



Submission from Dyslexia Evidence Based (DEB) on Draft LLA Literacy Policy White Paper

28 February 2024

DEB fully supports the intent of this White Paper because the education system has been open and go choose your own adventure for more than 20 years. The decisions, or lack thereof, have been the downfall of our children in New Zealand. The NCEA and PISA results support my statement and changes need to be made and mandated to ensure all children are given the right to read, especially in the world we live in today that is surrounded with words.

I would like to acknowledge that DEB has been advocating for this change for four years and I would encourage the new Minister of Education to learn from the mistakes of her predecessors from both parties over the years.

The Ministry has blindly trusted all New Zealand home grown academics, professors and researchers with New Zealand degrees just because they are from New Zealand and not because they were the best people to make the decisions for our nation's education system.

This has been to our detriment. It is why New Zealand stopped using a teacher led approach and stopped teaching phonics in favour of a Whole Language approach. These same academics also created Reading Recovery and became education advisors to the Ministry and still are today. The same academics also pushed for teaching training to be moved from practical, hands-on training courses at college run by teachers to professors at University who have never taught in a classroom environment or taught a child how to read. Many of these professors only know their research but have no practice in day to day teaching which is where the problems arise in the classrooms.

I would like to thank and acknowledge our New Zealand academics and researchers for the valuable work they do and have done. That said, it is vital for those people who are qualified and have years of hands-on experience teaching children using a structured literacy approach in New Zealand and internationally to be given a seat at the table when key decisions like this are being made.

This makes sure that decisions being made around PLD, funding and resources are suitable for all learners including our tier 3 children who may have Dyslexia, Development Language disorder, Intellectual Disability , Global Delays, Autism, ADHD, to name just a few. It will also bring knowledge and

understanding of the challenges of implementing structured literacy in a classroom, small group or in a one to one setting.

Decisions should not be made by people just because they are employed by the Ministry of Education, work in a New Zealand University or they have a degree or letters after their name. This has been the mistake of your predecessors. Universities have too much financial interest in their programmes to be objective about their programmes. The programmes NZ Universities create should be reviewed by international experts and not be reviewed by their colleagues within New Zealand.

An example of this is the Better Start programme which was rolled out and funded without the proper due diligence. This programme wasn't complete and they did not listen to feedback provided from the participants of the first trial.

Any Ministry funded programme should have complete research and data available before a nationwide release is done. Better Start was not a complete programme when it was released.

The Ministry should also be collecting data on why and how many schools have chosen not to continue using Better Start after the initial training. I can confirm neither the Ministry nor the Better Start Programme creators have this information. Which again confirms the need for the data and research to be completed and reviewed before millions of taxpayers money is spent on a programme that was released for Year one children ONLY and Tier 1 and Tier 2 two children only. It excluded Tier 3 children and was not an inclusive approach to literacy.

If the Ministry and Better Start had allowed qualified, outside advisors who are trained in a structured literacy approach to review and provide feedback. We would now have a schoolwide programme for years 1-8 for Tier 1,2 and 3 that was evidence based and followed the science of reading and structured Literacy. I would like to note many, including myself, offered feedback and help but were refused.

Who we are

[Deb \(Dyslexia Evidence Based\)](#) is a support group for individuals interested in evidence-based support for people with dyslexia. Founded in 2019, Deb started as a Facebook Group. The community reached over 9,500 members and now includes a website and a Facebook page . We consist of parents and educators with a passion for providing evidence-based literacy instruction called a structured literacy approach for students facing learning difficulties.

Our work to date.

- Provided a FREE reliable and safe supportive platform for the teachers, educators , speech language therapists and parents to learn and engage with each other about evidence based practice and structured literacy and how parents and teachers could start thinking about how to implement it.
- The platform also provides information on IEP plans for your students or your child , what technology accommodations should you ask for, what were and what were not evidence based programmes being used in learning support and how best to help children in tier 3

