

## **Submission of feedback on the final consultation paper:**

### **Lifting Literacy**

### **Lifting Tasmania**

#### **General feedback**

I would like to express **gratitude and admiration** for the members of the panel for their considerable time, openness, and expertise in compiling this paper. I think I join everyone who advocates for evidence-informed literacy approaches in congratulating the panel, and all the stakeholders, presenters and submission writers who have contributed to this outcome. The emphasis on the importance of science informing literacy instruction is a **monumental step in improving literacy** outcomes for Tasmania.

I broadly agree with all the recommendations and information presented in the paper, and of particular importance is **mandating the Phonics Screening Check and screening language/phonological processing** in schools, as well as the emphasis on external quality assurance and the **key role of AERO in guiding educator training in Tasmania**. AERO is an organisation established and funded to guide evidence-based practice in schools, and has been integral in monitoring and guiding the processes of change required (see examples [here](#)). In the future, it makes sense for AERO to contribute heavily to governance and quality assurance in other educational sectors, such as UTAS, TAFE and adult and community settings.

#### **Suggestions for clarification:**

**Although I am happy with the broad recommendations of the proposed framework, it is somewhat weakened by lack of clarity related to evidence-informed instruction and assessment.** I imagine this is partly due to the difficulty in gaining consensus about particular issues and wording. The ambiguity about some points means that some of the messages are vulnerable to misinterpretation, in much the same way that has happened with the national inquiries into literacy instruction in the US and Australia. In the past this has resulted in structured literacy being combined with whole language elements to be coined "balanced literacy". However, the initiatives listed above will hopefully be "protective factors" in ensuring increasing application of the science of reading to literacy instruction. An analogy can be drawn to a vulnerable child who thrives regardless, because of protective factors in the environment.

Nevertheless, clarifying ambiguous wording and naming ineffective current practises would strengthen the framework and leave it less vulnerable to misinterpretation and misapplication. When reading these suggestions, please note that I understand the **critical importance of all components of a broad definition of literacy**, including the Big 6 for reading and writing. My

comments focus on specific parts of foundational literacy (mainly phonemic awareness and systematic synthetic phonics). This is because teaching of these skills in many Tasmanian settings, compared to other literacy skills, is the *least* informed by the science of learning to read.

Balanced literacy, PM Benchmark and cuing:

It is very encouraging that "balanced literacy" and "3-cuing" were mentioned by the paper as not being "effective for all children". However, **I don't know of anyone who understands the science of reading who would consider the cuing strategy to be an effective form of literacy instruction for anyone, although many learn **in spite of it**. Cuing is a technique that is diametrically opposed to the Science of Reading (e.g. the brain science of how we learn to read proficiently). Cuing (asking what makes sense from the picture, parts of words, context or syntax) is a key component of whole language approaches, which may seem to be working in the short-term, but are found to be ineffective over time (or even yield **worse results than no intervention**, as seen in a recent [study](#) of Reading Recovery). The cuing strategy has been thoroughly [debunked](#) by science. For example, see this major human rights inquiry by experts and researchers which clearly concludes that cuing methods are not in line with science and **should be dropped as a matter of human rights**: <https://www.ohrc.on.ca/en/right-to-read-inquiry-report/executive-summary>.**

The importance of systematic phonics instruction has been concluded by decades of research and national inquiries. "Balanced literacy" approaches that are common in Tasmanian schools, like **PM Benchmark assessment and predictable texts**, do not align with systematic phonics instruction, as they encourage reading practice and assessment of all the code in a non-systematic way. Approaches to literacy instruction can be viewed on a continuum from whole language to structured literacy. The greater the whole-language components of the instruction, the more it fits the category of "balanced literacy", and the further it is removed from structured literacy and the science of reading.

Furthermore, [research](#) specifically indicates the ineffectiveness of informal reading inventories based on book levelling, like the PM Benchmark system. The system in this study (Benchmark Assessment System) is very similar to the PM Benchmark system, originating from the same ideas which led to Reading Recovery (like cuing). These measures based on levelling are not validated against external measures and therefore there is no evidence supporting their use. In the above study, the benchmark system was especially poor at identifying struggling readers. The study's author, Matthew Burns, is quoted as saying that "flipping a coin would actually be better" than this measure for identifying children who needed help (<https://features.apmreports.org/sold-a-story/>). In correspondence quoted with permission, he said, "I contend that the limitations

discussed above are also true for other informal reading inventories” and that “we have to abandon the idea of levelling” (quoted with permission from correspondence). My suggestion is to **name specific balanced literacy practices in the framework, and clearly state that these practices should not be used.**

As a literacy practitioner working with a range of people, including those with significant disabilities, I am constantly battling against the outcomes of these practices, which in most cases dominate reading instruction in public schools. The resulting habits are so engrained in older children and adults with disabilities that it becomes extremely hard to try to re-wire the brain pathways to teach the critical skills of decoding and encoding. **One of the hardest things to change is their engrained habit of guessing words** from the look of the word or parts of the word, in combination with pictures and context. Many of them just make up stories that go with the pictures, as they may have been praised for any words they do guess correctly. In my interactions with other practitioners and educators, a great number are committed to providing evidence-informed instruction, but their **skilled teaching is undermined by pressure from education leaders to continue with levelled assessment and reader systems** such as PM Benchmark and Running Records. These policies are presumably to promote consistent and universal systems for all schools, as emphasised in the Department of Education Assessment Strategy 2020–2023. This report states the goal of continued moderation of school assessment systems, and expanding on existing assessment systems. Other government [documents](#) specify Running Records, PM Benchmark assessment and cuing strategies as very common and desirable in schools. Consistency is, of course, a valuable goal, but given these existing projects within the former Department of Education, it is pressing to have **governance around specific assessments and resources, requiring these to be evidence-informed.** If this can't be stated in the final paper due to diverse opinions in the panel, it is worth us all being aware of the importance of this and spreading the message wherever possible.

