



June 28, 2023

Illinois State Board of Education
Board Members
100 N. 1st St.
Springfield, IL 62777

Re: Literacy Plan Feedback

Dear Board Members:

Thank you for your dedication to drafting a thoughtful, inclusive, comprehensive state literacy plan. We are grateful for your staff's investment in this project. The Illinois Early Literacy Coalition is a group of hundreds of parents, educators, and literacy advocates who believe every student deserves access to high-quality, evidence-based literacy instruction that prepares them for a successful future. We believe literacy is not just one of many things that a public education provides – but it is the single most important thing, a civil right to which every student is entitled.

Below, we have outlined five considerations for you in response to the first draft of the statewide literacy plan:

1. Provide a clear focus, vision, and articulation of the problem from ISBE.
2. Be upfront about the terminology you are (or are not) using and why.
3. Prioritize the plan being helpful, actionable, and user-friendly to all stakeholders – rather than overwhelming or evasive.
4. Address the importance of other special student populations.
5. Leverage all the tools in your capacity to give the plan “teeth” and outline future plans to secure more such “tools.”

We know the plan will look considerably different at the end of the long public comment process you have planned, and we hope you will consider this constructive feedback.

Provide a clear focus, vision, and articulation of the problem from ISBE.

You have done an admirable job including stakeholders who approach literacy from varied perspectives and with different priorities, so it is not surprising that the first draft lacks a clear and cohesive agency vision, includes some contradictory statements, and needs some streamlining. Your challenge in the next few months is to sift through this mountain of input to put your stamp of ownership – with leadership and vision from the top of the agency – on a concise plan that includes a clear vision and roadmap for how you will lead Illinois toward improving literacy outcomes for students and closing

opportunity gaps among demographic groups of students. Consider these priorities as you work on this next step:

1. **Identify the problem clearly.** While the current draft acknowledges the need to “identify obstacles” and “recognize the attachment some teachers may feel towards a specific activity or curriculum,” at its heart, it misses the headline: we have a systemic problem. Deficiencies in educator preparation and professional development, curriculum, and oversight have hampered quality literacy instruction, assessment, and intervention in Illinois schools. To move forward, a comprehensive plan must address those problems from a change management perspective, acknowledging not just the logistical issues, but the cultural factors that are necessary to build buy-in to reformed literacy instruction, assessment, and intervention across Illinois.
2. **Identify actionable goals.** Highlight from the beginning of the plan what success looks like, how the plan will yield improved literacy outcomes, and what timeframe you are looking at to achieve these goals. Since the agency has extended its current strategic plan an additional year, it is timely to consider literacy goals as a component of this plan that you can adopt in your 2025-2030 strategic plan. Likewise, incorporating a logic model at the beginning of the plan would demonstrate clearly where we want to go and how the plan will help get us there.
3. **Provide clarity and accuracy at all levels.** People will read this with differing needs – from school board members and parents who may need just a high-level summary, to practitioners who want detailed information in appendices. There should be bite-sized options to consume for those who just need that level of detail, and more for those who need more detail:
 - The “Ten Maxims” (Reid Lyon) is a great example of a clear way to outline what matters in literacy instruction. Elevating those maxims to the body of the document would concisely convey that information.
 - In addition, or alternatively, ISBE could develop its own list of ten principles – some of which would be similar, but others of which can highlight the values of state and regional systems that are necessary to drive statewide literacy improvement.
 - Charts and infographics would be useful additions – particularly in the screening and assessment section; however, the chart on page four has a lot of problems (e.g., conflating oral language development and reading fluency, suggesting reading fluency is an appropriate focus in preK-K, and implying that phonemic awareness should be developed into high school). It would be hard to edit it when there are surely better models available from which to start.
4. **Tweak some existing language in the introduction for accuracy.** Specifically, there are several things in the current introduction that should be improved or strengthened:
 - Modify the definition of “literacy” to explicitly reference “reading,” including the abilities of word recognition and language comprehension. (We appreciate that this is a “literacy plan,” which is much broader than just “reading;” however, we cannot ignore reading within the definition.)
 - Add among your “we believe” statements that strong readers need strong foundational skills.

