



**The Education Trust–West**

Fierce advocates for  
educational justice,  
pre-k through college.

March 29, 2024

The Honorable Al Muratsuchi  
Chair, Assembly Education Committee  
1020 N Street, Room 159  
Sacramento, California 95814

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

**RE: SUPPORT IF AMENDED, AB  
2222 (Rubio)**

Dear Chair Muratsuchi and Chair Fong,

As an organization committed to advancing policies and practices that dismantle the racial and economic barriers embedded in California’s education system, EdTrust–West (ETW) is writing with a SUPPORT IF AMENDED position on AB 2222, while also elevating possible amendments or recommendations that can strengthen the implementation of changes to literacy instruction proposed in the bill.

The status quo of reading instruction is ineffective and inequitable, leaving behind someone of our most vulnerable students in the state. Third grade is when students go from learning to read to reading to learn, making this a pivotal point for a child’s educational journey. Yet, in 2023, only 43 percent of 3rd graders in California met grade-level English Language Arts (ELA) standards. The data is even more alarming when you disaggregate it by race and economic status. In that same grade-level, only 27 percent of Black students and 32 percent of Latinx students met grade-level standards in ELA, compared to 57 percent of white students. Similarly, only 31 percent of low-income students were proficient compared to 63 percent of non-low-income students (California Department of Education, California Assessment of Student Performance and Progress data, 2023). The data is also glaring for English learners: in 2022-23, fewer than half of all English Learners were supported to progress toward English proficiency, two key components of which are reading and writing in English (California School Dashboard, 2023). The data reflects the painful challenges students are facing in schools.

Unfortunately, our teacher preparation programs are also failing to adequately prepare the next generation of teachers. An evaluation conducted by the National Council on Teacher Quality shows that only 2 out of 41 programs evaluated in California earned an A for preparing aspiring teachers in effective methods of teaching reading. This means that only 2 programs adequately teach all five core components of reading (phonemic awareness, phonics, fluency, vocabulary, and comprehension) and provide little to no instruction on content contrary to research-based practices. We know that having a well-prepared educator workforce is crucial for student learning and student

experience. Fully qualified and prepared teachers overwhelmingly make the greatest impact on students, especially with students of colors and those experiencing poverty. While there are many methods of improving teacher quality, there should be an emphasis to align and reinforce expectations of educators while they are in their credentialing programs. When educators feel the direct impact of their learning in the field, they are more likely to stay in the profession, serve as a mentor teacher to other educators, and more effectively engage with students, further improving their outcomes.

While we are encouraged to see AB 2222 accelerate momentum toward evidence-based solutions, a transformation to this scale must be implemented with fidelity to avoid unintended consequences. We are concerned that without oversight of the implementation and more attention to the unique needs of English Learners in the process, there will be unintended consequences such as misinterpretation of science of reading leading to a narrowed focus on foundational skills and further barriers to bringing in more teachers to the workforce if literacy programs lose accreditation. In light of those concerns and to minimize the possible negative impacts of implementation, we are requesting the following amendments to AB 2222:

1. Revise the definition of the Science of Reading to include the components of the English Language Arts (ELA) & English Language Development standards and framework and multiliteracy, as outlined in the English Learner Roadmap. This signals the importance of supporting and including the unique needs and assets of English Learners [Section 60011].
2. Remove language that may be restrictive and cause unintentional consequences for teacher preparation programs and local education agencies [Section 44372 (j)(2)], [Section 44374 (g)], and [Section 60210 (c) (3-5), (B), (C)(i)].
3. Require the State Board of Education to establish a reading and multiliteracy implementation and oversight committee (committee) to serve as the primary entity charged with advising, coordinating, and overseeing the implementation of evidence-based literacy reforms that are:
  - a. Based on research on the science of reading, English language development, and multiliteracy; and proven effective for students from low-income households, students of color, multilingual students, and other historically marginalized student groups to improve literacy, including multiliteracy, and learning outcomes for students.
  - b. The Committee shall provide advice, guidance, and recommendations for 1) educator preparation; 2) educator professional learning, and 3) instructional materials. By December 2025, the committee shall make their recommendations known to the entities charged with implementation. The committee shall prioritize reforms that have state funding and align with current statewide initiatives and investments in literacy, including the English Learner Roadmap, Literacy Roadmap, updates to the Teacher Performance Expectations (TPEs) on literacy, Global 2030, Educator Workforce Investment Grant (EWIG) funding, and other funding to support high-needs schools with hiring and training literacy coaches. The committee will recommend accountability measures aligned with the oversight and accountability systems within each area including, but not limited to, accreditation regulations for educator preparation programs, California's local control and accountability system, and the State Board of Education's process for approving instructional materials.
  - c. To enhance coordination and communication among agencies and stakeholders, be inclusive and responsive of the needs and literacy outcomes of all students, and to be representative of the various stakeholders in the state and draw upon a diversity of expertise, the committee is required to include at least one representative with the following areas of expertise:
    - i. English Learners and English language development
    - ii. Black child development
    - iii. Black student education
    - iv. Early literacy, that includes dual language learners
    - v. bilingual education
    - vi. culturally responsive curriculum and pedagogy

- vii. students with disabilities
- viii. non-profit focusing on family engagement
- ix. educator preparation programs
- x. science of reading
- xi. State Department of Education, Multilingual Support Division
- xii. State Department of Education, Early Education Division
- xiii. California Department of Education, Curriculum Frameworks and Instructional Resources Division
- xiv. California Department of Education, Professional Learning Division
- xv. State Board of Education
- xvi. Commission on Teacher Credentialing

Given the magnitude of the comprehensive reform for literacy set forth in this bill, we highly recommend requiring an impact study that will allow us to understand the impact and efficacy of these reforms following implementation.

These amendments will help ensure that implementation prioritizes a unified effort by various stakeholders to address the literacy crisis, that multilingual learners are centered in a way that supports their unique needs and linguistic gifts, and that no unintentional consequences negatively impact our educator workforce that is currently impacted by a shortage.

We owe it to our students to follow the data and work together to find policy solutions rooted in evidence. The state is already taking steps in the right direction with updates to our Teacher Performance Expectations on literacy, investments in literacy coaches, and a California Literacy Roadmap. We hope to continue seeing thoughtful policy solutions that can lay the foundation for a meaningful transformation in the state's approach to teaching all kids to read.

We thank you for your consideration of our concerns and ask that you adopt these amendments to AB 2222.

Sincerely,



Brian Rivas  
Senior Director of Policy and Government Relations

cc: Assembly Member Blanca Rubio  
Members of the Assembly Education Committee  
Members of the Assembly Higher Education Committee  
Tanya Lieberman, Chief Consultant, Assembly Education Committee  
Jeanice Warden, Chief Consultant, Assembly Higher Education Committee