



January 19, 2021

Dear Sharon, Judy, Kathie and Ann,

The Palo Alto CAC strives to work cooperatively with PAUSD staff in support of students with, and at risk for Dyslexia. Since the 2017 release of the state's Dyslexia Guidelines, concrete supports and directives from the CDE have noticeably lagged, putting districts like ours in a predicament to develop our own expertise and roadmap. This is further complicated by a long-standing debate over entrenched "pedagogy" that has raged on nearly 25 years ([1997 National Reading Panel](#)). Unfortunately evidence shows that ELA outcomes in PAUSD continue to be disproportionate and inequitable for students with dyslexia, and for racial minorities. Our sincerest hope is that irrespective of these hurdles, PAUSD will chart a successful path forward with the leadership and support of our School Board and Superintendent.

There is no doubt about educators' sincerity in aspiring to have all PAUSD students reading by 4th grade. It's a grand and necessary target, and certainly what everyone wants to accomplish. But, **what we struggle with is HOW to equip teachers and their students who struggle to read**. Our hope is that with an honest and mutual acknowledgement of the hurdles and challenges, consensus goals, and realistic timeframes, PAUSD will achieve what has eluded so many.

Your [January 19th Presentation](#) on Dyslexia lists 4 elements for addressing struggling readers and students with dyslexia: Assessment, Monitoring, Tiered Instructional Support, and Professional Development. This is a great start towards a comprehensive PK-12 system. For what is underway, we see genuine progress towards the Goal: "The district is committed to early identification and early intervention for students who have Dyslexia or any barrier to reading fluently and with comprehension". We applaud your incorporation of additional Secondary supports and strategies and really appreciate our open dialog thus far. Thank you for that. What follows is an offering of some comments and questions about materials that have been provided thus far.

Assessment: Universal Screening and Identification of Dyslexia

We are pleased that "The administration of the Shaywitz DyslexiaScreen in grades 1-3 will take place in the second trimester." However, the Dyslexia Guidelines recommend universal screening as early as Kindergarten, and we concur. Additionally, UPAR in the High Schools is not a screener but an ["evaluation tool"](#), [which] analyzes students' reading capacity to determine what methods work best for each student". Please specify if there is a universal screener for Secondary and reconsider screening in Kindergarten. We also recommend acknowledging in documentation *"that a parent may request an initial evaluation at any time to determine if a child is a child with a disability under IDEA, and the use of MTSS, such as RTI, may not be used to delay or deny a full and individual evaluation of a child suspected of having a disability"* ([US Dept. of Education's 2015 Dear Colleague's Letter](#)). Where and how will you specify the criteria for Special Education eligibility? For 504 eligibility?

Monitoring: Developing a 1-12 System

We are pleased to see attention across the age spectrum with flowcharts for [Elementary Identification Process](#) and [Secondary Intervention Decision Tree](#). But we want to voice concern over any delays in identification or effective instruction for students with Dyslexia. Can you clarify what data is being collected, and the duration and frequency of monitoring cycles before “minimal progress” is determined? In other words, what data will routinely be used and shared for decision-making? Will you develop a dashboard of sorts?

Tiered Instructional Support: Tier 1 Instructional Strategies

We are pleased to see the growing capacity of PAUSD’s Tier 2 and Tier 3 Instructional Strategies. However, as recent as December, the state's Draft Comprehensive Literacy Plan (attached) was criticized by DDCA (Decoding Dyslexia CA) for failing to “adequately address the critical importance of foundational reading skills and perpetuates a top-down model that emphasizes meaning making without acknowledging that literacy is dependent upon the primary acquisition of foundational skills.” This is a decades-long debate that is not serving our most vulnerable students, and dovetails with our disproportionality citations in SLD. Therefore, we question the repeated reference to “multisensory strategies”, which is only one of the characteristics of a robust “structured literacy” approach that students with Dyslexia need to become readers. *California Education Code Section 56335(a) defines educational services for students with dyslexia as follows: “educational services’ means an evidence-based, multisensory, direct, explicit, structured, and sequential approach to instructing pupils who have dyslexia.” In addition, effective intervention for students with dyslexia should include instruction in phonemic awareness, phonics, vocabulary development, fluency, and comprehension. This type of instruction is called “Structured Literacy.”* In our Dyslexia strategy, why isn’t there explicit mention of “structured literacy”?

Professional Development:

The processes and decisions associated with serving students with disabilities are complex and at times confusing to parents and school staff. We encourage development of a Dyslexia Handbook for all staff and parents, which was a feature of PAUSD’s [2018 Guidelines Implementation Plan](#). Additionally, because the experiences of a different learner is challenging and times frustrating, and because students are gifted with a wide range of abilities and interests, we recommend PAUSD develop a solid, strengths-based approach to teaching and learning which is critical for neurodiverse students' near-term and long-term growth, grit, wellness, and contribution.

Finally, although Santa Clara County was not awarded the state CDI Grant, we are fortunate to have a Board that has budgeted and supported for this effort, and we believe PAUSD can still lead in implementation of the Dyslexia Guidelines, and most importantly setting the foundation for our students to access learning. Thank you for your time and devotion to our kids, we look forward to partnering.

Respectfully,

Kimberly

on behalf of kids with learning differences and those struggling to read

Attachments:

Board Presentation:

<https://drive.google.com/file/d/170vC5qWdK4i1Em8N0jqNhkMu3l8AsTRg/view?usp=sharing>

Board Report:

<https://drive.google.com/file/d/1pbuRXb8ZSGRs96l8KH52jAGCNukNLoFh/view?usp=sharing>