- Strengthen the definition of “evidence-based practices.” The idea that “any concept or strategy that is derived from or informed by educational research” is an evidence-based practice leaves a lot of wiggle room for unproven practices to be considered “evidence-based.” Here’s our suggestion: “Evidence-based practice” refers to methodologies that have been shown, through externally and independently validated research, to effect positive educational results in a predictable manner on a particular population. Evidence-based practices meet a higher standard of evidence than research-based practices.” It would be fair to add a disclaimer that this is a high bar; if there are evidence-based practices, they should be used. But there are important areas of literacy instruction where there may not be practices that meet this standards, and in those cases, it is important for educators to use their professional judgment based on available research.
- In general, more clearly articulate, reference, and cite from the vast body of interdisciplinary research about reading acquisition and issues related to reading and writing, both throughout the document and in the works cited at the end.

Be up front about the terminology you are (or are not) using and why.

You are clearly trying to avoid terms that are already in widespread use throughout Illinois and beyond: structured literacy, balanced literacy, science of reading, whole language, and others. Avoiding these terms will only create confusion as practitioners and other stakeholders try to understand why the terms they are hearing on a daily basis are not found anywhere in this document. Instead of avoiding them altogether, at least define these terms at the outset of the document and, if you are making a choice not to use them, explain why.

For example:

- “The ‘science of reading’ is a vast, interdisciplinary body of scientifically-based research about reading acquisition and issues related to reading and writing. This research spans the world across decades, has been conducted across thousands of studies in multiple languages, and pertains to all areas of reading. We have chosen not to use the phrase ‘science of reading’ throughout the document because the term has grown polarizing amid misconceptions that it refers only to phonics or implies a narrowing of curriculum, which is not actually consistent with its definition,” and
- “‘Balanced literacy’ is an approach developed in the 1990s intended to balance the benefits of phonics instruction with whole language. Any evidence-based literacy instruction program must include an appropriate balance among multiple elements; however, the term “balanced literacy” is interpreted in different ways, some of which are aligned with evidence and others of which are not. One practice found in many balanced literacy programs, which is not evidence-based, is “three-cuing,” where students are encouraged to consider multiple word recognition strategies when they come to an unknown word, rather than prioritizing the sound/symbol correspondence as the word recognition strategy, with context clues appropriate only as a comprehension or vocabulary strategy after the word has been identified. Another practice found in many balanced literacy programs that is also not evidence-based is the practice of grouping early readers instructionally by reading ‘level’ rather than by the particular skill they are working on. Because

of the lack of consistency of interpretation of this term, we are choosing not to use it in this document."

Prioritize the plan being helpful, actionable, and user-friendly to all stakeholders – rather than overwhelming or evasive.

Administrators and instructional leaders responsible for choosing and implementing curriculum should be able to find clear guidance in this document for how to evaluate their current curriculum and instruction, make decisions about whether it is aligned with evidence or not, and determine next steps. Teachers should be able to find in this plan tangible examples of literacy blocks and instructional routines that are aligned with the evidence, as well as those that are not. Parents should be able to read this document and understand what constitutes evidence-aligned literacy instruction, what does not, and how to determine whether their children's school or district is aligned with this evidence or not.

Educators should be able to pick up this plan and find it inviting and helpful, rather than overwhelming and confusing. If there are polarizing ideas, it is better to address them explicitly, rather than avoiding them. Literacy instruction is complex and the document honors that complexity, but it should also aim to break down barriers and put a stake in the ground about what high-quality literacy instruction really looks like.

For example:

- Explicitly say that the alphabetic code should be prioritized for word recognition over any other "cues," with context and visual clues appropriate for a secondary layer of checking for comprehension.
- Describe *how the brain learns to read* and the process of *orthographic mapping*, along with how strategies that bypass the process of connecting sounds to symbols to meaning (like memorizing long lists of sight words as units without first attending to the graphemes, deprives emerging readers of the opportunity to orthographically map them and strengthen the developing neural pathways in the brain).
- Clarify that nonsense words are valuable for assessment purposes and appropriate for intervention for students with decoding deficits, but not a good use of instructional time for English learners.
- Emphasize the importance of building content knowledge in strengthening literacy comprehension, rather than just focusing on narrow comprehension strategies. Thus, cutting science and social studies content to make room for longer literacy blocks is often counterproductive. On the other hand, rich discussion and writing about science and social studies in those classes also strengthens literacy.
- Provide examples of a variety of literacy block schedules, along with some discussion about what factors to consider when determining the best structure.
- Provide examples of best practices for grouping students in small groups according to the skills they are working to achieve.

