



**Senate Education Committee  
House Bill 436 Testimony  
Buckeye Association of School Administrators  
Ohio Association of Elementary School Administrators  
Ohio School Boards Association  
Ohio Association of School Business Officials  
November 17, 2020**

Good morning, Chair Lehner, Vice Chair Brenner, Ranking Member Fedor, and members of the Senate Education Committee. Thank you for the opportunity to speak to you today regarding House Bill (HB) 436. My name is Kevin Miller, and I am the Director of Governmental Relations for the Buckeye Association of School Administrators (BASA). Joining me today for this testimony are Julie Davis, Executive Director of the Ohio Association of Elementary School Administrators, and Jennifer Hogue, Director of Legislative Services for the Ohio School Boards Association. The Ohio Association of School Business Officials also supports this testimony, but Deputy Executive Director Katie Johnson is not able to join us this morning.

Our organizations represent superintendents, elementary school principals, public school district boards of education, and treasurers/CFOs, business managers and other school business officials from around the state. We are here today to provide feedback for HB 436, which would require all public schools to conduct screenings of all children in kindergarten through fifth grade and provide intervention services for those displaying risk factors for dyslexia.

Our organizations support the notion that all students receive the services needed to help them succeed. We believe Ohio does need to take steps to better identify and serve students with dyslexia. However, the solution should be deliberate, well thought out, and structured in a way that allows districts the capacity to serve students with dyslexia.

In January of this year, our organizations provided testimony regarding Substitute Senate Bill (SB) 102, which would establish the Dyslexia Screening Program. At that time, we supported important changes made in the substitute bill that we would also like to see incorporated into HB 436.

First, the latest version of SB 102 denotes that the guidelines and procedures established by the state Superintendent are done by administrative rule, making it easier to make changes as needed in the Dyslexia Screening Program. We suggest making this same change to HB 436. HB 436 is incredibly prescriptive and leaves little room for changes to be made as the legislation is implemented and lessons are learned about the capacity of Ohio's schools to serve students and the needs of students being identified and served. Many details such as what is contained in the dyslexia guidebook developed by the Ohio Dyslexia Committee would be better left to administrative rule so that changes could be made based upon the input and involvement of practitioners as programming evolves.

Second, Substitute SB 102 permits the state Superintendent to include stakeholders in the establishment of an advisory committee. We believe that the guidance of organizations such as the International Dyslexia Association is important, but also crucial to the process is ensuring the inclusion of K through 12 practitioners and higher education representatives in the development of a statewide plan. Along with including higher education representatives, HB 436 should expand the make-up of the Ohio Dyslexia Committee to include K-12 practitioners such as classroom teachers, reading specialists, school psychologists, building and district-level administrators, speech and language pathologists, and directors of student services.

The inclusion of changes made in substitute SB 102 into HB 436 would be a positive step toward ensuring that school districts can successfully screen and serve students identified with issues of dyslexia.

There are other key issues in HB 436 that should be addressed to ensure the successful implementation of a statewide program that identifies and serves students with dyslexia.

First, the legislation requires the establishment of a structured literacy certification process for teachers employed by the school. It then establishes ratios for the number of teachers certified under the structured literacy process, ultimately reaching one fully certified teacher for every 100 students, K through 3, by the end of the 2024-2025 school year. The cost and availability of training and the requirement of a practicum would make this an incredibly difficult standard for school districts to achieve. In addition, this low ratio is not necessary to effectively serve students with dyslexia. Tier I and Tier II interventions can be provided by teachers who have received training that is free of a practicum and the time and finances involved in full certification. Full certification should be reserved for those reading specialists or intervention specialists providing intensive Tier III interventions, which makes a certified teacher to student ratio of even 1 to 500 reasonable and attainable. The requirement of a practicum should be determined by the certification program the school district chooses, and not legislation. In addition, the requirement of a practicum as a component of required professional development would be an incredibly cumbersome, if not impossible, mandate for districts to implement. Classroom teachers will simply not have the time to take part in a practicum in addition to their regular classroom duties. The practicum is not a necessary element of professional development for typical classroom teachers and we suggest that it be removed from the legislation.

Second, HB 436 mandates the implementation of a structured literacy program to address the needs of students with dyslexia. There are many structured literacy programs that provide effective interventions for students struggling with reading, but they are not effective for students with dyslexia. More specifically, the legislation should require the implementation of a multi-sensory structured literacy program to best serve students with dyslexia. A research-based, multi-sensory approach is crucial to the success of any intervention program for students with dyslexia.

Third, not all would agree that kindergarten is an appropriate age to begin screening students for dyslexia because kindergartners have not yet had time to learn the basics of phonics. The Yale Center for Dyslexia and Creativity recommends beginning screening in first grade. Consider providing flexibility in HB 436 for districts to determine when to best begin screening their students. A requirement that the first screening be completed no later than the mid-point of the first-grade year would be a reasonable expectation and would reflect research-based practices. In addition, the legislation should specify that it is not necessary to screen in multiple years.

