

Public comment received on
proposed regulations on the
Alaska Reads Act.

From: [Tobias Frieb](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Reads act
Date: Thursday, February 2, 2023 4:18:53 PM

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I'm writing to you as a kindergarten teacher in Craig Alaska who has been teaching for 10 years now. I believe the Reads act has many great proposals and regulations that will help my students learn and grow academically. I am very much opposed to adding requirements for teacher recertification. I believe this will only cause more financial trouble for all existing Alaska teachers and will deter future teachers from coming to the state. Please do not add more things to a teacher's plate. Thank you for hearing my concerns and I look forward to hearing back from you.--

Tobias Frieb

[REDACTED]

From: [Amber Cunningham](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act
Date: Tuesday, February 7, 2023 9:26:25 AM

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To whom it may concern,

My children would not have passed the 3rd grade if this would have been in place when they were younger, and they are thriving as adults and in high school, plus maintain a 4.0 and in AP classes. Furthermore, their passion for science and math would not have been nurtured when they were young as the primary focus would have been reading. It is good to help families and students who are struggling in reading and provide extra support, but I do not believe this is the answer and will do more harm than good.

Amber Cunningham

From: [Emily Elizabeth](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Stop all standardize testing - Do not add more to the already ridiculous amount of 'standards and requirements' thrown at our kids.
Date: Tuesday, February 7, 2023 11:07:11 PM

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To whom it may concern -

I adamantly oppose the proposed plan to implement more testing and requirements to pass school grades. Our education system is already the worst in the developed world because we implement ridiculous standards that require kids to learn things and do things that they are not developmentally ready for yet. We also grossly underfund our schools and expect teachers to be able to teach all students in the same classroom even though a large portion of students - especially neurodiverse students - would benefit from smaller classrooms that are designed to minimize sensory overload.

My children are on the spectrum. All of them have struggled academically in different areas - even though they have superior IQs. I taught all three of my older kids to read, write, do basic math, count to twenty, know all the basic colors, shapes, animals and so on before they entered kindergarten - even my daughter who didn't speak until she was 5. When they started public school, every one of them lost access to all that knowledge.

I didn't understand why back then but have learned a lot over the years about their ADHD and other neurological conditions. They lose access to knowledge, especially when they are overwhelmed sensory wise. Eventually, as they got older, they were more able to cope in the classroom setting - but still struggled with basic academics. Reading was especially difficult for them due to their dyslexia. I worked tirelessly with each of them at home. We read for hours and hours each day. My kids always loved reading and used it as an escape - even if they weren't reading the words.

To make a long story short - my kids could barely read in third grade. But by the time they were in sixth grade - they were reading and comprehending at a college level.

Every child develops and learns differently and at their own pace. Our government needs to stop enforcing arbitrary rules and tests that serve absolutely no purpose. All these laws do is create more barriers for neurodivergant, non abled bodied people to navigate and break through in order to access their education. These tests and requirements to move to the next grade discriminate against everyone who isn't neurotypical and abled bodied.

The proposed plan for reading in schools should be withdrawn from the table because it is illegal and directly against an ADA laws that require equal access to education for ALL students, not just neurotypical students that follow a typical road of development and learning.

Stop wasting money on useless tests and requirements so more time and money can be used to invest in our teachers and schools to allow them to provide the highest quality of education to each and every student. It's time we meet the students where they are at instead add more stress and anxiety inflicting tests to their lives.

Sincerely,

Emily Elizabeth
Mother of 4 neurodiverse school aged children
Scout Leader
STEAM and Forest School Educator

From: [Chris Granger](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Reads act
Date: Friday, February 10, 2023 8:12:17 PM

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Good evening,

I appreciate all that has been put forward for the Reads Act.

I do find that there is a very important factor that has been overlooked and that is the date cutoff for entering school.

I feel it would benefit this Bill if the cutoff was moved to May 31st.

If you are wanting to improve reading scores you need to start with the basics. This is making sure that children are ready for reading. When a Kindergarten student is 4years old when school starts they are not ready to learn to read. Their young minds are not developed enough.

For the Bill to be more successful please consider moving the school entrance cutoff date to May 31st.

Thank you for your time.

Christina Granger

From: [Smith, Allison](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act Comments
Date: Sunday, February 12, 2023 12:47:01 PM

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Dear Alaska Department of Education and Early Development,

I am writing to share my concerns regarding the implementation of the Alaska Reads Act. I agree that children should be reading by the end of grade three and that they need support to achieve that goal. However, many of the requirements outlined in the proposed law will be difficult or impossible to implement given our current staffing and budget situation.

As a first grade teacher in the Juneau School District, I currently have 23 students in my class. At the beginning of the year benchmark, 11 of those students scored below benchmark and 8 of them scored well below benchmark. This data would require me to have 19 meetings with families in one month to create Individualized Reading Improvement Plans. Based on the length of the Individualized Reading Improvement Plan document, each meeting would take at least half an hour, in addition to at least a half an hour to complete each document. Nineteen hours of additional work and meetings during the school day is not possible because of substitute shortages and limited preparation time. Outside of the school day you will be asking teachers to donate their own time and work outside of contracted hours.

My current data would also require 8 students to receive outside of school instruction. We do not currently have staff or funding to provide outside of school instruction. Several of the students in my classroom who scored well below grade level rely on the school bus for transportation. The law does not provide transportation for these students so their families would not be able to comply with this mandate.

My classroom's data represents just one out of nine K-3 classrooms in our school. If each classroom has an average of just 10 students who fall below or well below the benchmark, that would be 90 students that require intervention from a reading specialist. Our school has one full time reading specialist. For her to provide tier 2 and/or tier 3 instruction for those 90 students in small groups (4-8 or 2-4) would be physically impossible. For an average group size of 4 students, 22 groups would need to meet each day. Taking into account the reading specialist's preparation time and required breaks, this allows only 13 minutes per group per day. This does not include time required for progress monitoring of these students or the 3-5 minutes it takes for the students to travel from their classroom to

the reading teacher's classroom.

Without an increase in funding or staffing, the mandates outlined in the Alaska Reads Act are impossible to implement. I encourage the Department to reconsider students who require Individualized Reading Improvement Plans and focus solely on the students who score well below benchmark until funding and staffing can be increased. I also strongly encourage the DEED to drop the requirement for after school reading programs unless additional funding for staffing the program and transportation can be provided.

Thank you for your consideration,

Allison Smith

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act
Date: Friday, February 17, 2023 5:20:52 PM

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As an educator, I find it exciting for the state to realize the importance of a strong reading program in primary classes.

However, I find it extremely disheartening that they will place the financial burden upon teachers to pay for the testing and endorsement that is mandated by the state. Additionally, there will not be any financial compensation for the additional hours it will require.

According to the DEED website, existing master degrees in reading or National Board Certification will not be accepted as a substitute. That is difficult to hear considering how many teachers have taken student loans to further their education.

In a state which is fiscally solvent, yet facing a teacher shortage, I feel legislators should reconsider their proposal. Teachers are tired, most feel unappreciated and many of us have been offered only 1% pay raises the last few years. Our salaries can't keep up with inflation but now it will cost us even more to work. That doesn't seem right.

Susan Olsen
MSBSD
M. Ed. Curriculum and Instruction
Sent from my iPhone

From: [Chris Granger](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Reads act- age change
Date: Saturday, February 18, 2023 9:32:29 PM

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To Whom this may concern,

I am a kindergarten teacher that would like to make a request that the cutoff for entering school be changed. I would like to request the cutoff be moved to May 31st.

As it is now (September 1st), there are kindergarten students entering at age four. Most of these students that enter at age four are not developmentally ready for the rigorous education they are expected to learn.