- recognize those students who have language based learning differences and disabilities such as dyslexia, processing disorders and are twice exceptional and tier 1-3 curriculum and instruction should be seamless along with early identification and intervention
- Create a clear flowchart or infographic for screening and assessment. We understand you cannot name specific products, but it would be especially helpful to describe what critical skills should be assessed at each grade level.
- The questions in Section 4 would lend themselves more toward a supplemental workbook for local educators to consider as they approach literacy program changes, rather than a list in the body of the document.

Address the importance of other special student populations.

While most sections include references to English learner (EL) populations, other student populations are rarely mentioned. This includes bidialectal students, students with dyslexia, and twice-exceptional students.

ELs themselves are referenced as a homogenous group. ELs need the same foundational skills as all emerging readers, but they need significantly more attention to oral language development and vocabulary. Teaching reading to a student who has already learned to read in an alphabetic language is distinct from emerging bilinguals who have never learned to read in any language.

The unique strengths and needs that bidialectal students bring to literacy learning are often overlooked, but deserve to be recognized and specifically addressed in this plan. Dr. Julie Washington is a leading researcher in this area and we would recommend at least including her work in the tools section, and potentially incorporating her chart of characteristics of African-American English more prominently.

Students with dyslexia deserve a specific section that contextualizes the dyslexia handbook instead of just including a passing reference to it. We know that many students who struggle to read do not have dyslexia and we have strongly supported a plan that is comprehensive and inclusive; at the same time, a plan that does not include any specific discussion about students with dyslexia is not inclusive.

Leverage all the tools in your capacity to give the plan “teeth,” and outline future aspirations to secure such “tools.”

One consistent theme throughout the process so far is the question of how to ensure that stakeholders find the plan relevant and have some incentive to use it. A phenomenal plan that sits on a shelf will not be effective in improving literacy outcomes. While we know there are limitations to what the plan can (or should) mandate, we believe there is room to strengthen the provisions:

1. **Identify within the agency an organizational structure that elevates literacy.** The team that has worked on this plan has been incredible! The expertise, passion, dedication, and leadership this group has contributed to the effort so far has been unparalleled. As the plan moves to its next phase, we hope ISBE will consider its organizational structure to ensure that there are point people in charge of implementation so that this is not a one-time project that falls off people’s

priority list. The literacy point people should work closely with the staff in the divisions of assessment, curriculum, and special education.

2. **Strengthen your oversight of Educator Preparation Programs.** ISBE has the authority under current law to strengthen the process for reauthorizing Educator Preparation Programs. There is widespread agreement that your standards for these programs are high-quality. However, there remains a disconnect between these standards and the instruction many of these programs provide. ISBE can begin requiring programs to submit syllabi of reading methods courses and other courses that demonstrate alignment to ISBE's high-quality standards.
3. **Strengthen oversight of special education laws that pertain to struggling readers, writers, and speakers.** There are inherent inequities in a system where students who struggle the most are those least likely to have families with the privilege, education, and resources to support their students at home, pay for professional tutoring, and hire lawyers to get their children the supports they need in their public schools.
4. **Make a case for dedicated State literacy funding.** Some tools, such as state funding for regional literacy coaching hubs, grants to schools that commit to overhaul outdated programs, or grants to teachers to support their professional development would require legislative approval; however, the plan could outline how such funds would be useful and make a case for their appropriation.
5. **Use your bully pulpit.** Elevate success stories of districts that have transformed their literacy programs, and employ other creative mechanisms for sharing resources, best practices, and case studies to help schools collaborate and learn from each other to improve literacy outcomes. Create and sustain professional learning communities for teachers and school leaders to network with colleagues across the state who are actively working to overhaul or improve their literacy programs.

Thank you again for the opportunity to weigh in on the first draft of the plan. We look forward to continuing partnering with you and other stakeholders throughout this process.

Sincerely,

Members of the Illinois Early Literacy Coalition