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**RE: US Department of Education; ED-2025-OS-0680; Proposed Priority and Definitions Secretary's Supplemental Priority and Definitions on Meaningful Learning Opportunities**

Dear Secretary McMahon,

Thank you for the opportunity to provide a comment on the “Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Meaningful Learning Opportunities.” My name is Dr. Delphia Smith, an Assistant Professor of Reading/Literacy Education in the School of Education at Howard University. As a scholar, my research centers literacy, underestimated (Black and Brown) children, and inequities they face, often marked by unequal treatment, access, and outcomes. I have also had the opportunity to write about research-based evidence on the state of reading as it relates to America’s students along with practical ways on how to improve literacy/reading outcomes.

Underperformance in reading in U.S. Public Schools continues to be an issue, dating back 40 years. Recent reading data released from the National Center for Education Statistics revealed that 31% and 30% of the nation’s fourth and eighth graders respectively, scored at or above reading proficiency level, [a critical benchmark of progress], with a two-point decrease for each grade level when compared to 2022. The data illustrates that **less than one third of America’s 4th and 8th graders are reading proficiently**, representing a continual downward trend. The proposed priority, which is to support meaningful learning opportunities for students through the provision or expansion of access to high-quality instructional materials, is one way to help improve reading outcomes for America’s children. However, to ensure America’s K-12 students are afforded meaningful learning opportunities, implementation must account for the systemic inequities that shape literacy outcomes.

## **Systemic Change**

While the latest scores are concerning for the entire public school system, the reading performance of students from multilingual and multicultural backgrounds reveal an education system that is underperforming and in need of systemic change. These students continue to face more barriers in schools than other groups and struggle the most in an education system that fails to meet their needs.<sup>1</sup> As such, there continues to be a need for complete, systemic reform of America's K-12 education system with a focus on equity, inclusion, and multiculturalism. In a school system that is marked by inequity, there are significant differences evident in the scores of students, where those who generally live in low-income areas and have less access to qualified teachers and multicultural curricula have some of the lowest performance. This cycle of underperformance is even more pronounced amongst the most underserved populations.<sup>2</sup> Such complexities in increasing the reading outcome of all students are embedded in social, cultural, economic, and historical forces which play out in subtle and pernicious ways in U.S. classrooms (Tatum, 2000).<sup>9</sup>

## **High Quality Literacy Instruction**

Over the past two decades, there has been consistent momentum to enact laws that propose changes in literacy instruction.<sup>6</sup> Broadly, high quality literacy instruction includes the use of reading research and evidence-based reading practices such as the Science of Reading [SOR], while utilizing identity affirming/multicultural/multilingual reading curriculum, and assessment. The goal of improving reading for all students, particularly underrepresented students, should offer a path to instruction that supports culturally relevant pedagogical practices that embed students' culture as well as background and where individual needs dictate the instructional approach teachers take to teach their students.<sup>8</sup>

## **Literacy Equity**

Literacy equity ensures that all students, no matter their background, have access to support and resources to become proficient readers.<sup>3</sup> This requires a commitment to providing proactive, integrated, equitable literacy instruction for all students, while addressing systemic inequities and barriers that disproportionately affect historically marginalized groups. Additionally, competitive preference points in literacy-related grants for programs that integrate both evidence-based reading instruction and culturally responsive teaching approaches should be created. Every child has the right to learn to read and write and should be afforded every opportunity to acquire the skills needed to be successful. Considering this, strong reading and

writing skills are at the heart of student achievement; and therefore, should be part of the solution towards greater equity.<sup>7</sup>

It is worth noting that **the growing concern regarding systemic and institutional inequities are not necessarily reflective of failing students, but rather unequal access to qualified and experienced teachers, as well as a curriculum and educational resources that does not mirror America's multicultural and multilingual student population.** America's K-12 public schools continue to be divided along racial, economic, and academic lines.<sup>10</sup> The latest NAEP reading data revealed that less than 40% of the nation's 4th, 8th, and 12th graders were reading proficiently, a modest performance that underscores the state of America's public education.<sup>4</sup> Although a 2% to 6% points variation in scores existed over 40 years, a 50% overall proficient level in reading has never been attained.<sup>5</sup> In addition to the evidence presented here, **your agency should consider America's diverse student population when choosing high quality instructional materials because it would not only afford meaningful learning opportunities, but improve reading outcomes for all of America's children.**

Sincerely,

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- <sup>1</sup> Darling-Hammond, L. (2001). Inequality in teaching and schooling: How opportunity is rationed to students of color in America. In *The right thing to do, the smart thing to do: Enhancing Diversity in the Health Professions* (pp. 208-213). Washington, DC: The National Academies Press. doi: 10.17226/101861. Darling-Hammond, S. (2023). *Fostering belonging, transforming schools: The impact of restorative practices*. Learning Policy Institute.
- <sup>2</sup> Flores, A. (2017, September 18). *How the U.S. Hispanic population is changing*. Pew Research Center. <https://www.pewresearch.org/short-reads/2017/09/18/how-the-u-s-hispanic-population-is-changing/>
- <sup>3</sup> Integrated Comprehensive Systems for Equity. (2025). 7 Steps to literacy equity in the science of reading. <https://www.icsequity.org/literacy-equity-in-the-science-ofreading/>
- <sup>4</sup> National Assessment of Educational Progress NAEP (2019a). The Nation's Report Card: 2019 Reading Snapshot (8th Grade). <https://nces.ed.gov/nationsreportcard/subject/publications/stt2019/pdf/2.020014NP8.pdf> National Assessment of Educational Progress NAEP (2019b). The Nation's Report Card: Reading Assessment Highlighted Results (12th Grade). <https://www.nationsreportcard.gov/highlights/reading/2019/g12/> National Center for Education Statistics. (NCES, 2025). 2024 NAEP Reading Assessment: Results at Grades 4 and 8 for the Nation, States, and Districts. <https://nces.ed.gov/use-work/resource-library/report/statistical-analysis-report/2024-naep-reading-assessment-results-grades-4-and-8-nation-states-and-districts>
- <sup>5</sup> National Center for Education Statistics. (2024). District average scores: National Assessment of Educational Progress (NAEP), various years, 2002–2022 reading assessments. <https://www.nationsreportcard.gov/reading/districts/scores/?grade=4>
- <sup>6</sup> Neuman, S. B., Quintero, E., & Reist, K. (2023). *Reading reform across America: A survey of State legislation*. Albert Shanker Institute.
- <sup>7</sup> Sedita, J. (2020). Literacy and equity in education. *Keys to Literacy*. <https://keystoliteracy.com/blog/literacy-and-equity-in-education/>
- <sup>8</sup> Snow, C. E., & Matthews, T. J. (2016). Reading and language in the early grades. *The Future of Children*, 26, 57–74. doi:10.1353/foc.2016.0012
- <sup>9</sup> Tatum, A. W. (2000). Breaking down barriers that disenfranchise African American adolescent readers in low-level tracks. *Journal of Adolescent & Adult Literacy*, 44(1), 52–64. <http://www.jstor.org/stable/40016858>
- <sup>10</sup> United Way of the National Capital Area. (2025). *Understanding Racial Inequality in Education: Challenges and Solutions* <https://unitedwaynca.org/blog/racial-inequalityin-education/>