

March 28, 2024

The Honorable Al Muratsuchi
Chair, Assembly Education Committee
1020 N St, Suite 159
Sacramento, CA 95814

SUBJECT: AB 2222 (Rubio)

POSITION: Oppose

Dear Assemblymember Muratsuchi:

The California Teachers Association **opposes** AB 2222 (Rubio), which requires adherence to a narrow and problematic definition for “science of reading.” The science of reading is an expansive and evolving body of research, and not a one-size-fits-all approach that this bill seeks to codify. In our state, literacy instruction is already rooted in an understanding of the science of reading and decades of research that serve the needs of the most diverse set of students in the country. Our concerns surrounding this bill fall into four topic areas: curriculum and instruction, credentials and professional development, language acquisition, and assessment and testing.

1. Curriculum and Instruction

AB 2222 is flawed because it assumes all students learn in the same way. Placing a definition for “science of reading” in statute is problematic because research on reading instruction is not static and it can and should change over time if we are to grow in our knowledge. This bill would not allow continuous improvement and change. It would carve into stone scientific knowledge that by its very nature is constantly being tested, validated, refuted, revised, and improved. Defining what “science of reading” is not while requiring adherence to what is proposed limits the flexibility for teachers to meet the individual and diverse needs of students and is not based on research. We want all kids to succeed – we need more tools not fewer.

The bill does not even have a consistent definition of “science of reading.” In the findings portion of the bill, an assertion is made that, because of decades of interdisciplinary research, “science of reading” is defined as “explicit and systemic instruction with phonemic awareness, phonics, vocabulary, fluency, comprehension, and writing.” However, in section 10 of the bill, the definition of “science of reading” is further defined as including an explanation of why some students have difficulty with reading and writing, emphasizing the role of oral language and home language development, and makes it illegal to teach word recognition with meaning, structure and syntax, visual cues. Terms like “visual cues” are not defined in the bill, which may lead to confusion around whether pictures in children’s picture books are allowed, and this confusion will most certainly lead to uneven implementation across the state. Poor

implementation of prior “refreshes” of the core curriculum in some school districts drain the joy from teaching and learning and push good educators out of the teaching profession.

California’s English Language Arts/English Language Development (ELA/ELD) framework should continue to serve as our guide for literacy. Requiring stakeholders to change direction would further impact their ability to implement the ELA/ELD framework and would waste valuable time and resources already dedicated to improving literacy for students. By providing a narrow definition and “science of reading,” this proposal handcuffs the Instructional Quality Commission (IQC) by limiting what instructional materials may be approved. The IQC develops and recommends curriculum frameworks, criteria for evaluating instructional materials submitted for adoption, instructional materials that have been submitted by publishers, and implementation of the state’s academic content standards. Importantly, of the 13 members appointed to the IQC by the State Board of Education (SBE), at least seven of the 13 must be current K–12 classroom teachers, mentor teachers, or both. A majority are teachers.

CTA works to ensure that state commissions, councils and advisory groups which are formed for the purpose of addressing educational issues be comprised of a majority of teachers directly affected by the work of those bodies. Teachers possess firsthand experience and expertise in the field of education; they understand the complexities of teaching and learning, the challenges faced by educators and students, and the dynamics of classroom environments. As such, their perspectives are invaluable in shaping education policies and practices. Teachers are on the front lines of education, interacting with students daily and witnessing the impact of policies and decisions in real time. Their insights into the practical implications of educational initiatives can help ensure that policies are grounded and effectively address the needs of students and educators. Having teachers play a prominent role in these decisions enhances the credibility and legitimacy of the work, increasing public trust in the decisions made. Additionally, the experiences teachers have working with students from different socioeconomic, cultural, and linguistic backgrounds can help ensure that policies are inclusive and equitable. Teachers are deeply invested in the success and well-being of their students. Their primary concern is ensuring that every student has access to a high-quality education that prepares them for success in school, careers, and life.

2. Credentials and Professional Development

AB 2222 represents a top-down approach of mandates regarding the Statewide System of Support. The bill requires the California Department of Education (CDE) to designate a county office of education, or a consortium of county offices of education to serve as the state literacy expert for purposes of administering and supporting professional development and training. CTA believes it is the right of all certificated staff to participate in meaningful, teacher-driven professional development. For professional development to be successful, teachers must be primarily involved in determining what content will be delivered, where, by whom, how the content will be provided, and what incentives, resources and support will be dedicated to it. We also believe teachers must be primarily involved in implementing and evaluating the content of professional learning offerings.