I have retained several of these students that started Kindergarten at four. They blossom that second year of Kindergarten because they are developmentally ready for what is expected of them.

If you would like for this Act to be successful. I would suggest you change the cutoff date to enter Kindergarten to May 31st.

Please consider this request.

Thank you,

Christina Granger
Kindergarten Teacher

Comments on: NOTICE OF PROPOSED CHANGES ON THE ALASKA READS ACT IN THE REGULATIONS OF DEPARTMENT OF EDUCATION AND EARLY DEVELOPMENT

Submitted By	Comment
2/18/2023 1:59:41 PM	Middle and high school students need to read quality literature, at the rate of one book every week or ten days
Anchorage, AK, US Anonymous User	

From: [Ritter, Kathryn](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Cc: [Stacy Diouf](#); [Schleck, Catherine](#)
Subject: Alaska Reads Act comments
Date: Sunday, February 19, 2023 1:10:43 PM

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I have one question that perhaps is or is not addressed in the Alaska Reads Act:

Will there be any support for current 3rd-5th graders who are not reading proficiently? It seems that this act will increase the accountability for students entering kindergarten through third grade after the Alaska Reads Act passes, but what about the students whose reading progress was affected THE GREATEST by the global pandemic, those students who are currently 3rd, 4th and 5th graders? Will their reading needs be addressed by any additional support, either with supplemental reading programs, small group instruction, or progress monitoring?

I am a third grade teacher, and currently, 17 out of 25 of my students are not meeting the Dibels benchmark and require additional support and progress monitoring. Will these students as 4th graders next year not get the help they need to make adequate growth in reading? These are the same children who were in lockdown during their critical early literacy years in 2020 and 2021--how can this comprehensive act be leaving those children behind? They are the children that need the most support!

If I have missed a part of the Alaska Reads Act that outlines support for intermediate readers, grades 4, 5, and 6, please let me know.

My comment is about the \$50 fee required of teachers K-3 to get a special Science of Reading or other certification. I think this is inequitable, and the fee should be covered by the State of Alaska.

Thank you for taking my comments into consideration.

--

Katy Ritter

[REDACTED]

From: [Todd Nemyo](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act - where are the librarians
Date: Friday, February 24, 2023 2:14:27 PM

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Hello, I must ask this question. The Kenai Peninsula School District has according to their website,

<https://kpbsd.org/>

8,301 students and 42 schools. The entire school district has only 4 certified librarians. How do 38 schools in our school district help teach students to read, without a certified librarian? Please answer this question.

Best,
Todd Nemyo

From: [Amanda Durrant](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act
Date: Tuesday, February 28, 2023 8:11:38 PM

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Good evening,

I'm writing to oppose the current Alaska Reads Act regulations. Kids need time to be kids, imposing extra hours of reading during summer school or after hours is not the best option. A love of reading, not being forced, needs to be fostered in our students. Schools need more funding for qualified staff to work with students during the school day. The current regulations puts entirely too much extra responsibility on our overworked and under paid educational staff. Limiting class size, providing more one on one or small group support, and funding for additional resources should be the focus instead of demanding more from our educators and children. Children struggling with reading need in school interventions and IEPs, as determined with appropriate and timely evaluation to obtain these learning accommodations. Funding programs that provide free meals, free access to early childhood education, and ensuring adequate quality educators through scholarships and competitive pay and benefits will address many of the barriers to reading deficiencies. As a recipient of free meals, 2 years of free head start, state provided medical insurance, and food assistance as a child, I was able to reach the educational achievements required to graduate high school, obtain a Bachelors of Science degree, and a post graduate certification...proof that these programs work!

Sincerely,

Amanda Durrant, MLS(ASCP)CM

From: [Grant Guy](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act Comments
Date: Thursday, March 2, 2023 5:43:11 PM

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To Whom It May Concern,

My name is Grant Guy and I am the parent of two public school children and the principal of Woodriver Elementary in Fairbanks, Alaska. I am writing to provide comment on the Alaska Reads Act (ARA) and how I believe it can be improved. I support some of the underlying principles of the ARA. We want students to read on grade level by 3rd grade. However, this Act adds a large number of requirements for school districts, school level administrators and teachers including; 1. Intensive reading intervention services to students in K-3rd grade who exhibit a reading deficiency. 2. Submittal of a reading plan to DEED by September 1 of each year based on the K-3 MTSS reading plan. 3. Individual reading improvement plans for each student who is determined to have a reading deficiency. 4. Meetings with parents to review student progress and discuss retention of students who are not meeting grade level expectations (parents can sign a waiver to elect to have their student progress to the next grade). I would love to offer intensive reading intervention services to my students. In fact, ten years ago we had a robust and successful MTSS system in place. However, due to the flat funding our state has provided districts, we had to cut that support.

I would love to see individual improvement plans created for each student who is not meeting our state standards, however, who is going to create these plans? Teachers and principals obviously, but where is that time going to come from? For every moment you have a teacher creating a plan, they are not teaching, planning instruction, grading papers, collaborating with peers or communicating with parents. As a principal, I would love to meet with parents to review their student's progress, but again, where is the extra time necessary for these meetings going to come from? Do I spend less time with discipline, teacher evaluations, or school safety? You will need people to complete all of this work. The Fairbanks North Star School District spends roughly 87% of our budget on people. It is the single largest expense we have. But we have been cutting people for the last 10 years. We have been cutting entire programs. We have been reducing the supports we have in schools. We have even been closing schools. All to save money. I support the idea of the Alaska Reads Act, but what is missing is the funding necessary to carry out this legislation. Thirty dollars is not enough. The Alaska Reads Act appears to be modeled after the Florida Just Read Act, which kicked off a number of "Read's Acts" across our country. Florida passed their act in 2001. They included

500 dollars per child to fund their mandate (approximately 825 dollars when adjusted for inflation). In 2013 Colorado passed a similar act. Adjusted for inflation they included approximately 1000 dollars per child.

With 330 students, Woodriver Elementary would receive approximately 10,000 dollars through the Alaska Reads Act. That might be enough money to hire two temporary 15 dollar per hour employees for 14.75 hours a week. They have to be 14.75 hour employees, because to make them benefited positions (over 15 hours per week) it would cost another 5,700 dollars. So how am I supposed to attract highly qualified applicants to oversee a reading intervention program (MTSS), when I can only offer low hours and low pay (about 5,000 dollars a year)? The funding attached to this Act is setting schools up for failure. There has not been an increase to the BSA since 2017. Inflation and health care costs are decimating the budgets of schools across our state. You want kids to read on grade level, and so do I, but a thirty dollar increase to the BSA will not provide students at my school with the resources necessary to implement any meaningful improvement. I support many elements of the ARA, but it needs to be funded properly to allow schools to have a chance at achieving this worthy goal of kids reading on grade level.

Sincerely,

Grant L. Guy

Public Comment on Alaska Reads Act

Ann Liebergesell



Positive aspects of ARA:

- 1) Teacher professional development in the Science of Reading by 7/1/2024
- 2) Parent notification and Individual Reading Plans for students determined to be deficient in reading skills K-3. Concerns as well--see below
- 3) Summer school for students with reading deficiencies. Concerns as well—see below.

Concerns:

1) The timing of the regulations proposed is off. We are still recovering from learning losses from the COVID-19 pandemic. I have 2nd grade students who had never been to school before. They are making progress, but to even consider having them held back at the end of third grade would be unfair. Teachers have until July 1, 2024 to get the science of reading training. This plan should be phased in for students as well.

