February 16, 2024

The Honorable Blanca Rubio
Assembly District 48
1021 O Street, Room 5250
Sacramento, CA 95814

RE: AB 2222 (Rubio)
Position: Oppose

Dear Assemblymember Rubio:

Californians Together respectfully opposes AB 2222 (Rubio). We agree that addressing equity and literacy outcomes is a high priority for California and that our state is not yet where it needs to be with literacy outcomes for all students – especially for our English learner, Black, brown and low-income students, but AB 2222 is not the prescription that is needed for our multilingual, diverse state. As an organization whose mission is to fight for an education system that is structured so English learners will have full access to a high quality 21st century education, we share your sense of urgency and commitment to equitable literacy opportunities for all students but have strong concerns about the efficacy and potentially harmful impacts of both the content and the approach of AB 2222.

Over the past decade California has built a strong and visionary research-based framework of policy and guidance for language and literacy education. This framework includes the adoption of comprehensive English Language Arts (ELA) and English Language Development (ELD) standards, along with a groundbreaking ELA/ELD framework. Additionally, it includes the passage of the Education for a Global Economy (EdGE Initiative) by the California voters to enhance biliteracy opportunities, the passage of the State Seal of Biliteracy and the adoption of the visionary California English Learner Roadmap policy. Recent efforts, including the revision of teacher preparation through the passage of SB 488 (Rubio, 2021), the adoption of the CA Master Plan for Early Learning and Care (2021), and the creation of California’s Comprehensive State Literacy Plan, further support the foundation of this new language and literacy framework. These initiatives align with research, cater to the needs of California's diverse population, and set ambitious goals for the promise of effective literacy and biliteracy.

These recent shifts in language and literacy education are having a positive impact. However, AB 2222 would impose a major shift in the wrong direction. This is not a time to reverse and
**erase the progress that has been made—but rather to recognize what IS working and further enhance progress.** On the National Assessment of Educational Progress (NAEP), California maintained steady literacy outcomes between 2011 and 2022, even though the state has become more low-income and linguistically diverse compared to other states. It has improved from being among the lowest-performing states to reaching the national average for 8th-grade reading outcomes. California, along with Mississippi, had the largest gains on the 4th grade NAEP reading between 2011 and 2019.

When examining positive outlier districts in California serving Black, brown, and English learner students, commonalities in their strategies emerge. Specifically, these districts prioritize comprehensive literacy instruction and emphasize explicit teaching of phonics, phonemic awareness, and decoding during the early grades, alongside fostering rich literacy environments from kindergarten to third grade. Districts integrate culturally relevant texts, extensive oral language opportunities, and both integrated and designated ELD with strong connections between ELA and ELD. Instead of mandating rigid curricula, teachers in these districts employ student-responsive, assessment-based approaches that facilitate essential differentiation to support diverse students in achieving mastery of standards. They leverage students' experiences and cultural knowledge, utilizing relevant curriculum materials that integrate language and literacy practices across all subject areas. It is imperative that we learn from and replicate the successful strategies employed by these districts.

**We know what works for literacy education for multilingual learners. While the proposed legislation uses the term “science of reading”, AB 2222 does not adequately reflect the research on multilingual learners.** It lacks the robust and comprehensive approach necessary to address the language and literacy needs of California’s multilingual learners. After decades of persistent school failures to adequately address the language and literacy needs of California’s multilingual learners, it is imperative to heed what research clearly indicates is necessary: investments in providing comprehensive, robust language and literacy education tailored to address the second language development, dual language development, and multiliteracy needs of our culturally and linguistically diverse students.

In addition to incorporating elements of reading instruction and literacy development for all students, a comprehensive approach for English learners integrates support and instruction specifically tailored to address their unique assets and challenges. These students often come to school with a home language other than English, requiring encouragement and support to leverage the resource of their home language while navigating the complexities of learning English and overcoming potential barriers to participation, comprehension, and engagement as second language learners. Supporting language and literacy development for English learners necessitates attention to and acknowledgment of their dual language and bicultural realities, as well as instructional approaches that capitalize on and promote the development of their multiple
languages. A comprehensive approach includes inter-related components, all of which are vital and mutually reinforcing. No single component alone constitutes a sufficient reading or literacy approach.