#### Decodable and authentic text:

With the above points in mind, it is important to clarify the guidance about reading material under the heading "The role of books and decodable readers". It is excellent that the importance of decodable books is emphasised, but the mention of "children's literature in teaching" and "age-appropriate rich texts" is problematic. This is because it does not make the **important distinction between books read by educators and books read by students.** It should be made clear that general children's literature (also called "authentic texts" in the national curriculum) should be read by the educators -although book-sharing should direct the child's attention to the written text, including learnt code and words when possible. It is **important not to conflate language comprehension with word recognition,** as is

exemplified by the Simple View of Reading, a model that is very useful for understanding the science of reading and is strongly supported by research and logic. Students can't comprehend words that they can't recognise. It is crucial to understand that written word recognition and language comprehension are separate skills, and that each factor is necessary but not sufficient. They come together in reading, but you can work on language comprehension without written word recognition. **The child does not need to read authentic text themselves to gain the language comprehension benefits discussed in the paper** ("enjoyment of reading, enabling children to extend their vocabulary and develop strong spoken language skills and practice inferential comprehension"). If they are encouraged to do so without having the required code knowledge, this is an **indirect form of cuing, because they are forced to rely on the cues of picture, context and syntax**. Contrary to the opinion of some, students who are advanced in their phonics knowledge and reading ability do not need to be held back from progressing further in a structured literacy program. They can practise reading at a higher level of code, or beyond decodable text (authentic text) when appropriate. In the classroom they can benefit from differentiated instruction, with more emphasis on vocabulary, comprehension, fluency and creativity. They can also consolidate their foundational skills and build higher-level literacy and social skills by helping other children learn. **Focussing on essential foundations does not need to hold back more advanced learners.**

Tasmanian **libraries**, despite running tutoring programs for literacy, have a very limited selection of **decodable books** in libraries. These books are also extremely hard to utilise correctly because they are mixed with non-decodable books in alphabetical order of the author. A colleague of mine was told by a Libraries Tas staff member that decodable books are specialist books, which is why there is a lack of focus on these books in libraries. Similarly, some people express the opinion that decodable books need to be read with the help of someone with specialised phonic knowledge, compared to other texts. The opposite is the case. Non-decodable books require helpers with highly specialised knowledge and skill to choose which words or parts of words to read themselves, decide which code to draw attention to, and to support the learner to read words they can recognise or decode without relying on cuing. In contrast, decodable books make it much easier for people to help learners with reading practice, if the helper knows which code the learner has mastered (or the books can be chosen by someone with this knowledge). Preferably, this is achieved by communicating with educators. In the **school or intervention setting**, using decodable text means helpers are much less reliant on expertise and experience with the individual – these helpers can include substitute teachers, parent helpers, other children in reading dyads, etc.

### **New free initiative:**

The new Lifting Literacy framework should improve access to decodable books in schools and libraries. However, this will take years to evolve, and a greater quantity and quality of evidence-informed resources will always be beneficial for the community. Therefore, I'd like to draw attention to a free initiative I have started since my last submission to the panel. This is the **Decodable Book Swap Hobart** (see this private [group](#) on Facebook). It is an informal system like the concept of Street Libraries. The aim is to facilitate access to decodable books for those without sufficient access to them from school or libraries. It is also designed to encourage parent communication with educators about the learner's current mastery of code in a systematic phonics program. Lastly, it aims to promote awareness of the science of reading, by the information in the books themselves, and having an online community with links to well-researched information.

### **The Grammar and Phonology Screening measure (GAPS):**

Mandating the GAPS is an important step for early identification of those at risk of literacy problems. However, it is also important to encourage educators to monitor and address **Phonemic Awareness** in Kindergarten, prep and early grade one (before the Phonics Screening Check). Educators could use measures at their discretion if links and guidance are readily available on the online Literacy Hub. The GAPS measures skills related to phonological processing, especially nonword repetition which measures phonological memory. It does NOT measure phonological awareness, which is one of the essential Big 6 components of reading instruction. Although phonological memory is one indicator of phonological deficit, it may not capture difficulties for children who can remember strings of sounds so they can repeat non-words, but cannot isolate, blend, segment or manipulate phonemes. These are essential skills for literacy, some of which can be reliably assessed from Kindergarten. These phonemic awareness skills form the subset of phonological awareness that is most directly relevant to early reading and spelling, especially **blending phonemes for reading and segmenting phonemes for spelling**. These specific skills can be selected from free criterion-referenced tests such as the following, which can be used from Kindergarten: <https://heggerty.org/downloads/#resource-categories-4>  
[https://www.languagedynamicsgroup.com/cubed/cubed\\_download/](https://www.languagedynamicsgroup.com/cubed/cubed_download/)

Even more importantly, there needs to be guidance on using information from the GAPS and other measures to inform instruction for individuals. Important points include that **language instruction should be structured and explicit**, and that research shows **phonemic awareness instruction should be taught in the context of written words** as soon as possible.

*Once again, I appreciate the skills and dedication of the panel and am grateful for the opportunity to contribute to this consultation process.*

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