2) Using DIBELS results as the only criteria for reading development is not sufficient or reliable. The process of screening is imprecise, and affected by factors such as:

- student/assessor relationship
- emotional state of the student at the time of screening
- unfamiliarity and/or pressure involved with the screening process
- delay in pace of reading due to efforts to make sense of nonsense words
- assessment inclusion of word lists that have not yet been taught despite explicit instruction using a systematic scope and sequence
- assessment of reading fluency and accuracy using leveled text rather than decodable text—beginning readers need decodable text in order to reliably measure growth

Screening measures can be a valuable tool for assessing reading ability and deficits in conjunction with other measures. Used alone, screening measures have limitations. According to Louisa C. Moats and Carol A. Tolman (authors of LETRS, a professional development course grounded in the science of reading), “many students score below the desirable benchmark on oral reading fluency and other skills, but they are going to be adequate in overall reading skills. Potential poor readers are overidentified—caught in the safety net of the ‘strategic intervention’ range. In order to identify 90 percent of those who will have genuine difficulty, the ‘benchmark’ cut-point on the screening test is set high.” I have witnessed this in my teaching practice, where students who can read grade level text actually score below benchmark on the DIBELS. Moats and Tolman go on to say, “Therefore, screening tests *alone* should not be the basis of determining who needs small-group instruction or what kind of instruction will help. Screening results should be checked against other sources of information, including teacher observations, a student’s history, a student’s classroom performance, and diagnostic surveys.” Other assessments should be considered, and students should be assessed on what they have been taught.

3) Truancy needs to be addressed. Students can't learn if they are not in school for instruction. Lack of attendance poses a strain on teachers trying to catch students up.

4) Administration of the program for Act compliance: forms and paperwork needs simplification. School reading specialists' time is best utilized actually teaching students. The way the Act is laid out right now, reading specialist and/or teachers would spend an inordinate amount of time administering the program (filling out paperwork, meeting with parents, tracking data, following up with classroom teachers, submitting reports) OR, a new position will need to be created with no extra funding provided, posing additional strain on already underfunded schools/districts.

5) Parent Notification and Retention of Students in 3rd grade: While many parents would be on board with an Individual Reading Plan for their child and willing and able to support their child in learning to read, there are still many families (particularly at Title 1 schools) who are barely managing their own lives or have had bad experience with their own schooling. The prospect of retaining students in 3rd grade has the potential to erode teacher/school/parent relationships, cause a class size bubble at the 3rd grade level, and possibly cause parents to remove their children from school. This plan needs to be modified to align with the Department's focus on culturally responsive practice. Will extra funding for additional 3rd grade teachers be provided by the State?

6) 20 hours of Summer School requirement—Summer school is often necessary to lessen learning loss and promote learning, however, there are current summer programs that are recommended to parents of students who are behind in their learning and many of those who need it most do not attend. How does DEED plan to ensure that parents will get their children to attend? How will districts find/recruit teachers to teach in the summer?

Thank you for the opportunity to provide public comment.

Ann Liebergesell

Moats, L.C. & Tolman, C. (2019). *Language Essentials for Teachers of Reading and Spelling (LETRS 3rd Edition)*. Voyager Sopris Learning.

From: [Kerri Curtiss](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Advocating for what is best for children and realistic in the classroom.
Date: Friday, March 3, 2023 9:21:20 AM

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Our district is not afraid of accountability for our kids, and we all agree that reading by 3rd grade is important. I am concerned about the tight timelines for making this happen. The regulations will be voted on in April and must be in place by July 1, 2023. This is a nearly impossible timeline and will place incredible stress on our teachers and students. Finding highly qualified teachers is a challenge already, and these additional requirements are adding to this challenge. We have incredible teachers in Petersburg and they will do everything they can to meet the needs of our students, but there is a limit. I would ask that some of the timelines in this law be pushed back by one year to July 1, 2024. I would ask that districts have this year to pilot the new screening tool, new reading curriculum, and new individual reading plans. I would ask that you advocate for additional funding so districts can effectively implement the many requirements of the READS Act. This Act will require districts to hire more reading teachers and aides with no additional funding. It requires after-school interventions and additional summer school. Where is the money coming from to do all of this? Please support our teachers and students by making next year a pilot year, and requiring full implementation by July 1, 2024.

Warmly a very concerned parent and first-grade teacher,
Kerri Curtiss

[REDACTED]

From: [Heidi](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska READS Act (public comment)
Date: Friday, March 3, 2023 10:28:45 AM

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To whom it may concern;

My name is Heidi Hall, I am writing to voice my concern regarding the Alaska READS act. In the law it says that children that have not reached reading standards by 3rd grade will be held back a grade. This clause should be removed, it will not benefit the child to be withheld a year in school if they are not meeting standards. It will cause feelings of failure and embarrassment for the student. Their peers whom they've made friendships with will continue into the next grade and leave them feeling ashamed, punished and not "smart enough" to go onto the next level. There is also potential for bullying.

An issue of concern is that the majority of students in 3rd grade whom have reading issues are dyslexic and the state of Alaska has no trained professional or specific programs to assist students with dyslexia. There are reading specialists, but no dyslexia specialists. Children who are behind in reading typically will catch up. I would know as I was one of them. It took me till 5th grade to learn to read well and my mother was a teacher with a masters in reading. I now have my Bachelors degree.

I think lawmakers need to re-visit this law and discuss it with reading specialists in the state of alaska. They should definitely not withhold a child if they are not meeting standards. All children learn at different paces and imagine how your own child would feel if you held them back a grade.

Thanks you for listening,
Heidi Hall

From: [Kelsie Ward](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act Comment
Date: Friday, March 3, 2023 3:52:49 PM

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To Whom it May Concern,

My name is Kelsie Ward. I would like to comment on the Alaska Reads Act.

After reading this act, I was shocked that the state of Alaska feels that this fixes various issues in education. I am also shocked that this is the area that Alaska feels they should focus on, when education is comprised of many subjects.

I am a mother of four children. Of my four kids, one is delayed and has a harder time reading. He is in 4th grade and reading at the 2nd grade level. He has been in reading intervention (as well as speech therapy) for years. After years of trying and, myself and child, working **extremely** hard, we requested that he be tested for special education. It was determined that he has a learning disorder and is now receiving services for reading.

If this legislation included the 4th and 5th grade students, my child would be recommended for retainment. After the years of intervention, the thought of him being told to remain in the previous grade, is heartbreaking, especially seeing that he does have an active IEP. This would create a negative view of school, instead of school being a place that my son wants to be. There are numerous peer-reviewed studies that demonstrate that retainment does more harm to the overall academic success of students than providing support. If you would like evidence of these studies, I would be happy to provide them to you.

I am also an elementary school teacher for the Juneau School District. Throughout my husband's military career, I have worked in schools (in various capacities) in Astoria, Oregon, Milwaukee, Wisconsin, Kodiak, Alaska, and now Juneau, Alaska. One key difference that I have witnessed in various states includes truancy laws and the compulsory school age.

Wouldn't it make more sense to discuss implementing truancy laws and making sure students are required to be at school every day?

Wouldn't lowering the compulsory school age/requiring kindergarten/funding transitional kindergarten provide the foundational skills required for students to lead better academic success?

I think that this act has good intentions, but we're looking at one piece of the puzzle and attaching life-altering actions to it.

Let's get kids in school earlier and make sure that they are required to attend! I dare to assume that we'll see their reading scores (as well as many other scores) increase.

Thank you for your time. I am available by phone or email if any further comment is needed.

My best,

Kelsie Ward



From: [Gwenna Corvez](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act Comments
Date: Friday, March 3, 2023 6:52:14 PM

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Dear Alaska Department of Education and Early Development,

I am writing to share my concerns regarding the implementation of the Alaska Reads Act. I agree that children should become efficient and effective readers and that they need support to achieve that goal. However, The Alaska Reads Act takes big actions based on a very narrow definition of literacy achievement.

