

My name is Jeffery L. Williams and I am a retired literacy coach from the Solon City School District. I have over 30 years of experience in the classroom, as a literacy coach, and teaching literacy courses to undergraduate and graduate students. I am a nationally recognized literacy speaker who is invited to present at international, national, and region literacy conferences and have written multiple peer-reviewed articles about teaching reading. I have also written 120 books for children. I want to thank the committee for allowing my testimony today on behalf of literacy educators across the state of Ohio. I stand in opposition to several provisions in HB 33 that pertain to literacy education that were inserted by Governor DeWine, specifically the misguided provisions about the three-cueing approach and about the call for ODE to determine curriculum for all Ohio schools.

1. Sec 3313.6028 of HB 33 currently reads: “Beginning not later than the 2024-2025 school year, each school district...shall use core curriculum and instructional materials in English language arts and evidence-based reading intervention programs only from the lists established under division (B) of this section. Except as provided in division (D) of this section, no district or school shall use any core curriculum, instructional materials, or intervention program in grades pre-kindergarten to five that use the three-cueing approach to teach students to read.”

The bill then goes on to attempt to define this mysterious three-cueing approach. I say mysterious here because this approach is not, in fact, a real thing. I have submitted various searches from the Education Resources Information Center, or ERIC system from the U.S. Department of Education and no matter how you label it—an approach, theory, method, instructional model...nothing turns up. As leading education author and researcher, Dr. Andrew Johnson from the University of Minnesota recently said: “Another questionable claim is that the three-cueing system is being used to teach children how to read... Never have so many people, known so little about so much. The three-cueing system is not an approach to teaching reading. If you are going to be against something, at least you should know what that something is.”

So why do so many people believe this? That is because this theory has been made up by uninformed members of the media and repeated by publishers with programs to sell. These misguided ideas have subsequently made their way into by the Ohio Dyslexia Committee who has misguided ODE, Governor Dewine or someone else in this chamber to insert this language. Oddly, you’ve already experienced this firsthand when a similar thing happened recently from the exact same sources. The original dyslexia law adopted by this body in 2021, mandated 18 hours of “multisensory structured literacy” professional development. The problem is that there is no such thing. The state board of education and ODE had to petition the legislature to fix the law, and change the already published Ohio Dyslexia Guidebook. Because the law didn’t get fixed until July of 2021, ODE did not get free modules out to districts until December causing hardships on districts to comply with the provisions of the law. I would hope that removing all language about this “three-cueing approach” from the bill would be appropriate to avoid future confusion and the need to redo the law in the coming months.

As I stated earlier, this misleading/misunderstood language insertion is also problematic because of another confusion underlying ALL reading theories that actually do exist. In reality,

all reading involves attention to at least three cues at the simplest level— meaning is derived from attention to the way language is put together, known as structure, and the visual cues—the letters, sounds, and orthography that make up words. As Dr. Mark Seidenberg, cognitive researcher and Science of Reading guru often quoted by ODE and the Ohio Dyslexia Committee, wrote:

“Texts are understood using multiple types of knowledge, including print (orthography), grammar (syntax), and meaning (semantics). These are intrinsic properties of language and writing. Texts cannot be understood without these components (and others); there is no option to skip the syntax or forgo the meanings of words. The figure also incorporates the idea of solving a problem such as word recognition by combining multiple cues, which skilled readers do without conscious effort or awareness....In fact, it is compatible with every theory of reading.”
(Seidenberg, 2017, p. 300-01)

Because of this fact that all models of reading include attention to these three cues, including ODE’s adopted model, known as the “Simple View of Reading”, from all the way back in 1986. This simple view theory (which by the way you can find in an ERIC search) is based on very similar grounds—decoding the visual information and using the language structures together leads to comprehension or meaning. Leaving misguided language about three-cueing in this bill would mean that ODE would not be able to find any materials or interventions to approve because literally everything that exists involves using three cues at least. This would lead, once again, to mass confusion and would tie the hands of districts and teachers to provide instruction. For this reason, I implore you to remove this problematic and unresearched terminology.