- Provide a FREE website with information on the science of reading and learning, structured literacy, dyslexia, DLD, dyscalculia, mild intellectual disability as well as resources, research, recommendations and much more.
- Working with Lifting Literacy Aotearoa as a founding member in the beginning, moving to a supportive role over the years.
- Requesting a review, update and the removal of non evidence based practices and companies on the dyslexia section of the Ministry's website.
- Advising the Ministry on the correct resources and information for the new dyslexia kete
- Being part of the review team for the Dyslexia Kete document only.
- Providing the ministry feedback on the resources that were listed versus what was recommended.
- Providing the Ministry feedback on the release of the first phonics plus books and how they were not suitable for dyslexic children.
- Provided the Ministry feedback and requested the removal of Reading Recovery and Reading Recovery ELS.
- Requested the Ombudsman investigate Reading Recovery and the Ministry contracts .
- Provided feedback over the years and correcting misinformation stated by the Better Start programme.
- Continuously advocating for clarification on the Better Start programme and its lack of transparency and lack of inclusion for tier 3 children in schools years 1-8
- Advocated for specific funding for dyslexic students and the term to be defined by the Ministry.

General comments

Sharon Scurr is submitting the following comments on behalf of DEB.

Policy Objectives

The DEB supports all the proposals included in the white paper because we are in a literacy crisis and we are failing all our children with the education we are providing them in New Zealand. If we do not provide and fund high quality training and knowledge of an evidence based approach to literacy called structured literacy then we are letting this generation of children down and the next generations to come.

It is important to acknowledge the Science of Reading is not fixed but we have enough evidence and research to support the change. The Minister of Education should endeavour to stay up to date with the science and practice, making sure they are providing the teachers the knowledge, training, and resources, as well as the funding, to lift New Zealand's literacy levels for all children. This is the job of the Ministry of Education, it should not be burdened on individuals, schools, teachers or parents.

I would like to highlight a few issues that need more attention:

Question 1: *Do you agree with the objectives for literacy policy we have set out? Why or why not? Would you change or add anything?*

Stated Yes and answered above

Question 2: *Do you have any comments on the description of Structured Literacy as articulated by the IDA? The principles, instructional content and the Knowledge and Practice Standards?*

I would like to address some of the misinformation regarding the description of structured literacy and Knowledge Practice Standards (KPSs) by the IDA and the association to the Orton Gillingham approach and programmes.

The first thing that needs to be addressed is an approach vs a programme.

Readymade Programme

A programme is something that you buy and then you follow a step-by-step process. You don't need to do training and if you do it is specific to the programme and its material. It is normally scripted each day for mainstream classroom teaching (tier 1). All the material is designed to be followed in order and you can't change the scope and sequence. As programme developers can create and call themselves a structured literacy or Orton Gillingham without being officially trained in any of the approaches, you will get different programmes teaching some of, or only one of, the elements described in the IDA's framework of Structured literacy or the KPSs. You also get developers of programmes adding elements they like or removing elements they don't.

An off-the-shelf programme may only include a reading component or spelling component but it is sold as structured literacy or Orton Gillingham

A full Structured Literacy Programme should incorporate reading and spelling but we know this is not the case in many countries and where research has been done.

In my experience at looking at many programmes over the years a structured literacy programme should include

- Scripted lessons telling you what and how to teach the **6 components; Phonology, Sound to Symbol and Symbol to Sound, Syllables, Morphology and Syntax.**
- Lesson plans that are Systematic and Cumulative, Explicit and Diagnostic.
- A logical scope and sequence.
- All the material that you will need to teach the programme which may include teacher manual with scripted lesson plans, information on the spelling concepts and the 6 syllable types, word cards, sound cards, vocabulary cards, worksheets, decodable books, fluency sheets, dictation sentences, a phonological awareness manual or exercises that are built into the lesson depending on the grade.

Training in an approach

Training in an approach (5-day course and the 12-month practicum that qualifies you to apply for your accreditation) gives you the following skills, all of which allow you to implement a structured literacy approach successfully:

- The understanding it takes at least 2 years to fully understand all aspects of the journey/approach.
- The knowledge and understanding of the 6 components that must be included in a Structured Literacy approach: Phonology, Sound to Symbol and Symbol to Sound, Syllable types, Morphology, Syntax and Semantics, as well as knowing how to implement them using the 3 principles of a Structured Literacy approach: Systematic and Cumulative, Explicit, and Diagnostic.
- The knowledge to be able to create a logical scope and sequence that suits your learner/s.
- The knowledge to change your scope and sequence if required.
- The knowledge to create your own materials and resources.
- The knowledge to understand what, why and how to teach your student.
- The ability to be able to spot snake oils.
- An understanding of the steps before and the steps after.
- The ability to assess through observation as well as in assessments (diagnostic).
- The knowledge to pull the right information from other assessments.
- The knowledge required to teach handwriting and the importance of it.
- Having the knowledge to teach the alphabetic code and the spelling patterns.
- The knowledge to know what the 6 syllable types and what ones to teach.
- The knowledge to teach Phonological Awareness (mainly Phonemic Awareness).
- The knowledge to teach basic morphology as part of the alphabetic code.
- The knowledge to teach writing.
- The knowledge to be able to successfully teach dyslexic children.
- The knowledge and understanding of the role oral language plays in structured literacy.

A Structured Literacy approach is about the training, the knowledge you gain over time and how to use it.

Orton Gillingham training, and especially OG programmes, have been changed over the years and many have been diluted by commercialism. For that reason it should not be referenced as a Structured Literacy approach or programme that has now been defined by the framework and KPS's from the IDA.

There is quite a difference between an approach and a programme which means it is important you understand all variables when you look at research. It is important to ask did the researchers compare the training provided to those who participated in the research ie PLD facilitators vs institutes, did they ask what OG or SL programme it is or presume they are the same, did they check what each programme included and how each programme interpreted the components and principles, did they have the same amount of teachers and children in tier 1,2, and 3.

The short answer is NO because no one has done this to date. This is why it is crucial the Minister and the Ministry understand what an approach is and what a programme is, and that research doesn't tell the full story.

Note: it is important to note Systematic Synthetic Phonics is an evidence based approach to teaching the alphabetic principle. It is ONLY ONE component of a structured literacy approach and must not be confused as Structured Literacy - this is happening in New Zealand and overseas due to lack of knowledge and training. This is why DEB supports the framework and the KPS's for Structured Literacy - without it we will have another choose your own adventure and nothing to support, guide or make providers, tutors and teachers accountable.

Question 3: *Do you agree that Structured Literacy needs to be a regulatory requirement (i.e mandated) in all schools? Why or why not?*

I have explained my answer in question 2 but I will also add-

Structured literacy must be mandated in schools to ensure all children are treated equally and are given the same opportunities to learn and receive a high quality education that comes with high quality resources regardless of their postcode. To date many parents have been enabling the Ministry to get away with not funding dyslexic children because parents have had to pay for tutors. Parents send their children to school to learn to read. They should not be expected to fund this cost.

Question 4: *What do you think of our proposal that the Ministry of Education appoint an independent panel of science of reading and evidence-based teaching practices to convene every six months to review submissions made to it for updates to curriculum, common practice model, PLD accreditation criteria or teaching resources? Do you have other ideas of how this could work?*

I agree that accountability is needed and is the responsibility of the Ministry to make sure an independent panel of advisors are employed who have a range of the correct qualifications in structured literacy as well as teaching PLD and teaching children in a tier 1,2 and 3 setting. This responsibility should not be left to independent boards and schools. This panel should not solely be made up of academics/university professors.

Question 6: *What feedback do you have on the draft Common Practice Model?*

The CPM was too vague and could be misinterpreted to suit the status quo and not move with the science and evidence.

Question 7: *Do you agree that an independent group of science of reading and structured literacy experts (possibly with representation from overseas) be appointed to review the refreshed English Curriculum and Common Practice Model and report back with any recommended changes by 31 March 2024? If not, what would you suggest?*

Yes I agree with the statement and welcome the support of international experts providing feedback and keeping the Ministry of Education accountable.

Teacher professional development and change management support

Question 10: *How do you envisage an accreditation scheme for structured literacy PLD providers could be designed? What are the key considerations that need to be taken into account and how might these be overcome?*

The panel who are being asked to design this scheme must have completed a structured literacy 5 day course with a 12 month accreditation to be able to understand what is involved in the training and accreditation.