And finally, recognize that time and financial support will be crucial to the success of a statewide program that identifies and serves students with dyslexia. The fiscal note for HB 436 correctly summarizes that structured literacy certification requirements for teachers may increase costs to public schools by \$2.6 million statewide. Districts will most likely have to subsidize the cost of certification to encourage teachers to earn the required certification. Annual certification renewals may approach a million dollars. Costs for screenings could reach into the millions of dollars annually statewide, and ODE costs may increase possibly in the millions of dollars to provide the bill's required professional development in dyslexia screening and intervention practices for teachers.

Districts which have developed programs will verify that additional costs are more than a likelihood—they are a certainty. These additional costs include professional development for classroom teachers and full certification in research-based, multi-sensory structured literacy programs for reading specialists and intervention specialists. Districts will also see an increase in personnel needed to provide Tier II interventions focused on strategic, small group reading intervention and Tier III interventions focused on individualized, intensive instruction.

The fiscal note states that higher costs may be partially offset by an increase in state foundation aid for students receiving special education services; however, not all students with dyslexia are identified as having a specific learning disability, and thus, the district does not receive additional funding for those students. Even for students who are identified as having a disability, most districts do not receive full funding for their special education services. Further, it would be unfair to districts to assume the formula will cover costs for additional mandates. For example, the current funding formula is frozen at FY 2019 levels so no new state money is available for new educational services. Likewise, in previous years, many districts were capped

in the amount of growth in state funding they could receive, regardless of any increase in required services.

Dynamic Indicators of Basic Early Literacy Skills (or DIBELS), is pointed out as an effective screener at \$1 per student. However, this cost does not take into consideration the variety of screeners available, some which may be preferred more than others by practitioners. An additional expense incurred by districts will be the training of personnel—referred to in the legislation as a “multi-disciplinary team”—on the use of the screener and the time necessary to apply the screener and interpret results.

Other increased expenses will include additional time for special education supervisors, curriculum directors, and building principals to oversee the set-up, implementation, and ongoing evaluation of their district’s programming. The identification of students with dyslexia will also lead to increased demands of time for already over-burdened school psychologists.

While early screening and services for students with dyslexia may reduce expenditures for services down the road, there is currently little to no data to support this assertion. Long-term savings do not negate up-front costs that school districts must bear in order to comply with the bill’s requirements.

There are districts in Ohio that have established effective programs to identify and serve students with issues of dyslexia or phonemic awareness. While districts have reading intervention programs in place, many of those programs are not effective in addressing dyslexia. For nine years, it was my honor to serve as superintendent of Ottawa Hills Local Schools in Toledo. In 2015, we started our journey to screen our students for dyslexia and provide services for identified students. Since that time, the district has spent well over \$500,000 to implement and maintain dyslexia programming. We were fortunate. Since Ottawa Hills is a high-wealth district, we already had several components in place, such as key personnel. However, we still found that we had to increase personnel to adequately serve identified students. We also realized increased costs for materials and training. If the requirements in the bill as currently written were adopted, Ottawa Hills would need to add two licensed practitioners to what the district believes is already a successful program. When it comes time to implement the requirements of HB 436, many districts will struggle to fund both the necessary resources and increased, qualified personnel.

We come today to offer to work collaboratively with you to develop a plan forward to better serve Ohio’s students with dyslexia. Before requiring districts to screen for dyslexia and serve those students, we need to establish the infrastructure necessary in order for districts to successfully meet the components of this legislation. Among other things, this includes aligning the education programs within the state’s institutions of higher education with K-12 policies on dyslexia, incentivizing individuals to become trained in research-based programs that address the needs of students with dyslexia, and providing resources for districts to pay for staff needed to work one-on-one and in small groups of students with dyslexia.

Additionally, it is important that we build upon Ohio's Dyslexia Pilot Project to adequately determine the impact of dyslexia screening and services on special education costs. It will also be necessary to define a clear model for teacher professional development, and to develop a statewide network of qualified trainers to provide on-site teacher professional learning opportunities.

To summarize, we feel that HB 436 can impact positive change for Ohio's school districts and the students they serve by being less prescriptive, allowing the Ohio Department of Education to work with the dyslexia advisory committee to define standards for school districts as needs and programming evolve. We suggest:

1. Increasing the number of education practitioners on the advisory committee as noted in this testimony with no requirement for committee members to be certified;
2. Directing ODE to develop professional development programming but not designating the required hours of professional development in legislation;
3. Including the necessity of "multi-sensory" structured literacy programming;
4. Removing required ratios of certified teachers; instead, direct ODE to create a structure that provides for certification training through the state's Educational Service Centers;
5. Designating that screening take place January 1 of students' kindergarten year to January 1 of students' first grade year, providing for local control in deciding the best time to screen students.

Chair Lehner and members of the Senate Education Committee, thank you for this opportunity to provide input regarding HB 436. We will be happy to address your questions.