



Re: Docket No. ED-2015-OESE-0130

Implementing Programs under the Elementary and Secondary Education Act

Decoding Dyslexia Maryland represents families, students, teachers, college professors, university researchers, tutors, dyslexia schools and other related professionals, concerned about limited access to dyslexia interventions and training for educators in our schools. Decoding Dyslexia represents more than 500 families with active advocates in every school district in Maryland.

General Advice and Suggestions:

--Full funding for all ESSA provisions as noted in the legislation.

--Subgroups continue to be disaggregated so that poor performance cannot be hidden and schools and districts know which students need help.

--Identification of, and targeted, evidence-based intervention and support in schools in which any subgroup of students consistently underperforms. We suggest that evidence-based interventions section include examples. What Works Clearinghouse and AIR rate program effectiveness based on the definition of "evidence-based" but yet there are many programs that show limited efficacy for students with dyslexia – this should not happen.

--Although many programs may be effective with struggling readers, often they are not proven effective for students with disabilities including dyslexia. There are many examples we can cite, but will reserve naming programs and examples at this time.

--Models of effective programs should be open-sourced so that others can replicate them easily.

--Determination of Student Growth: SEAs and LEAs should not use this section to mask reading difficulties and gaps.

--Regulations should stipulate examples of real and meaningful progress and provide best practices that demonstrate how an SEA/LEA should measure progress toward grade level reading and writing. A data point that shows some progress with reading fluency using measures of "hot and cold" reads is not an accurate progress measurement. Measurements that show one year-plus progress toward goals are also needed (FAPE Guidance, November 2015).

--We recommend that the DOE promulgate regulations detailing best practices to teach the foundations of reading that contain the characteristics of effective reading instruction for students with learning disabilities (www.literacyhow.com). Teachers report that they need to know more about effective instruction. A model of teacher instruction is the Knowledge and Practice Standards for Teachers of Reading <http://eida.org/knowledge-and-practices/>

--Define specific learning disabilities in the regulations so that it is clearly understood by all parties. In Maryland, 93% of students with disabilities scored below proficient on the 4th grade NAEP reading assessment. The number of students scoring below proficient

(at the Basic level) has not changed significantly in twenty years. It's time to change that paradigm.

--In particular, funding and the development of the Comprehensive Literacy Centers for Technical Assistance and National Evaluation are important to Decoding Dyslexia Maryland.

We want to ensure that:

--State Education Agencies clearly understand the opportunity to procure grant funding, training and best practices on dyslexia.

--We want to ensure there is good communication between the Literacy Centers and the State Education Agencies and parents.

--SEAs and LEAs follow the Dyslexia Guidance issued in October 2015. Many LEAs continue to refuse to say dyslexia or include it as a factor in evaluations and IEP processes.

--We are working with our State Education Agency to implement the guidance and want to continue to ensure that Maryland educates LEAs about the dyslexia guidance.

--If SEAs/LEAs don't "say dyslexia" we are concerned that they will not take advantage of the Literacy Center's resources to the detriment of students with disabilities who struggle with reading and dyslexia.

Decoding Dyslexia Maryland members will participate in negotiated rulemaking in whatever capacity necessary.

Thank you for soliciting community input and we look forward to working with you.

www.decodingdyslexiamd.weebly.com