California Association for Bilingual Education

March 11, 2024

The Honorable Assembly Member Mike Fong, Chair
Assembly Higher Education Committee
1020 N Street, Room 173
Sacramento, CA 95814

**Re: AB 2222 (Rubio)**
**Position: Oppose**

Dear Assembly Member Fong:

We are writing to inform you of California Association for Bilingual Education's (CABE) respectful opposition to AB 2222 (Rubio) as introduced on February 7, 2024, which creates a statewide framework for all reading instruction to adhere to the science of reading (SOR).

California currently enrolls 1.1 million English learner (EL) students in TK-12. Across the State, 60% of young children have a home language other than English. While California has provided some support to enhance the services provided to support these students, it has yet to mandate implementation of the English Learner Roadmap, to ensure all local educational agencies (LEAs) are trained to provide the necessary support to help ELs garner the support they need to succeed. CABE believes this systemic gap is one of the fundamental reasons why California has yet to see vast improvements for this growing student population.

Like you, CABE strongly believes that California needs to improve the reading and literacy development of all students, including ELs. Unfortunately, CABE does not believe that mandating a single option for literacy instruction through the SOR will address the needs of ELs, particularly as most districts across the state have not yet implemented the English Learner Roadmap.

**Reading Achievement Test Scores**

CABE believes AB 2222 (Rubio) is based on a misreading of reading achievement test scores and does not specify how the SOR-aligned instruction and materials would remedy the causes of low achievement in reading. In fact, standardized test scores cannot be used for that purpose. They cannot identify causes of score variability among student subgroups, particularly EL students.

The description of students who are not reading on grade level by third grade identifies lower levels of achievement based on students' demographic characteristics. AB 2222 (Rubio) states that …" [T]he vast majority of children falling behind are economically disadvantaged" low-income families, children who are Black and Latino, and English learners." From an empirical research vantage point, these statistics do not indicate that

poor literacy instruction is a causal factor in these students' reading achievement. Therefore, these data do not support an argument that instruction aligned with the Science of Reading is a remedy to low levels of reading achievement.

In particular, ELs are not expected to be reading on grade level by third grade because of the predictable rates of acquiring English language proficiency. On-grade-level reading achievement is dependent on a student having attained a near-native level of English proficiency. AB 2222 (Rubio) does not consider factors that are unique to California's ELs.

**SOR Research on Multilingual Learners' Language and Literacy Development**

The assumptions created in AB 2222 (Rubio) are contradictory and inconsistent with the actual research behind the SOR and the interdisciplinary research on multilingual learners' language and literacy development that informs "evidence-based literacy instruction."

Section 10, which adds Section 60011 defines evidence-based literacy instruction, identifies phonics, vocabulary, and comprehension as areas that require "explicit and systematic instruction." However, on p. 20 (5), lines 12-17, it claims that "an interdisciplinary body of scientifically based research *"…" [D]oes not rely on any model for teaching word reading based on meaning, structure and syntax, and visual cues.*" This statement is contrary to the body of research referred to as the SOR, as well as contradicting the "scientifically based" research on how children learn to read and write, including the more recent research through the neurosciences.

The alphabet itself is a system of visual cues made up of 26 letters that represent the sounds of speech. The purpose of the alphabet is to convey meaning through the decoding of print. The purpose of "word reading" is for the reader to determine the meaning of words (vocabulary) based on the alphabetic visual cues in order to comprehend the text. Research shows that 16% to 20% of words in English cannot be accurately decoded without reference to the word's syntax. (Bowers & Bowers, 2017) So, if the SOR does not rely on teaching words' meanings through visual cues and their structure and syntax (grammar), how does the SOR define reading?

**Oral Language Development**

CABE respectfully disagrees with the narrow view taken by the SOR in its belief for how children "come to know" and develop oral language as well as how they learn to read and write, particularly for ELs and emergent bilingual learners.

Page 19, Section 10. Section 60011. (a) (1) states…" Evidence-based literacy instruction" means evidence-based explicit and systematic instruction in phonological and phonemic awareness, phonics, vocabulary and oral language development, fluency, comprehension and writing that can be differentiated to meet the needs of

individual pupils and that adheres to the science of reading. For limited-English-proficient pupils, this shall include instruction for English language development as defined in subdivision (a) of Section 44253.2.

Bowers (2020) conducted a critical meta-analysis of 12 research studies supporting systematic phonics instruction. His findings are stated in the following: “Despite the widespread support of systematic phonics within the research literature, there is little or no evidence that this approach is more effective than many of the most common alternative methods used in school…This does not mean that learning grapheme-phoneme correspondences is unimportant, but it does mean that there is little to no empirical evidence that systematic phonics leads to better reading outcomes,” (p. 703).

CABE believes that by focusing on training and the utilization of solely the SOR in California’s schools will not be the most effective model for ELs. Since this population represents one-fifth of all students, we believe it is not worth risking such a large and important student population on a system that cannot meet the needs of these students.

**Mandatory SOR Professional Development**

CABE is opposed to both mandating and restricting professional development and training programs for teachers to solely the SOR at the exclusion of other viable professional development possibilities related to language learning. No single professional development approach/program covers all the language development (oral/written in first and second languages) knowledge that teachers need to teach effectively.

