

Advocates for Literacy

December 19, 2018

Stephanie Valentine
Acting Director, Information Collection Clearance Division
Office of the Chief Privacy Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Re: Docket #ED–2018–ICCD–0092; Comprehensive Literacy Program Evaluation: Striving Readers Implementation Study

Dear Acting Director Valentine,

On behalf of Advocates for Literacy, a coalition of **nearly 60** organizations focused on increasing the federal commitment to improve comprehensive (birth through grade 12) literacy instruction through evidence-based practices, thank you for the opportunity to provide the U.S. Department of Education (ED) comments on the proposed information collection request (ICR) for the Striving Readers Implementation Study. We are pleased to submit the following comments in support of the Comprehensive Literacy Program Evaluation:

Advocates for Literacy believes the information collection regarding the Striving Readers Comprehensive Literacy (SRCL) program is necessary to the proper functions of ED and that information from this collection will be processed and used in a timely manner.

In the fall of 2017, grants from the Striving Readers Comprehensive Literacy (SRCL) program were awarded to 11 states, the Bureau of Indian Education, and four territories. It is essential that ED evaluate the implementation of this program to provide educators, administrators, and policymakers with feedback on best practices found across the program. This information will also facilitate the transition from SRCL to the Literacy Education for All, Results for the Nation (LEARN) program included in Title II, Part B of the Every Student Succeeds Act (ESSA). Moreover, information from this data collection will be used by advocates and policymakers when making decisions regarding funding for future comprehensive literacy development grants.

Advocates for Literacy offers the following recommendations regarding how ED may enhance the quality, utility, and clarity of the information to be collected:

- Align the information collection regarding the SRCL program with the evaluation requirements of the LEARN program described in section 2225 of ESSA. In the forthcoming evaluation of the SRCL program, include a description of such alignment – including where information is aligned and where information is not aligned – to ease transition between the programs.
- Include survey questions during the information collection that address how information about the program is being communicated to educators and administrators and what the overall vision of the state is regarding their literacy plan. Suggested questions could include:

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- *For educators and administrators:* Have you heard of the Striving Readers program? What resources have you been provided with from the Striving Readers program?
- *For state-level grantees and district administrators:* What are the goals of the State comprehensive literacy plan? How is the State planning to achieve these goals?

Research demonstrates that a high-quality, literacy-rich environment beginning in early childhood is one of the most important factors in determining school readiness and success, high school graduation, college access and success, and workforce readiness. Yet, only 35 percent of fourth-graders and 35 percent of eighth-grade students performed at or above the proficient level in the 2017 Reading assessment of the National Assessment of Educational Progress (NAEP) – the Nation’s Report Card.ⁱ Of the more than 500,000 students who leave U.S. high schools each year without a diploma, many have low literacy skills.ⁱⁱ Information collected through the Comprehensive Literacy Program Evaluation of the SRCL program is critical to continuing to expand the body of research on best practices for improved literacy instruction.

Thank you for your consideration and the opportunity to provide comments on the Striving Readers Implementation Study. We look forward to working with ED on the successful implementation of SRCL and LEARN. Please do not hesitate to reach out to Rachel Bird Niebling at the Alliance for Excellent Education (rneibling@all4ed.org) or Amanda Karhuse at the National Association of Secondary School Principals (karhusea@nassp.org) with any questions.

Sincerely,

Academic Language Therapy Association
ACT
Advocacy Institute
Alliance for Excellent Education
American Association of Colleges for Teacher Education
American Federation of Teachers
American Occupational Therapy Association
Association on Higher Education and Disability
Association for Middle Level Education
CAST
Council of Administrators of Special Education
Council for Exceptional Children
Center for the Collaborative Classroom
Education Northwest
Early Care and Education Consortium
Easterseals
Every Child Reading

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First Five Year Fund
First Focus Campaign for Children
Grimes Reading Institute
Higher Education Consortium
HighScope Educational Research Foundation
Home Instruction for Parents of Preschool Youngsters
Institute for Educational Leadership
International Dyslexia Association
International Literacy Association
Keys to Literacy
Knowledge Alliance
Learning Ally
Learning Disabilities Association of America
Learning First Alliance
Literacy How, Inc.
National Adolescent Literacy Coalition
National Association of Elementary School Principals
National Association of ESEA State Program Administrators
National Association of School Psychologists
National Association of Secondary School Principals
National Association of State Boards of Education
National Association of State Directors of Special Education
National Black Child Development Institute
National Black Justice Coalition
National Center for Families Learning
National Center for Learning Disabilities
National Council of Teachers of English
National Down Syndrome Congress
National Down Syndrome Society
National Education Association
National Forum to Accelerate Middle-Grades Reform
National Rural Education Association
National Urban Alliance for Effective Education
National Women's Law Center
National Writing Project
Nemours Children's Health System
Parents as Teachers
Reading Partners
Reading Recovery Council of North America
Scholastic, Inc.
School Social Work Association of America
TASH
Teach Plus

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TESOL International Association
The Arc
United Way Worldwide
WestEd
ZERO TO THREE

ⁱ U.S. Department of Education, NCES, NAEP, 2017 Reading Assessment, https://www.nationsreportcard.gov/reading_math_2017_highlights/ (accessed April 26, 2018).

ⁱⁱ J. McFarland, P. Stark, and J. Cui, *Trends in High School Dropout and Completion Rates in the United States: 2013* (NCES 2016-117) (Washington, DC: U.S. Department of Education, National Center for Education Statistics, 2016), <http://nces.ed.gov/pubsearch> (accessed May 17, 2017).