Question 11: *What are your thoughts on the role of LSC, RTLB, Rtlits and potentially Reading Recovery Teachers in supporting and leading schools' transition to a structured literacy approach and ongoing coaching support?*

Consolidate the funding from the learning support teachers (Reading Recovery, RTLB, RtLiT, and LSC's) and provide an accredited qualification in training using a Structured Literacy approach, as well as training in understanding Neurodiversity affirming practices in teaching and in using Enabling Good Life Principles. Allowing all schools to have their own fully qualified funded specialist teacher in house.

Initial Teacher Education (ITE) and Teaching Standards

Question 12: *Do you have comments on how ITE providers could be made to embed the science of reading and structured literacy pedagogy into their teacher training programmes?*

Anyone who is training teachers must complete a 5 day training course with a 12 month accreditation allowing them to have the knowledge of teaching Structured Literacy school wide in a mainstream tier 1 setting, tier 2 group setting and and one to one tier 3 setting.

To date I would recommend the IMSLE and Learning Matters courses for accreditation.

Assessment

Question 15: *What are your thoughts on curriculum based assessment tools for literacy?*

The curriculum needs to provide more details in what to teach each year and remove levels and phases to allow better assessment measures to be put in place year to year.

Intervention

Question 16: *Do you agree that the Ministry of Education should not extend the Reading Recovery and Early Literacy Support (RR&ELS) contract for 2024? Do you have comments on our proposed transitional arrangements?*

DEB agrees with the section 5.126 -131 regarding Reading Recovery, Reading Recovery and ELS. These contracts should not be re-signed. It is important as I have stated in my opening statement for any University programme, but especially for Reading Recovery, that the Minister and Ministry have outside advisors when making decisions. They must not be tied to any New Zealand Universities who are financially connected or academically connected to programmes created or being used in New Zealand Universities.

This is the reason why the New Zealand Education system has kept funding an outdated programme costing taxpayers millions dollars each year for an intervention when all the international research states it does not work and it does not follow the science of reading or a structured literacy approach which the Ministry itself recommends for Dyslexic children.

Question 17: *What do you think about our proposal for a hybrid model of reading intervention support in schools? What would you add or change?*

I believe a hybrid model is crucial to support children with dyslexia. Each school needs access to a qualified structured literacy specialist who has completed training that includes a tier 3 model and understands the challenges young and especially older children with dyslexia have if they have not been taught to read.

It has been clear that the funding has not been allocated to literacy in the same way as it has to other resources when we know if you can't read it leads to behaviour and mental health issues.

As stated in the policy under Education Sector by Numbers the Ministry only funds 109 Resource Literacy teachers for 1942 schools nationwide. They also provide 272 Reading Recovery Teachers for Year 2 students ONLY for a short intervention period that doesn't work. Incredibly there are 1001 Resource Behaviour teachers and 623 LSC support coordinators. This adds up to 2005 support teachers all teaching different things and different programmes and have not received any training on Dyslexia or how to teach a dyslexic child.

All 2005 teachers should be retrained and be working as one unit, not separate entities. They should all complete a 5 days training with a 12 month accreditation on how to teach a structured literacy approach. Then all 2005 teachers will have the knowledge to support all tier 3 students with reading , writing and spelling . This will allow them to work with teachers and the lessons being taught in the classroom especially if they are using different programmes in schools. Teacher knowledge around tier 3 is critical for these children to have success in school.

Question 19: *What do you think about our proposal that wrap-around services should be provided to at-risk and vulnerable students through easy access to allied health professionals? What would you add or change?*

I agree there needs to be a wrap-around service under agencies rather than professionals so all the professionals are part of the wrap around services. The Ministry of Education, The Ministry of Health, Oranga Tamariki - The Ministry for Children and Whaikaha - The Ministry of Disabled People should all be working together to provide a unit of support, financial funds, and training for vulnerable children when they are of school age.

Teaching Resources

Overall we support the proposals because it is the Ministry of Education's place to provide their employees the resources to do the job they have been employed to do and do it well. It should never come down to whether a school can afford to purchase a resource. In my opinion the system has let the school and the children down and is not providing equal opportunities.

We have some concerns we wish to highlight / We have suggestions for how to improve the proposals.