The widespread use of DIBELS (Dynamic Indicator of Basic Early Literacy Skills) worries me. If DIBELS becomes the main assessment tool to determine students' literacy competencies, it will shape instructions in ways that are harmful to children. While students do need explicit and systematic phonics instruction, this can best be achieved within the context of great literature and integrated studies. Unfortunately, DIBELS encourages speed and decontextualized instruction at the expense of rich, thoughtful engagement in meaningful, cross-curricular literacy tasks. I am concerned that the students who most need to be brought into the school system through an education that responds to their personal interests and experiences will be the ones who are pulled out of class and given skill and drill tasks in order to improve their DIBELS scores.

The Alaska Reads Act is likely to discourage children, demoralize teachers, and create poor relationships with families who will be told within the first weeks of kindergarten that their child is already failing at reading. In addition, grade retention has been proven over and over again to have deleterious effects on students. The Alaska Reads Act is a simplified and flawed "solution" to a very complex process and it is clear who has the most to lose from this push for the "Science of Reading": as always, it will be minority children and children from lower socioeconomic backgrounds - children who have historically scored lower on these types of assessments and who already drop out of school at higher rates.

As a teacher with 14 years of experience, I want to make sure we do not lose sight of what is most important: creating enthusiastic readers who read for knowledge and pleasure and understand a variety of materials. For that to happen we need to place the whole student at the center of our instructional practices and honor all that they bring to our classroom. We need to start from a place that allows us to discover their strengths and what excites them about the world. We need to meet children and their families from a place of respect and

humility. We need to adapt the curriculum to their individual needs. Great teachers already do this; the Alaska Reads Act will actually make it harder for them to do so.

Thank you for your consideration,

Gwenna Corvez

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Alaska Reads Act
Date: Friday, March 3, 2023 3:07:01 PM

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Dear Commissioner,

This letter is in response to the current Alaska Reads Act requirements proposal for teacher certification. I have 31 years in education including a master's degree and numerous credits beyond. Twenty-nine years are in early childhood teaching reading and literacy skills to young children (three years teaching preschool, twenty-six years teaching kindergarten.) It is concerning that I would need to obtain a required reading endorsement, either through classes or a test within two years to continue teaching. I recently recertified and will be obtaining a lifetime certificate the next time. I am currently planning on teaching for four more years, however without a reading endorsement, I may be done in two years. I am on the tail end of my career and am not planning on taking more classes to obtain a reading endorsement. It is frustrating that in light of the state of education and lack of teachers that the state is putting more requirements on teachers. Is it possible to "grandfather" in veteran teachers and require this new proposal for new teachers? Teaching is a tough career already and making it harder on teachers is not the way to entice young people or keep quality teachers who are currently working in classrooms. Please reconsider the reading endorsement requirements for the Alaska Reads Act. Thank you for your time.

Respectfully,

Tina Krieger

March 3, 2023

Commissioner's Office
Department of Education and Early Development
Attn: Regulations Review
333 Willoughby Avenue, 9th Floor, SOB
P.O. Box 110500
Juneau, Alaska 99811-0500

RE: Proposed regulation changes dealing with the Alaska Reads Act

To whom it may concern:

Thank you for the opportunity to provide comment on the proposed regulations for implementation of the Alaska Reads Act (enrolled HB 114). Coalition for Education Equity respectfully submits the following comments and is also attaching a more in-depth analysis with recommendations for specific sections of the proposed regulations.

After reviewing the proposed regulations in toto, we have the following concerns and comments:

- In general, the proposed regulations lack detail around departmental support for school districts in the implementation of the Alaska Reads Act. How will DEED help and provide resources for districts and schools to meet the needs of students?
- The burden on school districts for implementation of these regulations is great, with no supplementary funding provided to assist with the manhours required to meet the requirements. We recognize that funding assistance is outside the parameters of these regulations, but departmental support, guidance, templates, and resources could alleviate the strain on districts and avoid duplication of effort.
- What specific support will be provided for districts who have dual-language and/or immersion programs? The enrolled legislation and corresponding regulation (4 AAC 06.400) regarding statewide literacy screening and support indicates that the department will provide assistance for districts in developing alternative standardized reading screening tools in any language. How and when will this occur?
- How will the department support districts in the implementation of their district reading program and intervention services and strategies for dual-language and/or immersion programs?

Regarding specific regulations:

- 4 AAC 06.320 states that reading specialists **shall** deliver the support in a distance delivery model with one annual site visit. We feel that this

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definition neither meets the intent of the statute nor does the proposed regulation offer an alternative for supporting districts in an on-site model. We do not believe that the proposed model will provide the opportunity for the Reading Specialist to complete the activities in statute with fidelity or provide intensive support to districts.

- 4 AAC 06.400. Our understanding of the statute (AS 14.30.760) is that the department shall adopt a statewide screening tool, support teachers K-3 by administering the statewide screening tool, provide methods to monitor student progress, provide targeted instruction based on student needs as determined by the results of the screening tool, and provide additional assistance (as determined by the department). It is not clear from the regulation: 1) what process and criteria are being used by the department to select the statewide screening tool; 2) what diagnostic tools will be used to assess risk for dyslexia; 3) what methods will be provided to monitor student progress; 4) how the department will provide targeted instruction based on student needs; and 5) what additional assistance may/will be provided.
- 4 AAC 06.405. We believe this regulation should provide greater detail regarding the process for identifying/clarifying supplemental and intervention supports, materials, and services (as indicated through the MTSS model). How will the department provide guidance to districts on how to do this? What will be provided in the department’s K-3 MTSS reading plan template? How and when can school districts access this template and additional guidance?

We have additional, more in-depth comments in the attached analysis, accompanied by included recommendations and/or requests for improvements. We are happy to provide clarification or additional detail if desired. Our ultimate objective is to ensure that our schools have the tools and resources they need to adequately meet the needs of their students through successful implementation of the Alaska Reads Act.

It is our belief that the success of the implementation of the Alaska Reads Act is intrinsically linked to the strength and clarity of the regulations and substantive, collaborative guidance and support from the department for school district administrators and educators. We sincerely hope that there will be another set of these draft regulations provided in response to the public comments, and that Alaska’s educators, administrators, and education stakeholders will be engaged in regular dialogue to provide constructive input and feedback for the continued improvement of these regulations.

Sincerely,

Sarah Sledge
Executive Director

Jamie Burgess
President

Enclosure: 2023_03_03 Proposed Reads Act Regulation Analysis_Coalition for Education Equity

RE: Draft Reads Act Regulations provided by DEED January 25, 2023

A review of the proposed regulations provided by DEED left Coalition for Education Equity reviewers with several questions to provide clarity. Below is an overview of our questions and requests for further clarification from DEED.

Proposed Regulation

4 AAC 06.300 Purpose

(a) The department reading program provides direct reading intervention support to participating schools as provided in AS 14.30.765 and 14.30.770.

(b) The department shall provide to eligible schools support from a reading specialist employed by the department and funding to implement the reading improvement goals identified in the K-3 intensive school reading improvement plan, including intervention materials

4 AAC 06.320 Reading Specialists

(a) The department shall employ reading specialists and assign reading specialists to eligible schools. An individual employed by the department as a reading specialist must

- (1) hold a teacher certificate issued under 4 AAC 12.305;
- (2) meet the requirements of AS 14.30.770(d)(2) and (d)(3); and
- (3) complete, within one year after the person's date of hire, three semester hours of indigenous language learning and three semester hours of culturally responsive education.

(b) Reading specialists shall deliver support in a distance-delivery model except that reading specialist shall conduct at least one annual site visit.