Page 14, Section 8, adds Chapter 3.5: Professional Development for the Science of Reading, commencing with Section 44755, (a) "It is the intent of the Legislature that each teacher, and those who supervise or coach teachers, of pupils enrolled in transitional kindergarten, kindergarten, or any of grades 1 to 5, inclusive, possess the knowledge, skills, and abilities to effectively teach pupils to read.” It is the expectation that local educational agencies provide ongoing professional development in evidence-based literacy instruction that adheres to the science of reading, including the unique needs and assets of English Learners.”

AB 2222 (Rubio) makes the incorrect assumption that providing the SOR as professional development will address reading and literacy. For example, on January 5, 2023, in an article titled, “A timely Reminder: There Are No Silver Bullets, Even With Professional Development,” Rivet Education states that “In recent weeks, social media buzz saw lots of conversation about outcomes from Lexia Language Essentials for Teachers of Reading and Spelling Suite (LETRS) training. Some seemed surprised to learn that an Institute of Education Sciences study found that this training had improved teacher knowledge but did not improve student outcomes. ‘Food for thought,’ tweeted professor of literacy education at Kent State University and director of its award winning

clinic, Tim Rasinski, highlighting that many states have made LETRS training the heart of their 'Science of Reading' investment strategies."

**SOR is Not More Successful Than Other Programs**

Should California consider a massive one-size-fits-all mandate for the State, potentially at the cost of hundreds of millions of dollars, without clear and concise evidence that solely one program will address every student need in every community across the state, including for ELs? Unfortunately, there is no evidence that SOR materials or programs are more successful than other types of reading materials and programs, especially for ELs and emergent bilingual learners. Mandating materials and programs that only adhere to SOR criteria will create a monopoly of a select group of vendors and profiteers, at the cost of California's EL student success.

Decodable books, a recommended SOR material does not have any research to support their use in beginning reading. Allington, (2005) in his article, "Ideology Is Still Trumping Evidence," stated "But the National Reading Panel did not recommend such texts. It found, 'Surprisingly, very little research has attempted to determine whether the use of decodable books in systematic phonics programs has any influence on the progress that some or all children make in learning to read.' "Basically, no studies existed in which decodable texts had been isolated as a variable to estimate their impact on reading acquisition. None." (p. 465)

**Teacher Preparation Accreditation**

CABE opposes changing the existing teacher preparation accreditation process by mandating solely SOR curriculum. There is no scientific evidence to justify this mandate of science of reading curriculum across teacher preparation programs statewide.

California's current teacher preparation accreditation process and its literacy standards on program quality and effectiveness, literacy teaching performance expectations, and literacy instruction preconditions are already aligned and include all the elements (Meaning Making, Content Knowledge, Language Development, Foundational Skills and Effective Expression) of the Effective California Comprehensive English Language Arts/ELD Framework.

Likewise, adhering to SOR exclusively trumps and goes against the tremendous and arduous work that was put in by California educators and expert scholars that were/are involved in putting together the English Language Arts/English Language Development Framework and includes a plethora of evidenced based instructional practices.

Further, in "The Future of the Science of Reading," Rachael Gabriel (2020) states that "the future science of reading cannot be limited to a single perspective drawn from the findings of the largely white, Western view of neurology, development, and pedagogy. It cannot be limited to discrete levels of language (orthography, phonology and semantics)

without accounting for the reciprocal relations between other dimensions of language-in-use: discourse, pragmatics, rhetoric, and the culture it maintains and conveys." (p. 18).

Why would California, who has been working to be a national leader recognizing its linguistic diversity go backwards and legislate and mandate a narrow and limiting teacher preparation curriculum in language and literacy, particularly when our student population is becoming even more ethnically and linguistically diverse?

While CABE supports improving reading and literacy outcomes for California's students, we believe it should not be at the cost of one-fifth of our student population. California must ensure current and future ELs have a reading literacy program that is culturally competent and linguistically appropriate to meet their needs.

CABE respectfully urges your "NO" vote on AB 2222 (Rubio) when it is heard by the Assembly Higher Education Committee. Should you have any questions regarding our requests, feel free to reach out to CABE's Legislative Advocate Jennifer Baker at jbaker@m-w-h.com.

Sincerely,

Dr. Edgar Lampkin
CABE Chief Executive Officer

Jennifer Baker
CABE Legislative Advocate

Footnotes:

1. Bowers JS (2020). Reconsidering the evidence that systematic phonics is more effective than alternative methods of reading instruction. Educational Psychology Review. https://link.springer.com/article/10.1007/s10648-019-09515-y - DOI

2. Allington, Richard. (2005). Ideology is Still Trumping Evidence. Phi Delta Kappan. 86. 462-468. 10.1177/003172170508600611.

3. Bowers, J.S., & Bowers, P.N. (2017). Beyond phonics: The case for teaching children the logic of the English spelling system. Educational Psychologist, 52(2), 124-141. https://doi.org/_10.1080/00461520.2017.1288571[doi.org.]

cc: The Honorable Assembly Member Blanca Rubio
Members, Assembly Higher Education Committee
Jeanice Warden, Consultant, Assembly Higher Education Committee
Lyndsay Mitchell, Consultant, Assembly Republican Caucus