I congratulate the teams of teachers and others who have worked relentlessly to revise the current TEKS for English Language Arts and Reading and present a final draft of the proposed revisions. The process has resulted in favorable improvements to address many of the initial concerns, including the need to streamline and align, while also ensuring that content is covered in a way that supports the goal for all students to achieve reading proficiency and high levels of literacy and to become college and career ready as a function of receiving an education in Texas schools. The revision process also addressed a need for teachers to be able to use the TEKS in ways that guide and support their instruction. While many of the goals appear to have been accomplished through this process, the last point in which teachers need to use the TEKS to guide and support instruction is an area that most of my comments and suggestions address.

Thank you for the opportunity to engage in this important task.

1. Does each grade level or course follow a complete and logical development of English language arts and reading concepts?
   - See notes below that may pertain to this question. While each strand addresses a standard and the student expectations that represent a logical progression of skill development, it is sometimes difficult to determine if all are complete given the lack of differentiation between grade levels and the general nature of some of them.

2. Have the correct vocabulary and terminology been used throughout the TEKS?
   - If Texas is transitioning to the use of English Learners (ELs) instead of English Language Learners (ELLs), all the standards and supporting documents will need to be adjusted.
   - There are still a few instances of some verbs that are used that are not discernible from one grade to the next. For example, some student expectations for standards across Grades 6-8 and English I-IV differ only by one word (evaluate, analyze, etc.).

3. Is the level of rigor appropriate for each grade level?
   - Yes, for the most part. There may be a few student expectations that will be more difficult to accomplish than others (e.g., 2G, 2H, 2I in Kindergarten). It is important that the standards for any one grade level allow teachers to address a wide range of student abilities without compromising the likelihood that all students would be able to meet all the standards within a grade level.

4. Are the student expectations (SEs) clear and specific?

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Some are specific, while many are not. Specificity is lost especially when transitioning from one grade level to the next for some strands (see comments at end).

The specificity and inclusion of syntax are good examples of how this information can support teachers’ abilities to use the standards as a guide for teaching specific content. Similarly, the content for foundational skills for phonological awareness and applying phonetic knowledge.

Oral language lacks specificity (see additional note in another section).

5. Are the TEKS aligned horizontally and vertically? If not, what gaps should be addressed?

6. Can all student expectations reasonably be taught within the amount of time typically allotted for the grade level or high school course prior to the end of the school year or prior to a state assessment?

- It’s difficult to determine the response to this question for some grade levels given the generality of how some are written.
- Even though listening, speaking, reading, and writing are embedded within the description of each strand, which may lead to reliance on one more than the other depending on the assessment (e.g., inquiry and research or composition as these lean heavily on writing, especially composition. Response embeds speaking and writing well). If a strand does not adequately address all four processes, should they all be included? For example, should composition include only listening, reading and writing?

7. Are there student expectations that can be eliminated in order to streamline the standards?

- Standards have been streamlined, which is evident by the number of standards and student expectations, but some are at the risk of not including sufficient information to guide teachers in achieving the standard or knowing specific content to teach at each grade level.

8. Are there specific areas that need to be updated to reflect current research?

- Perhaps the grouping of vowel sounds by sound and paired with common spellings at different grade levels should be reconsidered (e.g., Moats 2009, 2010).
- The use of “unsupported independent reading” is not supported empirically for the development of skills (e.g., Duke 2016).

9. Are the College and Career Readiness Standards adequately and appropriately addressed throughout the TEKS?

- Yes, however, there are a few as previously noted and discussed in comments that address the CCRS of listening, reading, speaking, and writing inconsistently or generally so it may be unclear if teachers will need to teach and perhaps assess them in more than one way (e.g., speaking and writing).
10. Do you have any other suggestions for the English language arts and reading TEKS for the SBOE to consider?

- The lack of differentiation across all secondary grades (including some within grades 6-8) warrants attention. Teachers may not be able to determine what students should be able to do by the end of English I, II, III, and IV for nearly all standards without additional guidance from examples of texts, specific sub-skills identified, or something else that would differentiate one grade level to the next. At a minimum, there should be some variation between English I-II and English III-IV (as is the case with current TEKS and standards adopted elsewhere). If they are to remain the same across these grade levels and for all standards, one might ask the question: Why present them by grade level in high school when it is clear to teachers that they are not different as written. Possible solutions or suggestions include:
  - Differentiate by time periods or suggested authors.
  - Provide specificity regarding a pre-defined set of Latin and Greek roots that students are expected to learn at a minimum across grade levels through English I-IV (focus on morphology and etymology to understand meaning, usage, and spelling). These were included in the current TEKS and should remain explicitly to ensure that students learn them in a systematic way. They are included in the draft of Grades 6-8 and it is unclear why they would not also be included for English I-IV when the need to learn and access this knowledge is high as students prepare for college and career.
  - Provide specific details about the purposes of using oral language (i.e., functions as in argument, persuasion, description, debate, narration, information, etc.) at various grade levels and including examples of the forms of language that relate to each (e.g., vocabulary and syntactic structures). This is an area that requires a level of teacher knowledge that may not have been part of teacher preparation programs and thus, if the content is unspecified in standards, teachers may need to rely heavily on curriculum to teach the content for achieving a standard).
  - Provide samples of texts that help teachers understand the increasing complexity that is inherently part of the standards progression across grade levels.