Professional development should be determined locally, to allow schools to tailor professional development programs to meet the specific needs of their teachers, students, and community. Each school may face unique challenges or have specific goals, and needs can vary significantly from one community to another and may change over time. In the top down, statewide mandate approach of AB 2222, the professional development requirements do not reflect the values, priorities, and cultural context of the local community. It makes good policy sense for teachers to receive training that is culturally responsive and relevant to the needs and experiences of their students. Locally determined professional development enables schools to adapt quickly to evolving circumstances, ensuring that teachers receive relevant training and support. Often, professional development programs are closely aligned with the goals and priorities of the school or district. When determined locally, professional development activities can directly support the school's mission, vision, and strategic objectives, enhancing coherence and effectiveness. Perhaps most importantly, locally determined professional development encourages collaboration among teachers, administrators, and other stakeholders within the school community. Teachers can share best practices, collaborate on instructional strategies, and learn from one another in ways that are meaningful and relevant to their context. When teachers and administrators have a voice in determining their professional development needs and activities, they are more likely to feel ownership and buy-in, which leads to increased engagement and motivation to participate actively in professional learning opportunities.

When leadership in a school community identify areas of professional learning most needed and desired by educators, we can help ensure that professional learning is not disconnected from practice and supports the areas of knowledge, and skills educators want to develop to best meet the needs of their students. The professional development requirement in the bill will be very costly, and the bill does not have an appropriation. CTA believes that any professional development which is offered beyond the contracted working day should compensate the educator pro rata pay for the extra time involved. Further, CTA believes full funding is essential in implementing any professional development activity, which should be bargained to determine the scope, content, and form of in-service training in the district. Provisions must be made for the implementation of professional development during release time, minimum school days, or at other times with appropriate compensation.

In 2022, the Commission on Teacher Credentialing (CTC) updated the Literacy Program Standards and Teaching Performance Expectations (TPEs) to include elements that aligned with science of reading, so it is unnecessary to require teacher candidates and teacher credential holders to do duplicative work before entering a credential program or before entering the teaching profession. In 2015, the CTC adopted teacher education standards aligned to the ELA/ELD Framework. AB 2222 would undermine these efforts wasting valuable time and resources already dedicated to improving literacy for students.

Threatening a teacher training program with the removal of accreditation does not prioritize the well-being of students, the integrity of the education system, and the professional reputation of the institutions involved. Teacher training programs receive funding and support

that, if taken away, jeopardizes the program's ability to deliver high-quality education and support to its students. Instead of resorting to threats, it is generally more productive to address concerns about the quality of a teacher training program through constructive dialogue and collaboration. Accrediting agencies, educational institutions, and other stakeholders can work together to identify areas for improvement and implement strategies to enhance program quality and effectiveness. Threatening educator preparation programs with loss of accreditation does not incentivize the creativity needed to draw in new and needed talent during the current educator shortage.

3. Language Acquisition

CTA believes students in California have greater language diversity than in any other state or nation, and that our State must meet the challenge of ensuring equal access for these students. CTA recognizes that there are an ever-increasing number of languages spoken by California students, many of which are dissimilar to English and have no written materials. CTA believes all educators need to have in-depth understanding of language acquisition so that they can comprehend how strategies support students' language development during instruction of all academic areas. Furthermore, CTA believes it is important for all educators to understand how first language acquisition contributes to students second language acquisition. CTA believes English Learner (EL) students have specific learning needs. Instructional materials for EL students should consider all levels of language proficiency, and we firmly believe that instructional materials used for literacy development for ELs instructed in English should align to the ELA/ELD standards of the State of California.

California has a comprehensive approach to literacy instruction. The integration of oral and written language that emphasizes foundational skills as well as listening, speaking, writing, comprehension vocabulary development, and background knowledge is needed to develop literacy for our multilingual learners. This bill will exacerbate literacy disparities within multilingual communities. While EL students are mentioned in the bill, AB 2222 does not address their multifaceted needs in a comprehensive way. "Science of reading" as defined in the bill does not meet the needs of California's 1.1 million EL students, a group that comprises 20% of the student population. CTA believes all students are entitled to equal access to all educational opportunities.

Meeting the linguistic needs of EL students facilitates language development and enables them to access the curriculum more effectively, leading to improved academic outcomes. Recognizing and valuing the linguistic and cultural backgrounds of EL students fosters a more inclusive and culturally responsive learning environment. By incorporating students' diverse perspectives and experiences into the curriculum, educators can enhance engagement, motivation, and overall learning outcomes. AB 2222 is not culturally responsive and does not address the development of biliteracy. In an increasingly interconnected world, proficiency in multiple languages and cultural competencies are highly valued skills. Meeting the needs of EL students equips them with the linguistic and cultural proficiency necessary to thrive in diverse social, academic, and professional contexts. Overall, meeting the needs of EL students is not

only a matter of legal compliance but also a moral and educational imperative. By ensuring equitable access to quality education and providing the necessary support services, educators can empower EL students to reach their full potential and become successful, engaged learners who can acquire English proficiency while simultaneously learning academic content.

