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Upper Midwest Branch

May 12, 2009

Administrative Law Judge Barbara L. Neilson
Office of Administrative Hearings
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164

RE: Proposed Amendment to Rules 8710.3200 Teachers of Elementary Education

Dear Judge Neilson:

Thank you for this opportunity to participate in this critical process for improving teacher standards. The International Dyslexia Association (IDA) is a nonprofit, scientific and educational organization dedicated to the study and treatment of dyslexia and related language-based difficulties. As members of the Board of the Upper Midwest Branch of the International Dyslexia Association we support our state's initiatives to provide effective reading instruction to all children, and we support the changes proposed by the Board of Teaching to **M.R. 8710.3200, Subp.3, specifically Sections (A) through (F)**. Over the years, we have worked with many very talented, knowledgeable and tireless parents who have out of necessity sought out the research-based practices and outcome-centered problem-solving to help their struggling children learn to read. All too frequently, they've found successful research-based instruction outside of the schools, not for want of caring or effort from teachers, but because of a gap in many teachers' knowledge of effective reading instruction.

We believe that the importance of teaching all children to read cannot be overstated. It is undisputed that reading proficiency is the very foundation for providing our students with the opportunity to meet the challenging academic standards we have established in our state for all children. Gaps in reading skills result in academic difficulties that can smother the enthusiasm for learning that children have when they enter school. Without required reading skills, the chances for academic and occupational success are unfairly and unnecessarily limited.

The National Institute of Health's NICHD epidemiological longitudinal studies indicate that 1 child in 5 will experience significant difficulties learning to read well enough to utilize reading for learning and for enjoyment. We know that about 90 percent of struggling readers are at risk for becoming instructional casualties if not provided with explicit and systematic instruction in the complex array of skills required for reading. Research shows that early intervention programs that combine instruction in the essential components of reading (phoneme awareness, phonics, spelling, reading fluency, and reading comprehension strategies) provided by well-trained teachers can increase the achievement of at-risk students to average reading levels. While older children and adults can be taught to read, the time and expense of doing so increases several times compared to the cost of effective instruction in early years.

Current student outcomes clearly indicate a need for change; it is not only reasonable, but imperative to hold all teacher candidates and currently licensed teachers to high expectations for their knowledge of the science of reading and reading instruction. Therefore, we strongly support proposed changes to the rules for K-6 teacher standards specific to the instruction of reading in **8710.3200**, particularly Subp.3, Sections (A) through (F), requiring teacher preparation program reforms to include specific coursework in research-based reading instruction with greater consistency across the state. This will undoubtedly provide elementary teachers with effective tools and working knowledge of reading instruction as described in the No Child Left Behind Act and the National Reading Panel Report (NIH, 2000) which compiled research findings collected over 33 years and involving more than 34,000 students and adults.

These changes to M.R. 8710.3200 are needed to ensure that all of our teachers understand that successful comprehension among good readers involves decoding letters to sound in an increasingly complete and accurate manner, which requires robust development of phonemic and phonics skills as well as vocabulary and background knowledge. Closing the persistent reading achievement gaps in Minnesota requires that all children be educated by teachers who meet rigorous professional standards and share a common language specific to the teaching of reading. Even our first year teachers should understand that effective instruction doesn't come from a single program or method, but from carefully integrating various research-based methods and materials, so that they can recognize when and where to seek appropriate assistance to effect desired outcomes.

Thank you for considering these comments on behalf of our Board members. We are confident that these proposed changes to teacher standards will provide a foundation for positive outcomes and success for all children.

Sincerely,



C. Wilson Anderson, Jr.
President
IDA-UMB

Maria Lindstrom

From: Susan Kuseske [susan_kuseske@isd743.k12.mn.us]

Sent: Thursday, May 14, 2009 4:17 PM

To: rulecomments@state.mn.us

In regards to the increased requirements for reading strategies and rule # 8710,4525 (Technology licensure):

As a teacher, we are constantly be required to add extras to our licensure without a full understanding of why these are needed. I'm the first to say we need to keep improving ourselves professionally but as a person who has other things going on in my life, I feel extremely pressured to conform to something that in many respects hasn't been shown to improve students ability to do school work or more importantly to become a person in our society that are **capable of doing the needed basic life skills to succeed and be a contributing member of said society**. If this rule is so important, then it is in the best interests of our students for the person(s) to spend a full year in the school system teaching our young people. **Then propose the changes based upon true observation and involvement in the classroom.**

I have observed many teachers in various disciplines that are working hard to help and provide learning strategies to all students in all areas of their education. Sometimes I know that there are mandates put in place that don't truly benefit anyone except the ones who authored the mandates.

I do not agree with the rule #8710.4525. We have capable people now to do this area in our school and to add a dimension that appears to be a Band-Aid approach is wrong. The first question I would ask is "Who does this ultimately benefit?" Secondly, "Is this a way for anyone to help be guaranteed a job?" I also feel that if a person is capable of teaching K-12 they are one fantastic person. Because anyone who has worked with children knows that there is a tremendous amount of change that takes place between Kindergarten years and Seniors in High School.

My final thought is "Are you setting up education for a Failure? Because it appears that we are in jeopardy of losing very talented and capable people to be a part of our future education workforce.

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