Thank you Senator Haskell, Representative Elliott, Senator Witkos, Representative Haines and members of the Higher Education and Employment Advancement Committee. My name is Charlene Russell-Tucker and I am a Deputy Commissioner with the State Department of Education. Bryan Klimkiewicz our Division Director for Special Education served as the Commissioner’s designee on the Dyslexia Taskforce and we appreciate having the opportunity to submit written testimony regarding HB 6517, An Act Implementing The Recommendations Of The Task Force To Analyze The Implementation Of Laws Governing Dyslexia Instruction And Training. While we are extremely dedicated to improving the delivery of services to students with print-based disabilities, the Department cannot support the majority of this proposal. Our objections to the provisions outlined below were made known throughout the course of the Taskforce’s work.

Section 1 – The Department cannot support many of the provisions in this section largely due to lack of resources. Some provisions are also outside of our areas of expertise. All new program approvals are already required to meet current statutory/regulatory requirements prior to State Board of Education (SBE) approval. However, the Department does not have the capacity to audit each individual Educator Preparation Program (EPP) provider, nor the depth of internal expertise, to audit individual course syllabi to the level of specificity required by the bill.

Sections 2&3 – Connecticut (CT) participates in the National Association of State Directors of Teacher Education and Certification (NASDTEC) Interstate Agreement to facilitate interstate flexibility and reciprocity. This agreement waives all course requirements if the candidate completes a state approved EPP in another state. As such, the additional requirement of 12 clock hours as outlined in this section will create barriers of entry to educators who served outside of CT looking to obtain a CT certification. The Department will no longer be able to apply existing pathways for educators who hold endorsements identified within the proposed legislation (remedial reading, remedial language arts, reading consultant, comprehensive special education or integrated early childhood).

Section 4 – The Department does not have the capacity to collect and evaluate training materials from all local education agencies (LEAs). This will also be an added burden for districts, that would be required to submit all in-house training materials to the Department for our review and evaluation.

Section 5 – While the addition of ‘student teaching’ helps for those educators who will be pursuing their initial educator license; the language will prevent the Department from allowing currently certified educators with said endorsements, who hold an initial or provisional license, to advance their license to the next level unless the EPP program they completed at time of certification met the proposed bill requirements (which were not yet in place). As we have testified to in the past, this requirement poses extreme challenges/burdens for currently certified educators, who are employed in critical designated shortage areas, to complete a supervised practicum/student teaching experience to advance their certificate. While the addition of student teaching provides extra flexibility for initial candidates, it does not resolve the issue for currently practicing candidates.
Section 6 – The Department does not authorize university or practicum supervisors; this is done at the EPP level. The requirements of this bill will significantly limit the number of individuals who will be considered qualified to serve as university supervisors; creating additional barriers of entry to the profession as potential candidates will outpace qualified supervisors.

Section 7 - However well-intentioned, the Department cannot support all elements of this section with current staff capacity and budget constraints. Additionally, the Department believes that it is important to maintain the five essential components of reading; phonics, phonemic awareness, fluency, vocabulary, and comprehension as the foundation for our universal screening reading assessments. The additional suggested assessments should be administered as a second tier and included as components of a more comprehensive evaluation for at risk students whose universal data was of concern. Requiring the additional assessments for all students would pose an unnecessary burden on our educators and students. Without additional resources, our Academic Office currently does not have the staff to re-develop and approve new reading assessments, develop or approve a family questionnaire, or provide individualized support and assistance to each board of education regarding goals, student body characteristics, resources, analysis of data. When first legislated in 2016, the Department conducted this work and it took a significant amount of staff time and resources that we do not currently still have.

The Department’s opposition to much of this bill should not be taken as an indication of anything contrary to our steadfast commitment to improving educational outcomes for students with print-based disabilities including dyslexia. We recognize and applaud the tremendous efforts of the task force to address teacher preparation, key components of universal reading screenings, appropriate and accurate identification of students, and effective intervention strategies. The Department will continue to support our school districts and families with technical assistance, professional development, and structures to drive continuous improvement activities in our schools. Should any member of the Committee wish to discuss this, or any other proposal before the Committee effecting the Department of Education, please reach out to our Legislative Liaison.