(c) In addition to the duties outlined in 14.30.770 a reading specialist shall

- (1) create specific improvement goals with measures of interim progress for each school;
- (2) purchase intervention materials to support the improvement goals;
- (3) review staff development plans in reading for effectiveness and provide feedback; and
- (4) help design the school's daily schedule for reading, modeled after a response to intervention or multi-tiered system of support.

(d) Reading specialists shall provide progress reports to the department on a quarterly basis, including progress on specific improvement goals in (c)(1) above.

CEE Comments

The regulation 4AAC 06.320 (b) states that reading specialists shall deliver the support in a distance delivery model with one annual site visit. Reviewers feel that this definition neither meets the intent of the statute nor does the proposed regulation offer an alternative for supporting districts in an on-site model. The use of the word “shall” requires the reading specialist to be

remote. Reviewers feel this does not provide sufficient opportunity for the Reading Specialist to complete the activities in statute with fidelity or provide intensive support to districts.

Reviewers request DEED change 4 AAC 06.320 to reflect the needs of Alaska school districts by first, allowing Reading Specialists to be based within school district boundaries or at a minimum, require more frequent and at a minimum quarterly, meetings (or 3x per year – BOY, MOY, EOY).

Proposed Regulation 4AAC 06.400

4 AAC 06.400. Statewide literacy screening and support. (a) The department shall provide a statewide screening tool and associated resources to all school districts to assess student reading skills. The department shall provide to school districts

- (1) training on evidence-based instruction based on student needs, assistance in interpreting screening results, and training in the science of reading;
- (2) training on using the statewide screening tool to identify students who will need an assessment for dyslexia; and
- (3) assistance in developing an alternative standardized reading screening tool as provided in AS 14.30.760, if requested by a school district.

(b) Except as provided in (e), each school district shall assess all students in kindergarten through grade three each fall using the statewide screening tool as provided in AS 14.30.760 and shall

- (1) identify students with reading deficiencies and require these students to take a winter and spring assessment; and
- (2) identify students with sufficient reading skills, who are not required to take a winter or spring assessment.

(c) Districts shall identify the early education programs and report the scores from the statewide screening tool as provided in AS 14.30.760, not later than July 15 of every year.

(e) A school district may request a waiver from the requirement that it use the department provided statewide literacy screening tool. The department shall make available to all school districts a K-3 literacy screener waiver form. The commissioner will grant the K-3 literacy screener waiver if the district selected screening tool is an evidence-based screening tool consistent with AS 14.30.760 and meets the requirements of this subsection. A K-3 literacy screener waiver granted by the commissioner to a school district becomes void if the school district selects a new screening tool. An application for a K-3 literacy screener waiver must be submitted in writing by April 15 to be considered for use in the following school year and must include

- (1) a description of the district selected screening tool and how it meets the requirements of AS 14.30.760;

- (2) a dyslexia screener;
- (3) the reason for seeking the waiver; and
- (4) any additional information supporting the district’s request for a waiver.

CEE Comments

4 AAC 06 400 outlines the process for utilization of a screening tool. However, further in the regulation DEED appears to be describing a progress monitoring tool. Screening tools are given to identify risk. Further diagnostic tools support understanding of risk and a progress monitoring tool is used to monitor student progress. It appears that the regulation is conflating the tools used in the MTSS assessment process in 4 AAC 06. 400.

Reviewers suggest DEED outline a full assessment cycle inclusive of the following: screening to identify risk given within a specific school year entry date, ongoing progress monitoring for students who are meeting or exceeding benchmark expectations, further diagnostics for students who have screened below or well below benchmark, and finally alignment to Alaska State Summative Assessment AK STAR cut scores. Detail how the regulation supports the MTSS process outlined in statute.

Further, while 4 AAC 06.400 (e) (3) mentions dyslexia screening, there is no mention of the specific subskills that would be included in such screening. Reviewers suggest that DEED outline known indicators for risk of dyslexia such as the use of Rapid Automatic Naming or other measures to fully support screening for indicators of risk of dyslexia. Additionally, students who are identified as at risk for dyslexia should be considered for further diagnosis and evaluation in line with new IDEA guidelines.

Proposed Regulation

4 AAC 06.405 Reading intervention services and strategies.

- (a) A school district shall offer intensive reading intervention services to students in kindergarten through grade three who exhibit a reading deficiency as provided in AS 14.30.765.
- (b) Each school district must submit to the department by September 1 of each year a reading plan to provide services described in (a) based on a response to intervention or multi-tiered system of support (MTSS) model, known as the K-3 MTSS reading plan. A school district may resubmit a department approved K-3 MTSS reading plan from the prior school year, if the district reading plan and intervention services have not changed.
- (c) The department shall provide a K-3 MTSS reading plan template to school districts.
- (d) Each school district’s K-3 MTSS reading plan must comply with AS 14.30.765 and must include

- (1) identification of the literacy screening tool to be used and the proposed schedule that is in alignment with statewide assessment schedules;
- (2) description of the adopted core reading program for students in kindergarten through grade three;
- (3) description of the district’s progress monitoring tool and the proposed schedule;
- (4) a parent notification of student reading deficiency letter template;
- (5) an individual reading improvement plan template;
- (6) description of home supports for early literacy development; and
- (7) description of reading-related professional development for staff working with students in kindergarten through grade three.

CEE Comments

4AAC 06.405 requires districts to offer “intensive” reading intervention strategies through the use of the word “shall”. However, 4 AAC 06.405 (d) (2) only offers to review a core reading program. There is no mention of a supplemental or intervention program. Core programming is used to support universal instruction. A full MTSS model would need to address all three tiers of instruction. What is the process for identifying supplemental and intervention supports for students? What are the components of the supplemental and intervention services?

Further, there is no mention of a tool used to identify those students most at risk of reading failure beyond screening. To best meet the needs of all learners, a full comprehensive assessment system must be either adopted or included as part of a MTSS plan.

Reviewers suggest that DEED expand the requirements for districts to adopt a core, supplemental and intervention program. Additionally, steps should be taken to ensure that all materials meet tiered instruction criteria including the accurate screening, diagnosis, progress monitoring, and alignment to summative assessments.

Related to intervention plans in 4 AAC 06.405 (7) asks districts to provide a description of the professional development plan for staff working with students in kindergarten through grade three. However, there is no mention of the types of professional learning that would be approved and how that professional learning is tied to the instructional programming mentioned above.

Reviewers suggest DEED provide more detail on the professional learning plans and how those plans will address the unique needs of learners in each district.

Proposed Regulations

- 4 AAC 60.200 Early education program grants; applications; duration; award determinations.
- 4 AAC 60.205 District-wide early education program grant recipient obligations.

CEE Comments

AS 14.03.410(a) states that “The department shall provide training and assistance to develop and improve district-wide early education programs that comply with standards adopted by the board under AS 14.07.165(a)(5).” The proposed regulation(s) do not address how this support will be provided to districts, only the requirements for the grant application and acceptance process (4 AAC 60.200) and the obligations of the grant recipient districts (4 AAC 60.205).

Reviewers suggest a section be added that outlines the support, training, and assistance that will be provided to both district-wide early education program grant recipients and to other districts seeking to develop and improve their early education programs.

From: [REDACTED]
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Public comment on Alaska Reads Act
Date: Friday, March 3, 2023 9:41:29 AM

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Hello Commissioner and the Department of Education team.

Our family currently has a 2nd grade delayed reader with a complication of apraxia that affects the process of reading aloud, and comprehension delay related to proper pronunciation of words.

Being pulled out of class and singled out as delayed is already perceived by our child, and it has a specific impact to self-confidence and their desire to be perceived as a “normal” kid. While we as adults don’t use that word in speaking about developing children, it is a perception of not being like others that is very real to our child. I would be willing to speculate that is a feeling not unique to our student.