2. My second issue with this bill is related but is also fundamentally different. Without oversight by knowledgeable researchers that represent all aspects of the science of reading, mistakes like the ones I’ve already discussed are going to happen when ODE establishes a list of approved materials. Mistakes which will be costly to Ohio taxpayers. Adoption of new materials, based on misinformed guidance from ODE, could cost millions upon millions of dollars. Shockingly, many of the programs that would fit under the current provisions of this law are exactly the same as programs that were mandated in a federal bill called the Reading First Act in the early 2000’s. That federal experiment, with the same restrictive practices based on the Simple View of Reading spent over 5 billion dollars across 5 years. You can read the Reading First Evaluation study which showed that there were NO gains for children who had been in these programs on measures of comprehension across grades 1, 2 and 3. None. The publishers and researchers currently informing ODE, represent powerful lobbies because curricula and testing mandates represent big money. Rather than repeat this expensive lesson that failed miserably, we should learn from this and not repeat past mistakes based upon the same outdated research. I have attached the summary findings of the official federal review of Reading First for your records.

Regardless of all of this, the current bill allows, perhaps for the first time in Ohio’s history, for state workers at the Ohio Department of Education to supersede what has traditionally been

left to local control which is already written in at least two Ohio laws. While it is in the purview of the legislature and state board to direct *what* is taught, it has never been so about *how* to teach it or *with what* materials. Ohio Revised Code 3313.60 reads: “The board of education of each city, exempted village, and local school district and the board of each cooperative education school district established...shall prescribe a curriculum for all schools under its control.” As ODE’s website clearly states:

“It is the responsibility of Ohio’s local school boards of education to vet and approve curriculum and educational materials for use in the public schools within their district. The use of any materials posted or linked to on the Ohio Department of Education website, including materials within Ohio’s Learning Standards or Appendices or any state model curricula or other educational resource material, is entirely up to the discretion of each local board of education.” (<https://education.ohio.gov/State-Board>) Retrieved: May 1, 2024

From a party platform of less government, less regulation, and more local control, it is uncharacteristic for this legislature, quite literally, to do the opposite. From the stand-point of constituents who believe and support these principles, this law seems to be intrusive into the rights of local communities to determine methods and materials that best fit the needs of their children.

In summation, my three recommendations are:

1. Remove all language the mentions three-cueing because this is not a real thing. Because all approaches are based upon three specific cues, banning this would be saying that NO reading approach would be available to teachers to use. This would cause mass confusion in districts, at universities, and in classrooms across Ohio.
2. The call for “evidence-based approaches” is wise and warranted but not when viewed from a narrow perspective, like that of ODE or from an unsupervised committee. If the provisions for using “evidence-based” approaches is to remain, ODE should not work in isolation but should be required to use other Ohio university expertise or at LEAST use existing federal and non-biases sources designed specifically for this purpose. The current federal law, Every Student Succeeds Act (ESSA) also requires evidence-based decision-making for districts and the US Department of Education has two websites devoted to unbiased research reviews to help educators at state or local levels, to make decisions. Programs and materials vetted from outside on these free-platforms such as Evidence for ESSA and the What Works Clearinghouse should automatically be on Ohio’s list. In reality, one literacy intervention centered at Ohio State called Reading Recovery, actually has some of the strongest evidence of working well for students on both of those sites. This has been entirely ignored by ODE and members of Ohio’s ESC’s who continue to make false claims that this intervention is based upon faulty science. Both realities cannot be true at the same time and it is undeniable that that intervention has much better and stronger evidence than programs dubbed by Ohio as ‘structured literacy’ many of which have no evidence on these sites research reviews.

3. Finally, consider the ramifications of ODE mandating specific materials and ways of teaching that are included in the budget language. This goes against other laws and is sure to be a cumbersome battle from parent groups and communities.

References:

ORC: 3313.60 <https://codes.ohio.gov/ohio-revised-code/section-3313.60> (Retrieved 5/1/24)

ORC 3301.079 (B)(3) <https://codes.ohio.gov/ohio-revised-code/section-3301.079> (Retrieved 5/1/24)

HB33: <https://www.legislature.ohio.gov/legislation/135/hb33> (Retrieved 5/1/24)

Seidenberg, M. (2017). *Language at the Speed of Sight: How We Read, Why So Many Can't, and What Can Be Done About It*. New York: Basic Books.

Evidence for ESSA Website: <https://www.evidenceforessa.org>

What Works Clearinghouse Website: <https://ies.ed.gov/ncee/wwc/>

Dr. Andrew Johnson, University of Minnesota, Personal communication.