- I agree that we should keep decoding and encoding together as they are reciprocal processes to learn and teach. I suggest that we do include the specific skills to be taught in the early grades as this is often an area that poses difficulty for new teachers or those who may not be as grounded in the research-based recommendations as is needed to teach these skills effectively. The reliance on core (basal) programs to understand the sequence and how to supplement with additional practice may be insufficient for teachers to know what to teach next. The following is a list of specific recommendations or edits:
  - K-1Cii. Even though adjacent consonants especially in the final position (CVCC) may be more challenging to encode than decode, both decoding and encoding should be paired as reciprocal skills as is described in the introduction OR a rationale should be included for teachers to understand why they wouldn’t teach them together
across all examples. If K students are decoding CCVC and CVCC, then they should also be learning how to encode them.

- Grade 1-B(i) Delete. Students will be doing this in K (see K-Bi). By first grade, the primary instructional emphasis needs to be placed at the onset/rime, syllable, and phoneme levels.
- Grade 1-C(iv and v). Need examples here. It should not be assumed that all teachers know the definition of a closed or open syllable even though they teach them. Examples would ensure that teachers know how to supplement examples if programs don’t provide them or students need more of them. Same is true for Grade 2-B(iii and iv). With multi-syllable words, teachers may think that all syllables may need to have closed or open (picnic or fragment vs. silent or apron). Same is also true for other syllable-type student expectations—examples are needed.
- Decoding and encoding most common sounds of all consonants should be a K SE, not Grade 1.
- Group long and variant vowel sounds by sounds and pair with common spellings by grade level. For example, of the 10 or more spellings for the long a sound, the spellings for grade 1 may include _VCe as in “make” or “grape,” ‘ai’ as in rain, mail, ‘ay’ as in play or ray, or ‘eigh’ as in eight or weigh. Additional spellings for long a (open syllable as in apron, radar; ‘et’ as in multi-syllable words of French origin as in ballet, buffet, chalet; or ‘ey’ as in prey, whey, they; ‘ea’ as in great) would be taught at 2nd and 3rd grade levels. This approach can be considered for all vowel sounds. When we think about how many vowels exist in our language, we need to think in terms of sound (there are 18 vowel sounds) and all the ways they are represented rather than the spellings first which encourages learning a spelling first.
- Add “and taught” to student expectations that indicate students will “respond using newly acquired vocabulary as appropriate” to ensure that teachers will encourage students to use vocabulary that is taught explicitly, but also implicitly through wide reading (e.g., 3E)

- The recommendation to include lists of text titles to span genres, time periods, and cultures has not been addressed in this draft. Teachers will benefit greatly from a list and students will be assured of reading a variety of complex texts that build background knowledge and further prepare them for the literacy demands for college and/or career. This is especially important at the secondary level. Teachers, students, and parents should have an idea of when students will experience Dickens, Chaucer, Shakespeare, Austen, Hemingway, Walker, Dickenson, Fitzgerald, Lee, O’Brien, Angelou, Irving, Miller, Homer, Terkel, Thoreau, Wharton, Bradbury, Poe, Steinbeck, Ellison, Melville, Bronte, Smith, Sinclair, Emerson, Whitman, Twain, etc. as examples. Explicit reference to works throughout secondary years ensures that students’ background knowledge and application of skills is built systematically.

- As a teacher, I would be less than sure about what to teach across English I-IV and I would have less certainty about how to draw upon students’ prior learning in English I, II, or III if I were teaching English IV. I would feel a greater dependency on curriculum to identify content to teach as well as district and campus
leadership to set the scope and sequence across these levels (some of this also applies to Grades 6-8 and in fact, some standards for Grade 8 are identical to English I-IV or differ minimally). As a teacher, if I struggled learning Shakespeare, for example, it is unlikely I would choose to teach it if the standards allow this freedom and latitude. This can be said for any one author, genre, or time period in which classical works are set.

- With less specificity, as a district or campus leader, I would feel pressure to provide necessary support and allocate resources for teachers to be able to provide instruction and cover content that prepares students for college and career. I would be concerned that teachers are less than prepared to understand what to teach in one specific grade level if they are expected to use the standards as a guide (e.g., develop oral language under Strand 1; compare sources within and across genres, etc.).