Our feedback for you is that considerations regarding holding a child back should have a carve out for students already evaluated for an IEP. Specifically, where interventions have been assigned that include reading comprehension, fluency, or related functions.

We argue for this carve out because holding a child back that is already struggling with the perceptions surrounding their delay, will only further compound the negative social-emotional impact. With an IEP in place, the student is already getting needed supports and the waiver process with a 20 hour summer reading program may not be the right option for that student’s identified needs.

Thanks for considering our comments, and feel free to contact us with follow up questions.

Sincerely,

Jessica and Dan DeBartolo

[REDACTED]

From: [Dominique Johnson](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: Public Comment: Alaska Reads Act
Date: Friday, March 3, 2023 2:16:55 PM

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Reads Act questions and/or suggestions from PK-12 Principals through the Alaska Council of School Administrators.

Please find below questions and suggestions for consideration by the Department of Education and Early Development and the State Board of Education.

Early Education

When will the program standards be available? Who will be reviewing all the programs and when do districts/programs need to apply?

It is our understanding that all of the things in the early education portion of the Reads Act has a total of \$3 million assigned to it, which we believe means it is an underfunded mandate and is not a great step toward universal preschool in Alaska.

Can school districts apply for the grant if they already have existing PreK programs? It says that schools won't qualify with programs also getting federal money but schools can qualify with a Head Start partnership, can you explain?

Does the .5 ADM start immediately in year 1? - Is this funding outside the \$3 million for PreK grants?

Parents as teachers- is this funded outside the \$3mil for PreK?

This is a 3 year cycle, will it open to new programs each year? (Will there be additional money each year?)

Do the preschool programs have to have a certified teacher leading them- many existing programs do not. What if you want a program but cannot find a teacher with an early childhood cert to be your lead teacher? They have 2 years to get their other required training hours?

The Act mentions that there needs to be mental health consultants to observe students and consult with teachers. Are these positions funded? If so, is it also within the \$3million?

District Reading Intervention

How was the new reading program selected?

Out of school support for low performing students- is this funded? Does it include all students? Who will staff this if teachers cannot work extra hours?

Is it required that parents attend the collaboration meetings for the improvement plans and if so, when will these meetings take place? If during the day, schools don't have subs or funding for subs and schools can't force teachers to stay after school repeatedly, even if we pay them. (IS IT FUNDED?)

Every child below reading level is supposed to have a parent meeting and if the parent doesn't show the district assigns a designee- the documentation that this will require is going to be a full time job for someone.

Immersion programs- how will language assessments and screeners be reviewed by DEED?

Waivers and other information for parents- will they be translated into the many languages spoken around the state?

Evidence of teacher proficiency with emphasis on culturally responsive approaches -

schools can't get staff now, these requirements need to have at least a 2 year timeline.

If a teacher or administrator does not pass the reading assessment within the allotted time, will they lose their job?

Department Reading Program

This part is voluntary. What funding is set aside for it and how many schools/districts do you see being able to support?

How many department reading specialists do you think will be needed and what funding is set aside for these positions?

How much is set aside for the reading intervention materials? (The act states DEED will purchase them.)

How does DEED plan to review all programs, support educators with PD, support educators with scheduled development, etc. How/who has all that time?

Who is assessing the fidelity of the reading intervention plans?

Are the reading specialists virtual? WHEN will these meetings take place? Again, taking teachers out of classrooms or requiring extra time.

Virtual Ed Consortium

How/who is going to manage this in addition to everything else. Are there other organizations (state or national) that offer virtual training that staff could choose from?

Thoughts/Suggestions

- There are concerns about the cost of doing this well and the effects it will have on teachers and staffing. Is there a way to delay the training requirements for staff by a year or 2? Educators have 2 years to complete the other required classes.
- There are also concerns with the amount of time the documentation and meetings will take, and if they will take teachers out of classrooms. Schools do not have quality subs in most areas to take over with fidelity and they will not be able to get it all done within the contract day. Some teachers are not willing to stay after or work in the summer even for pay.
- It is suggested that DEED is more transparent with the funding aspect of the Reads Act. While in Juneau recently, educators were asked repeatedly how much it would cost to implement. There is substantial cost involving all aspects of the Reads Act. Educators are not advocating for a higher BSA to fund the Reads Act. The two are distinct. School districts need additional funding to implement the Reads Act and school districts need inflation proofed increases inside the BSA. It would not be fair to

districts who want to implement all parts of the act but who also have great funding needs prior to adding the Reads Act to the plates of school districts.

Thank you for the opportunity to provide feedback. Thank you for your consideration.

Concern: District Reading Improvement Program

The text of the Alaska Reads Act includes a regulation that the Department of Education and Early Development should revisit considering data that suggests that the statewide literacy screener may not achieve its purpose: identifying students struggling to read and beginning intensive intervention as early as possible. The [research](#) shows that students who fail to read by age nine struggle in fourth-grade coursework and often never catch up to their peers, which makes identifying and beginning intervention quickly all the more urgent.

4 AAC 06.400 (b) states that “each school district shall assess all students in kindergarten through grade three each fall using the statewide screening tool as provided in AS 14.30.760.” Screening all K-3 students for reading deficiency in the fall of each year is good practice, as it is likely to identify students who had a reading deficiency at the end of the previous school year or lost progress during summer breaks. Students identified with a reading deficiency in the fall are given intensive reading interventions as required under 4 AAC 06.405 and must take winter and spring screenings to assess progress and measure growth.

However, 4 AAC 06.400 (b)(2) states that the initial fall assessment is also used to “identify students with sufficient reading skills, who are not required to take a winter or spring assessment.” This does not follow best practices established by states such as Mississippi and Florida, which have had astonishing success with their early literacy policies in part because they require screeners to [be administered](#) at least three times yearly. [Florida](#) requires screenings for K-2 students within “the first 30 instructional days of the school year (PM1), midyear (PM2), and within the last 30 days of the school year (PM3).” The Foundation for Excellence in Education, a national think-tank, [notes](#) that “Universal early literacy screeners should be administered three times per year with progress monitoring along the way for all K-3 students.”

All K-3 students should be administered the early literacy screener in the winter and spring, not only students identified with reading deficiencies on the fall screener. Tracking growth and regression remain important for students who may pass the screener in the fall but regress with a reading deficiency in the winter or spring. Students who are identified at any point — whether at the beginning, the middle, or the end of the school year — deserve to receive intensive intervention under 4 AAC 06.405 as early as practical after they are identified as reading deficient. Further, reporting requirements under 4 AAC 06.400 (c) should include the scores of all three yearly administrations of the literacy screener, not just the fall screener.

While many students will be identified through the required fall screener, the regulation as currently written risks allowing students to slip through the cracks if they begin to struggle within the school year, as districts are not required to administer winter and spring screenings to students who demonstrate sufficient reading skills on the fall screener.

The sources for the data cited above can be found at the end of this comment. Please consider what this research implies regarding the effectiveness of the Alaska Reads Act’s literacy screening provisions in achieving their purpose.

Sincerely,

Sarah Montalbano

Education Policy Analyst

Alaska Policy Forum

References

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American Federation of Teachers. “Waiting Rarely Works: Late Bloomers Usually Just Wilt.” *Reading Rockets*, Reading Rockets, <https://www.readingrockets.org/article/waiting-rarely-works-late-bloomers-usually-just-wilt>.

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“Comprehensive K-3 Reading Policy: Fundamental Principles.” *Foundation for Excellence in Education*, 2023, <https://excelined.org/wp-content/uploads/2020/11/ExcelinEd.PolicyToolkit.EarlyLiteracy.FundamentalPrinciples..pdf>.