**Components of a Comprehensive Literacy Approach for English Learners**

<table>
<thead>
<tr>
<th>Precursor Skills (TK, K)</th>
<th>Essential Literacy Components</th>
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</thead>
<tbody>
<tr>
<td>• Oral language</td>
<td>• Vocabulary</td>
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<tr>
<td>• Phonemic awareness</td>
<td>• Oracy</td>
</tr>
<tr>
<td>• Basic concepts of print</td>
<td>• Comprehension and meaning-making</td>
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<tr>
<td>• Active and joyful engagement with books</td>
<td>• Cross language connections</td>
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<tr>
<td>• Memory and visual processing</td>
<td>• Writing</td>
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<tr>
<td></td>
<td>• Motivation and engagement with text</td>
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</tbody>
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**Foundational Skills**

- Phonemic awareness
- Letter knowledge and alphabetic principle
- Phonics and decoding
- Concepts of print
- Fluency

**Essential Literacy Components**

- Vocabulary
- Oracy
- Comprehension and meaning-making
- Cross language connections
- Writing
- Motivation and engagement with text

**Explicit attention to English Language Development**

- Integrated and Designated ELD

**Contexts of Literacy Development**

- Integrated content knowledge and Language/Literacy through thematic instruction
- Knowledge building curriculum
- Language-rich, print-rich and content-rich learning environment with access to books
- High quality and culturally inclusive relevant materials
- Safe, affirming and assets-based relationships and classroom/school cultures
- Development of home language and bilingualism

**Opportunities for Biliteracy Development**

- Strategically aligned literacy instruction across two languages
- Literacy development authentic to each language
- Dual language assessments of literacy
- Use of literacy for and in academic study in both languages

*AB 2222 will halt and even reverse important progress underway.* California’s recent commitment to universal preschool and the expansion of Transitional Kindergarten is a historic investment in setting an early foundation of learning with an explicit focus on equity. An
evaluation of California’s Transitional Kindergarten found that TK significantly increases literacy skills for all students in key areas like phonological awareness and letter-word identification skills, with the largest gains for English learners and children from low-income families. Our state is completing an update of the California Preschool TK Learning Foundations, including guidance for research-based developmentally appropriate early language and literacy education.

Likewise, the California Commission on Teacher Credentialing has worked for almost two years on implementing SB 488 (Rubio, 2021) to strengthen the preparation of teachers to teach reading and literacy. This work began with the development of Literacy Teacher Performance Expectations (TPE) and is now developing the Performance Assessments for Multiple Subject, Education Specialist, and PK-3 credentials. Recently, the Commission on Teacher Credentialing issued guidance to university teacher preparation programs on how to structure their courses and instruction aligned to the new Literacy Teacher Performance Expectations.

In addition, the legislature and the Governor authorized $1 million in the 2022-23 budget for the development of a Literacy Roadmap. Members are currently being appointed to serve in an advisory capacity to assist the Department in the development of this Literacy Roadmap. The goal of the Literacy Roadmap is to provide guidance on teaching, training, and using evidence-based practices on effective reading instruction. This is not the time to interrupt these current efforts.

**Multiliteracy is the way of the future—particularly for our diverse state in this 21st century—and must be a cornerstone of literacy education policy. AB 2222 fails to center biliteracy.** California is a diverse, multilingual state. A commitment to increasing biliteracy opportunities and improving biliteracy outcomes has been established through the EdGE ballot initiative, Global California 2030, the California English Learner Roadmap policy, and the state Seal of Biliteracy. For California’s 1.1 million English learners, biliteracy needs to be at the heart of literacy approaches. Any literacy approach that doesn’t center on biliteracy, and that fails to address biliteracy pedagogy, is simply inadequate for our state.

**California’s schools cater to diverse communities within various local contexts. Literacy policy must accommodate the addressing of local needs and priorities, with a focus on student-responsive teaching.** Professional learning and instructional materials are crucial in this regard, but they must encompass all components of a comprehensive literacy approach, rather than narrowing the focus to just one or two aspects. However, AB 2222 imposes a uniform mandate for implementation across our diverse state. This implementation strategy is highly problematic and unlikely to succeed. Appropriately, AB 2222 recognizes the crucial need for literacy instructional materials and for professional learning, but it does not adequately respect local control, the need for teachers to implement student responsive and assessment-based instruction that responds to the students and communities they serve, nor the complexities of
leading instructional change across a diverse state.

California's literacy policy needs to embrace the full range of a research-based comprehensive approach that centrally addresses the developmental needs of culturally and linguistically diverse students. It should build and invest on promising initiatives already in progress, explicitly align with the state ELA and ELD standards, and enact the robust ELA/ELD Framework. Furthermore, it should empower teachers to address the diverse needs of their students. It should play a direct role in promoting and fostering the development of biliteracy and dual language programs and pedagogy. It should facilitate access to and utilization of language-rich culturally inclusive materials, allow for local responsiveness to local contexts, and ensure accountability at the state level for delivering on literacy goals for all.

For these reasons, **we oppose AB 2222 (Rubio)**. Should you have questions regarding our position, feel free to contact me or our legislative advocate, Cristina Salazar at cristina@californianstoggether.org.

Sincerely,

Martha Hernandez
Executive Director