- In conversations across recent years with my Texas colleagues about standards, a common message was clear: Texas doesn’t need to adopt a common set of standards because we feel our standards are either better or are in good shape. This has certainly been true. One needs to ask the question: Are the proposed standards still superior to a common set and to the current TEKS adopted in 2009? If so, how? Educators and state officials may need to be prepared to articulate a thoughtful, research-informed response to this question. If the drafted standards are adopted, teachers may become more curriculum dependent and districts, schools, and service centers more “resource-depleted.” In general, we have compromised a level of specificity that may require teachers to rely on curriculum to teach more than they have had to rely on in the past, while districts may be faced with providing professional learning experiences that exceed current budgets and time allocated for professional development. This strain may spill over into the education service centers as well as individual campuses. It may create the need for most campuses to employ or have access to curriculum specialists to determine how best to implement some of the standards that are general or lack differentiation across grade levels. The current standards provided a bit more differentiation than the proposed ones (e.g., see Research, Listening and Speaking, Oral and Written Conventions, Reading Comprehension of Literary Text/Fiction, etc. However, Fig. 19 included little to no differentiation). At times, the inclusion of examples is enough to differentiate and ultimately support teachers.

- As with any standards revision, there is impact on both curriculum and instructional approaches as well as assessment. These standards will drive this impact. With increasing attention on the need to align standards, curricular and instructional approaches, and assessment, these are important considerations. General standards may make it easier on curriculum and instruction and assessment because content may be “loose” (or general and undifferentiated) so what follows will fit whether it’s general or specific and this potentially disrupts alignment.

- The attention to all four processes: listening, speaking, reading, writing, is inconsistent across all standards. For example, for Standard 8, Inquiry and Research, it is unclear which student expectations will be taught and measured
with writing. Similarly, it is possible that all student expectations are implemented for writing only as many are open to interpretation.

- When will students be taught to understand etymology and apply that knowledge for building vocabulary knowledge (and spelling) and thus, determine meaning of unknown words and demonstrate comprehension? It is unclear that this is addressed across grade levels. While morphology is included generally, the specific emphasis on understanding word origins and the importance of this understanding is lacking.

- I continue to have concern with the student expectation, “Self-select text and read independently for a sustained period of time” under Standard 1: Developing and Sustaining Foundational Language Skills (F in K, G in Grade 1, F in Grades 2 and 3, E in Grade 4, A in Grade 5, D in Grades 6, 7, 8, and A in English I, II, III, and IV). “Unsupported independent reading” or practices associated with it (Silent sustained reading, DEAR-Drop Everything and Read time, etc.) are not validated, evidence-based reading instructional practices. As recently as June 2016, Nell Duke, a notable reading researcher identified this practice among five that should be abandoned in classrooms. While this is an important goal for all students and should be maintained, instructional time in classrooms should be devoted to supporting students’ skill development. Choice can certainly be part of that as well as instructional practices that help students comprehend and respond to text selected. The wording of this standard may suggest that teachers are allowed to devote an unspecified amount of instructional time having students engaged in silent reading when they may not have the assurance that students are selecting appropriate text to advance their skills and that they are actually able to read the text for the intended outcomes. Practice opportunities are what allow students to move through all phases of learning (acquisition, fluency, maintenance, and generalization) to further develop skills, but for students to benefit from practice as in independent practice, we must consider the features of effective instruction when the emphasis is on instruction or practice with feedback leading up to independent practice. The student expectation, as written, places no emphasis on the instructional aspect or responsibility of the teacher to support the students. If I wear my teacher’s lens, I read this strategy and ask myself, “How will I actually use instructional time to teach students how to ‘self-select text and read independently . . .’” I would find myself striving to achieve this goal through the implementation of instructional practices and providing choices for topics, texts, and responses to ensure that skills are addressed adequately to support the integration of listening, reading, writing, and speaking. The inclusion of this student expectation does little to inform what I should do to get there, while the other skill-related standards and student expectations do (although some lack specificity at each grade level). Independent reading time in classrooms must include instruction or be integrated explicitly with oral and written language opportunities (as in “produce evidence of reading” or respond to reading to demonstrate understanding). Therefore, I recommend removing this as a student expectation for Standard 1. Again, this is based on the understanding that teachers will teach students the skills and knowledge they need to become motivated, independent readers.
While the current TEKS needed revision and streamlining, the draft TEKS have omitted some specific content. Specifically, when will the following skills be addressed:

- Final stable syllables? None before Grade 2?
- Name persons and objects and categorize them for K?
- Specific characteristics and types of literary text (e.g., fables, folktales, repetitive phrases and purposes for beginning and transitions within text, etc.)?
- Are digital media or literacy elements captured sufficiently?
- Are there specific works or texts that should be part of a list for grades 3-5, 6-8, and Eng I-IV (addressed in other comments)

Thank you!

Respectfully submitted,

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