From: [Barbara Marifern](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS ACT Advocacy
Date: Friday, March 3, 2023 2:50:22 PM

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Dear Deed Commissioner,

Our district is not afraid of accountability for our kids, and we all agree that reading by 3rd grade is important. I am concerned about the tight timelines for making this happen. The regulations will be voted on in April and must be in place by July 1, 2023. This is a nearly impossible timeline and will place incredible stress on our teachers and students. Finding highly qualified teachers is a challenge already, and these additional requirements are adding to this challenge. We have incredible teachers in Petersburg and they will do everything they can to meet the needs of our students, but there is a limit. I would ask that some of the timelines in this law be pushed back by one year to July 1, 2024. I would ask that districts have this year to pilot the new screening tool, new reading curriculum, and new individual reading plans. I would ask that you advocate for additional funding so districts can effectively implement the many requirements of the READS Act. This Act will require districts to hire more reading teachers and aides with no additional funding. It requires after school interventions and additional summer school. Where is the money coming from to do all of this? Please support our teachers and students by making next year a pilot year, and requiring full implementation by July 1, 2024.

Barb Marifern

--

Barb Marifern Integrated Special Education Teacher

[REDACTED]

From: [Cena Worhatch](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS Act Advocacy
Date: Friday, March 3, 2023 4:17:24 PM

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Our district is not afraid of accountability for our kids, and we all agree that reading by 3rd grade is important. I am concerned about the tight timelines for making this happen. The regulations will be voted on in April and must be in place by July 1, 2023. This is a nearly impossible timeline and will place incredible stress on our teachers and students. Finding highly qualified teachers is a challenge already, and these additional requirements are adding to this challenge. We have incredible teachers in Petersburg and they will do everything they can to meet the needs of our students, but there is a limit. I would ask that some of the timelines in this law be pushed back by one year to July 1, 2024. I would ask that districts have this year to pilot the new screening tool, new reading curriculum, and new individual reading plans. I would ask that you advocate for additional funding so districts can effectively implement the many requirements of the READS Act. This Act will require districts to hire more reading teachers and aides with no additional funding. It requires after school interventions and additional summer school. Where is the money coming from to do all of this? Please support our teachers and students by making next year a pilot year, and requiring full implementation by July 1, 2024.

Sincerely, Cena Worhatch
Parent and employee of Petersburg School District

From: [Ralph & Tammy Strickland](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS ACT Advocacy
Date: Friday, March 3, 2023 12:06:54 PM

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To whom it my concern,

Our Petersburg school district is not afraid of accountability for our kids, and we all agree that reading by 3rd grade is important. I am concerned about the tight timelines for making this happen. The regulations will be voted on in April and must be in place by July 1, 2023. This is a nearly impossible timeline and will place incredible stress on our teachers and students. Finding highly qualified teachers is a challenge already, and these additional requirements are adding to this challenge. We have incredible teachers in Petersburg and they will do everything they can to meet the needs of our students, but there is a limit. I would ask that some of the timelines in this law be pushed back by one year to July 1, 2024. I would ask that districts have this year to pilot the new screening tool, new reading curriculum, and new individual reading plans. I would ask that you advocate for additional funding so districts can effectively implement the many requirements of the READS Act. This Act will require districts to hire more reading teachers and aides with no additional funding. It requires after school interventions and additional summer school. Where is the money coming from to do all of this? Please support our teachers and students by making next year a pilot year, and requiring full implementation by July 1, 2024.

Thank you,
Tammy Strickland

From: [Lea Stanton Gregor](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS Act comments
Date: Friday, March 3, 2023 2:14:38 PM

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Hello,

We are writing today to express our concern for the timeline and lack of funding to adequately implement the READS Act by July 1, 2023. Without question, knowing how to read proficiently needs to be a top priority of educators. Unfortunately, with the proposed timeline, it is unlikely that this will give our students the best version of this program without adequate funding and staff support in place first.

School districts across the state are slowly recovering post the crisis of a pandemic. This seems like an incredible burden to place on teachers, support staff, and administration without data from a pilot year first. A pilot year would allow for time to create a more solid plan as to how to deliver the various facets of the READS Act, and hopefully time to obtain funding to make this happen.

We have amazing teachers here in Petersburg, and we're extremely concerned about the stress this would cause our educators, and students without gaining adequate funding to hire more staff to help implement this program. Please change the deadline for full implementation to July 1, 2024. Please spend this time advocating for additional funding so districts can effectively implement all that the READS Act requires.

Thank you for taking the time to read our comments.

Sincerely,

Lea and Jeigh Stanton Gregor

From: [Kacey Hammer](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS act
Date: Friday, March 3, 2023 10:15:39 AM

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To Whom it May Concern:

I am writing today out of concern for the READS Act. The ideas behind the READS act are sound but it needs more work.

The READS act requires more teachers and specialists but no additional time or resources are allocated to implement it. It sounds like a plan for failure.

It is my understanding is that reading proficiency will be compared to pre-Covid reading levels. Even with Herculean efforts by highly skilled teachers, kids have fallen behind. All kids need extra time to make up the losses. Calling these students deficient is unfair to the school and to the students. I would like to see adjustments in the plan that takes into account where the current student are at due to Covid. Education that focuses on penalizing schools and holding students back is not in keeping with the current understanding of what's best for the student and school.

Thank you for your time.

Kacey Hammer
Parent of 2 students in Petersburg's Stedman Elementary

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*Best wishes,
Kacey Hammer*

From: [Lisa Schramek](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS Act
Date: Friday, March 3, 2023 11:30:21 AM

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Thank you for taking public comments concerning the READS act. I am a certified teacher and have worked as a Title 1 reading specialist in Alaska. I currently have a child in kindergarten.

I know our district is not afraid of accountability for our kids and I have been part of many informal intervention actions including parents to help students succeed. Communication and flexibility have always been key. We all agree that reading by 3rd grade is vital to thriving in school and beyond. I am concerned about the tight timelines currently present in the READS Act and the inevitable consequences of forcing multiple requirements quickly with no grace period. As it stands, the regulations will be voted on in April and must be in place by July 1, 2023. This is a nearly impossible timeline and will place incredible stress on teachers, students, and families. Finding highly qualified teachers to strengthen the workforce is a challenge already and there is more turnover due to the events in recent years. We are lucky to have incredible teachers in Petersburg and I know they do everything they can to meet the needs of our students, but there is a limit. Adding formal pressures to provoke short term success could backfire and overall student achievement will suffer.

Please consider the following alterations:

- **Push back some of the timelines in this law by one year to July 1, 2024.**
- **Begin implementing the new requirements with a one year to pilot the new screening tool, new reading curriculum, and new individual reading plans.**
- **Advocate for additional funding so districts can effectively implement the many requirements of the READS Act.**

This Act as it stands, will require districts to hire more reading teachers and aides with no additional funding. It requires after school interventions and additional summer school. Where is the money coming from to do all of this?

Please support our teachers and students by making next year a pilot year and requiring full implementation by July 1, 2024.

Thank you,
Lisa Schramek

Lisa E. Schramek Adams



From: [Stephanie Payne](#)
To: [Commissioner, DEED \(EED sponsored\)](#)
Subject: READS Act
Date: Friday, March 3, 2023 12:59:46 PM

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Hello Sir,

I am hearing more and more about the constraints this is placing on our schools. As you likely know, finding qualified and any extra help in remote areas like ours is always a challenge, and with these new required teaching - there is even more strain. And such a short timeline makes it virtually impossible. Can any more time be given to help these schools (and all schools) acclimate to the new requirements?

