should focus on the letters of the word and try to “sound it out.” (Even then, some would suggest that the child should only look at the first letter of the word, and use that information to make a more “educated guess”).” (Source: “[Reading and the Three Cueing Systems](#)”)

We are again attaching over 60 peer-reviewed studies that support that “direct, systematic instruction helps students develop the skills they need to become strong readers. Indirect, three-cueing instruction is unpredictable in its impact on word reading and leaves too much to chance” (See [Attachment C](#) from original complaint).

We would also like to address the claim that Fountas & Pinnell Leveled Literacy Intervention (LLI) is somehow “evidence-based” because it appears in What Works Clearinghouse (WWC).

The issues outlined in our complaint letter included concerns about the various Fountas & Pinnell required reading materials (see complaint letter dated 2/20/2024). It should be noted that LLI is an intervention program that is reviewed in WWC and is not the same thing as the required text readings in the MC:NU course syllabi (see complaint letter and Attachment A of this letter for details), however, these required texts do support the same flawed teaching methodologies that are reflected in the intervention program.

It should be noted that WWC did not find positive outcomes on alphabets in its review of [LLI](#) (see **Attachment E**). WWC defines “[alphabets](#)” as phonemic awareness, phonological awareness, letter identification, print awareness, and phonics.

Also, while one of the course syllabi (See Attachment A of complaint letter for EDUT 6106) did include required reading for **Gillis & Eberhardt, Phonemic Awareness and Phonics (pp 40-58)**, the guidance provided in this required text cautions against the various proposed balanced literacy instructional strategies proposed in the Fountas & Pinnell and Scholastic required readings. See specifically page 57:

“A word about leveled readers

Leveled readers, the type of text used in guided reading and many core reading programs, can contribute to a practice in which teachers skip an integral stage of reading development—that is, Stage 1, the Alphabetic Stage. (See Chall’s Stages of Reading Development chart on page 2.) The pervasive use of the three cueing systems with leveled readers short changes students by not providing them an opportunity to focus on the essential skill of learning the alphabetic principle to break the code.”

We reiterate that we are very concerned that the Committee on Accreditation and the Commission on Teacher Credentialing is failing to meet its statutory duties required under EDC [Section 44259.5](#). Specifically, “the commission shall ensure that an accredited program of professional preparation offered pursuant to paragraph (3) of subdivision (b) of Section 44259 satisfies standards established by the commission for the preparation of teachers for all pupils, including English language learners.” See also “the commission shall ensure that the standards established pursuant to this subdivision are aligned with the requirements of subparagraph (A) of paragraph (4) of subdivision (b) of Section 44259 and Section 60200.4.” Allowing credential programs such as MC:NU to provide contradictory instructional practices, some of which are supported by research and others that have been debunked by cognitive scientists years ago, will only serve to create confusion for teaching credential candidates and also does not meet the threshold of “evidence-based”; alignment with existing Domain 7 literacy

teaching standards; and alignment with the existing ELA/ELD framework which are required under EDC [44259\(b\)\(4\)](#).

Respectfully submitted,



Lori DePole
Co-State Director



Megan Potente
Co-State Director

Cc: Members of the Commission on Teacher Credentialing
[Attachment A](#) - page 75 of Fountas, I.C., & Pinnell G.S. (2017). Guided Reading: Responsive Teaching Across the Grades

[Attachment B](#) - Scholastic, "How to Take Running Records"

[Attachment C](#) - "10 Maxims: What We've Learned So Far About How Children Learn to Read", Maxim 7, peer-reviewed research studies

[Attachment D](#) - Scholastic email

[Attachment E](#) - What Works Clearinghouse, accessed April 15, 2024 from <https://ies.ed.gov/ncee/WWC/InterventionReport/679>



Leveled Literacy Intervention

Beginning Reading

Leveled Literacy Intervention had positive effects on general reading achievement, potentially positive effects on reading fluency, and no discernible effects on alphabets for beginning readers.

Leveled Literacy Intervention (LLI) is a short-term, supplementary, small-group literacy intervention designed to help struggling readers achieve grade-level competency. The intervention provides explicit instruction in phonological awareness, phonics, fluency, vocabulary, reading comprehension, oral language skills, and writing. LLI helps teachers match students with texts of progressing difficulty and deliver systematic lessons targeted to a student's reading ability.

Findings

2 STUDIES THAT MET STANDARDS OUT OF

10 ELIGIBLE STUDIES REVIEWED

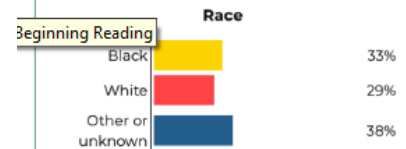
Outcome domain	Effectiveness Rating	Grades	Evidence Tier
Alphabets	0	K-2	NO TIER ASSIGNED
Reading achievement	++	K-2	TIER 1 STRONG
Reading Fluency	+	K-2	TIER 3 PROMISING

Last Updated: September 2017

Download Intervention Report 863 KB



Summary of all Research Settings and Samples that Met Standards



Gender



Free & Reduced-Price Lunch



English Learners