"Science of Reading," as defined in this bill, would force EL Learners to go through an incomplete program for reading instruction. Multilingual learners have distinct literacy needs, including bridging from their home language to English, vocabulary and comprehension development, and culturally relevant instruction; in choosing not to address these needs within AB 2222, the bill does not represent good policy for the State of California. To ensure that multilingual learner student needs are met, the SBE adopted the [English Learner Roadmap](#), intended to provide guidance to school districts on welcoming, understanding, and educating the diverse population of students who are EL attending California public schools. As a state, we seek to ensure meaningful access for EL students to participate in a 21st century education from early childhood through grade twelve that results in their attaining high levels of English proficiency, mastery of grade level standards, and opportunities to develop proficiency in multiple languages. Additionally, our school communities can access information on identifying, assessing, supporting, and reclassifying multilingual learners who may qualify for special education services via the [California Practitioners Guide for Educating English Learners with Disabilities](#).

4. Assessment and Testing

Just last year, Governor Newsom and the Legislature established a new requirement that all students in grades K-2 be screened annually for risk of reading difficulties. This new mandate, which will go into effect in 2025-26, will provide educators and their families with information about student literacy progress and needs. School districts will use screening results to provide intervention to students identified as needing support. AB 2222 would undermine efforts like this and divert attention from other efforts that are either still in progress or need to be funded to be implemented as intended, including:

- The 2023 Budget Act includes funding for a Literacy Roadmap, currently under development. This roadmap will explain how grounding our teaching in science for EL students, multilingual students, and students with challenges can be integrated in classroom strategies and throughout the school community in every grade level.
- Proposition 58 allowed schools to establish non-English-only education programs after requiring school districts to solicit parent and community input. This ballot initiative passed by a wide margin and authorized school districts to establish dual language immersion programs for both native and nonnative English speakers.
- Significant *state* funding regarding literacy instruction has included a \$3.7 billion commitment to expand access to universal pre-kindergarten for all four year olds by 2025-26 which involves literacy standards and assessments to support this expansion,

\$1.3 billion to enable teachers to enter the classroom fully prepared, \$500 million to train and hire literacy coaches and reading specialists for 800+ highest need schools, \$260 million to support early intervention for preschool-aged children, \$50 million to support 75 elementary schools through the Early Literacy Support Block Grant, \$28.7 million to the UCSF Dyslexia Center to create a screener in multiple languages that will detect early reading challenges, and \$25 million for the Literacy Coach and Reading Specialist Educator Training program. Other state investments in literacy include:

- Educator Workforce Investment grants to support educators of multilingual learner students and students with disabilities.
 - The California Reading and Literature Project.
 - The California Dyslexia Initiative.
 - Language Essentials for Teachers of Reading and Spelling.
 - CaliReads grant.
 - Reading Instruction and Intervention grants.
 - Reading and Literacy Authorization Incentive grants.
- Significant *federal* funding has been provided for a network of seven Literacy Lead Agencies for the Early Learning Literacy Project, The Getting Reading Rights Project, Uplift Literacy, Every Child Reads, The Far North Literacy Development Project, and the Lead to Literacy Project.

Restricting instructional methods stifles teachers' creativity and innovation in the classroom. Educators should have the flexibility to adapt their teaching strategies based on their students' needs, interests, and the content being taught. Allowing for a range of instructional approaches fosters creativity and encourages teachers to experiment with new methods to enhance learning. Teachers should have the autonomy to select instructional methods that best support the attainment of learning goals while considering the needs and preferences of their students. As trusted professionals, educators are best equipped to make school and classroom decisions to ensure student success. Limiting instructional approaches undermines teachers' professional autonomy and may impede their effectiveness in the classroom. When we identify helpful literacy research and best practices, the State of California should incentive this approach rather than resort to punishment, pulling accreditations, and tying the hands of teachers to think outside the box. We do not want to return to a dark time that sucked the joy out of teaching with scripted learning and poor implementation due to confusing and poorly defined definitions for reading instruction. The limiting nature of the "one-size-fits-all" language of the bill will not allow educators to differentiate, support special education students, and meet the diverse needs of California's English learners. ***For these reasons, we respectfully request your "NO" vote when AB 2222 (Rubio) is heard in the Assembly Education Committee.***

Sincerely,



Seth Bramble
Legislative Advocate

CC: The Honorable Members of the Assembly Education Committee
The Honorable Blanca Rubio

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