It just seems like this is setting our schools, and therefore our children/families, up for failure. And in a big way. Our school faculty and staff are already feeling unfortunate and extreme funding deficiencies, why are we making it even harder for them to facilitate their passions in guiding our children?? Less and less funding, more stipulations and requirements...where does this end?

Aren't things hard enough for our schools? PLEASE help advocate for them, we should be helping, not hurting.

Thank you for your time and service!
Stephanie Payne, Petersburg AK

March 3, 2023

Dear Alaska State Board of Education,

thread is a private nonprofit that has been providing child care resource and referral services in Alaska for over 38 years. The organization assists thousands of families each year with free child care referrals, supports 3,000 early educators with professional development, and serves more than 430 licensed, community-based early childhood education programs providing services to young children. **thread** also houses & manages two quality systems to support early education programs and educators in Alaska - Learn & Grow and Alaska SEED.

For the past several months, **thread** staff have been working with DEED, providing expertise to inform the development of the standards and regulations for the Early Education Grant Program component of the Alaska Reads Act. Our staff members have participated on the standards work group, provided public comment on the draft regulations, and been involved in panel discussions about the Early Education Grant Program. **thread** appreciates the collaborative nature of the work and the positive interactions with DEED staff related to these efforts.

As Alaska moves forward with the expansion of publicly funded pre-kindergarten, **thread** believes it is critical that all policies, regulations, and standards be developed from an early childhood education mixed-delivery perspective. Mixed-delivery means that publicly funded pre-kindergarten services are provided within public school settings as well as community child care settings, including Head Start, military and tribal child care providers, and other licensed, high-quality child care settings. There are many benefits to a mixed-delivery system, including providing parents options for how they will access publicly funded pre-kindergarten services.

Mixed delivery is not a trend, but is considered best practice within the design of publicly-funded pre-kindergarten systems. Across the country, state and local communities are using mixed-delivery as the foundation for their pre-kindergarten systems to leverage existing early childhood expertise and align all early childhood education programs. Additionally, the [Alaska Early Childhood Strategic Direction](#), which was adopted by DEED, includes the strategy of aligning “policies, standards, and regulations across all sectors and settings” as part of a coordinated early childhood plan. **thread** encourages and supports policies and regulations that align with the goals identified in the Alaska Early Childhood Strategic Direction.

Our analysis of the Alaska Reads regulations for the Early Education Grant Program indicates that the design of Alaska’s publicly funded pre-kindergarten program is not supportive of a mixed-delivery model of early childhood education. Licensed child care providers are not specifically included in the outreach efforts required as part of the application process (4 ACC 60.200(a)(5)), nor are they allowed the opportunity to partner with school districts to provide pre-kindergarten services within their already existing programs (4 ACC 60.200(e)).

Additionally, certain aspects of child care programs - lack of sufficient enrollment (4 ACC 60.200(b)(4)) or being duplicative of a pre-kindergarten program (4 ACC 60.200(b)(5)) - could serve to limit a school district's ability to receive an early education grant. As currently written, we are concerned these regulations may have unintended consequences that could limit parents' access to publicly funded pre-kindergarten in Alaska's communities.

States and communities across the country provide examples of successfully integrating publicly funded pre-kindergarten into communities while supporting currently existing early childhood education opportunities and allowing parents a choice in how they access publicly funded pre-kindergarten services. For example, [Georgia's mixed-delivery model](#) allows for state-funded pre-kindergarten to be provided at public schools, private child-care centers, faith-based organizations, Head Start agencies, state colleges and universities, and military facilities. In both [West Virginia](#) and [North Carolina](#) they use a community/county-level collaboration to ensure mixed-delivery of publicly funded pre-kindergarten within their communities. Additional information on the benefits of mixed-delivery within early childhood systems and policy strategies that support it can be found in our [mixed-delivery policy brief](#).

A mixed-delivery model supports partnership with community child care providers. It begins with consultation to gain a clear picture of how publicly funded pre-kindergarten can best support the community, but extends to the inclusion of community-based child care providers within the publicly funded pre-kindergarten model. As you consider the regulations for the Early Education Grant Program of the Alaska Reads Act, **thread** encourages the Board to pursue strategies that expand and strengthen mixed-delivery and support the alignment of all early childhood education efforts within Alaska. Our organization remains a resource to you on this issue. If you have any questions or need further information, please feel free to contact me at 907.265.3101 or sberglund@threadalaska.org. Thank you for your service to Alaska's children.

Sincerely,



Stephanie Berglund
CEO

EDUCATION

ETHICS

HEALTH & SOCIAL SERVICES

JUDICIARY

TRANSPORTATION

ALASKA STATE LEGISLATURE



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SENATOR Löki Gale Tobin

Education Committee Chair

My comments on the proposed regulations for the implementation of the Alaska Reads Act are intended to reconcile the regulations with the intent of the Alaska State Legislature. While I am currently a member of the Alaska State Senate, I previously served as staff for Senator Tom Begich in the 31st and 32nd Alaska State Legislatures. In 2019, Senator Begich was approached by Governor Dunleavy and Alaska Department of Education and Early Development (DEED) Commissioner Michael Johnson about combining Senator Begich’s legislation to expand and support universal pre-Kindergarten with early reading intervention. The early conversation, which I was privileged to be a part of, led to the formation of the “Alaska Reads Act.”

During the winter of 2019-2020, I worked with DEED staff to draft the legislation, honoring the intent of Governor Dunleavy, Commissioner Johnson, and Senator Begich. The Alaska Reads Act was introduced as a sponsor substitute for Senate Bill 6 with Senator Begich being the primary bill sponsor. Over the next several years, I was the lead staff tasked with shepherding the “Alaska Reads Act” through the legislative process. I am proud of my efforts to help guide the Act from an idea into state law. Hopefully, I can offer some insight to better inform the regulations for the Act.

First, I want to congratulate the staff of the Alaska Department of Education and Early Development (DEED) on the draft regulations for the Alaska Reads Act. They feature several measures that will make it easier for DEED and school districts across to implement the Act. Additionally, the draft regulations are largely aligned with the intent of the Alaska State Legislature, with a few exceptions that I will detail in my public comments.

The most obvious exception involves the regulations surrounding the reading specialist employed by DEED. During the initial bill discussions and subsequent on-record testimony, the reading specialists were described as being assigned to eligible schools and were to reside in community. This intent is captured by Fiscal

Note OMB: 2796. The fiscal note reads, “Reading Specialists would be located in communities across the state and would need to be provided a geographic cost differential, which is not included in this estimate.” The fiscal note goes on to describe the training, supplies, and equipment costs included in the fiscal note for each position.

Unfortunately, the draft regulations stipulate that the reading specialists shall deliver support in a distance-delivery model with at least one annual site visit. Removing the requirement that reading specialists live and work within the school district they serve will make it more challenging for them to implement intensive reading services in low performing schools. The legislative intent of the Alaska Reads Act was for the specialists to work regularly with students as a class, in small groups, or individually. Achieving that intent will be challenging if the specialist can only participate via an online platform. I recognize there may be limitations to scaling up this program and meeting legislative intent, thus, my recommendation is to strike, “shall” and replace it with “may.” Additionally, I recommend the regulations encompass the intent of the department to honor legislative intent and identify an appropriate timeline.

On pages 37-38, department reading specialists are meant to provide an annual update to the community on the department reading program. How is this work imagined to be done remotely and in a culturally responsive manner?

On page 38, lines 3-5, department reading specialists are directed to work with community, parents, families of students, etc. How is this work imagined to be done remotely and in a culturally responsive manner?

On page 39, lines 8-11, department reading specialists are required to meet coursework requirements in Indigenous language learning and culturally responsive education and the standards are to be established in regulation by indigenous language stakeholders. Where are these regulations?

Thank you for considering these public comments.