I have concerns around how the Ministry will approve suitable resources. As I saw with the Dyslexia Kete, the Ministry refused to add any international resources to the recommended list even though they were more compatible for dyslexic students. The need to only be and only provide New Zealand resources is not providing our children with the best resources. In fact it is limiting their learning, especially for our vulnerable tier 3 children.

There needs to be accountability for the resources that are listed and there needs to be reviews and checks on the resources to make sure they align with SOR and SL. This is the Ministry of Education's job and the staff, advisors and practitioners that are employed in the Ministry should have this knowledge. If they don't have this knowledge, then the question must be asked as to why they don't.

Question 20: *What teaching resources should be funded or provided by the Ministry of Education so all teachers can deliver structured literacy teaching in their classrooms?*

The most valuable resource the Ministry can provide teachers is knowledge of a structured literacy approach. Once you have knowledge of What, What, When and Whom teachers can and will be able to use any structured literacy resource or programme if they choose to.

I recommend a resource kete that will be funded and will include a range of resources for every school to support all children in years 0-13 and in Tier 1, Tier 2 and Tier 3.

A few examples are:

- Samples of approved school wide scope and sequences to teach the alphabetic principle which have a list of spelling patterns and concepts/syllable types
- A school wide vocabulary scope and sequence on separate subjects or topics and how it incorporates into the other school wide scope and sequences
- A school wide morphology scope and sequence and how it incorporates into the other school wide scope and sequences
- Storybooks for oral language in the early years, chapter books with pre-made lesson plans on the topics to build knowledge
- Games to support all scope and sequences
- A variety of decodable books and passages
- Intervention programmes that align with the science of reading and structured literacy scope and sequences and resources to support our most vulnerable children.
- On going training to build knowledge on the EGL principles and Neurodiversity Affirming best practice for all children in schools
- Webinars to extend knowledge and build on from training.
- Access to international published ebooks, novels, chapter books, Storybooks, teacher manuals
- Computer programmes should be reviewed against a checklist and then a recommended list provided to all schools at a reasonable price. So all children can access it.
- Handwriting training and manuals
- Writing Scope Sequence

Professional Learning textbooks and reading material should be accessible to all teachers to help support their learning and understanding. I have listed a few examples -

- Anita Archers Direct Instruction
- Multisensory Teaching of Basic Language Skills
- Nancy Young The Ladder Reading and Writing book
- Structured Literacy for Intervention
- Effective Instruction in Reading and Spelling
- Overcoming Dyslexia
- The Writing Revolution
- The Writing Rope
- Word Aware Vocabulary Teaching Manuals
- William van Cleave Writing Matters
- Spelling for Life
- Reading for Life
- Language for Life

Question 21: *Do you have any views on whether the Ministry should run a central procurement process for resources, or leave it to individual schools to purchase resources with a given budget?*

Yes I believe as stated in question 20 that options must be provided for schools purchase and they must be reviewed. It is the Ministry's job to provide all the main resources to all schools. The training, resources, and programmes should align with the science of reading and structured literacy and they should include international options and not just NZ made.

Schools shouldn't have to source the best price or option, they should be able to purchase or access from the MoE who can bulk purchase giving schools choice and free up funding for other resources. Training, resources and programmes all range in cost and to make it equal for all all schools should have access to the highest quality training , resources and programmes not what is deemed fundable. The goal is to list literacy levels in New Zealand quality must come before quantity

I do believe schools will still need funding for extra resources to make choices for children with very high or high needs , children who have suffered trauma, cultural or environmental reasons, but all teaching curriculum materials should be provided by the Ministry of Education and updated regularly. This is the only way you can assure all children are receiving a high quality and equal education regardless of their postcode.

Other policy areas

Question 22: *Do you agree that alongside improving literacy pedagogy, the next highest priority for additional focus and funding support for schools is to ensure schools have sufficient teacher aides and training support to cater for the needs of all students with additional learning and behaviour needs? What changes in this area do you want to see prioritised by the incoming Government?*

Yes I agree, qualified in class support is crucial to the teacher and for student learning.

Question 24: *Do you agree that the Government should look to change the new entrant enrolment settings to have two intakes of new entrant children over a year?*

Yes

DEB would like to acknowledge and thank LLA for all their hard work and the hours that went into writing this policy and paper. Thank you for advocating for our children's right to read.

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