

June 20, 2025

U.S. Department of Education
400 Maryland Avenue SW, Room 7W213
Washington, DC 20202-6450

RE: Public Comment related to Federal Register Number 2025-09093 [Docket ID ED–2025–OS–0020]
Evidence-Based Literacy, Education Choice, and Returning Education to the States

Dear Secretary of Education McMahon, and All Interested Parties:

In response to the Secretary’s proposed [three initial and urgent priorities](#)¹ and the call for public comments, please accept this on behalf of multiple parent and family advocacy organizations from across our nation in response to *Proposed Priority One – Evidence-Based Literacy*.

All our organizations share a common goal: we want to uplift the educational opportunities for all children and youth in our country, furthering their prospects to become gainfully employed, civically active, and fully participatory members of our society.

All of us also have in common that our children, family members, and communities have suffered from poor quality of reading instruction in schools.

We agree with the Secretary that “The ability to read is the foundation for all learning, unlocking opportunities for academic, professional, and personal achievement and strengthening critical thinking skills essential to lifelong success.” (*Proposed Priority One*)

Our public comment is intended to inform that:

- 1) Effective evidence-based literacy instruction should include explicit, systematic, and intentional instruction in phonological awareness, phonic decoding, vocabulary, language structure, reading fluency, reading comprehension **and** language development, and the building of background knowledge;
- 2) We have concerns related to how “strong or moderate evidence” is defined, and how those definitions can adversely impact the outcomes intended behind this proposed Priority; and,
- 3) We have grave reservations about the significant budget cuts that will negatively impact the high-quality and rigorous research that is undertaken by The Institute of Education Sciences (IES), and yet a contract with What Works Clearinghouse has been reinstated. We believe these decisions will negatively impact the ongoing research necessary for the continued study of how to help struggling readers.

Given that the Secretary may choose to use an entire priority for a grant program, including discretionary grant programs, we felt it important to provide this public comment for consideration in anticipation of the rule-making process for the Secretary’s *Proposed Priority 1: Promoting Evidence-Based Literacy*. Because public comments are intended to provide insight into the potential impact **on** the public, we believe that our collective body of advocacy organizations hold a wide range of perspectives representative of our nation, but with overall agreement behind the proposed Priority 1:

“Proposed Priority: Projects or proposals to do one or more of the following:

(a) Advance, increase, or expand evidence-based literacy instruction (as defined in this notice), or (b) Focus on evidence-based literacy instruction (as defined in this notice).”

We believe it is imperative that “Effective evidence-based literacy instruction should be supported by strong or moderate evidence that relates to explicit, systematic, and intentional instruction in phonological awareness, phonic decoding, vocabulary, language structure, reading fluency, and reading comprehension.” (from *Proposed Priority One*) Importantly here though, we bring to the Secretary’s attention for consideration: Reading ability must develop so that students can comprehend at increasing levels of sophistication, which is the whole point of reading. As such, we believe also required for effective evidence-based literacy instruction is language development and the building of background knowledge. The research shows students benefit from instruction that emphasizes the development of key aspects of oral language comprehension as foundational reading skills are being developed. Furthermore, we urge the Department to consider that while the foundational reading skills—often referred to as the “big five”—are critical, they alone may not be sufficient to support the literacy development of all student populations. Effective literacy instruction must also incorporate practices that attend to the diverse linguistic and cognitive needs of learners, including those who may be acquiring academic English while simultaneously building foundational reading skills. Some examples of oral language comprehension include vocabulary, syntax, phonology, and discourse. These components are foundational to reading comprehension and must be taught through intentional and explicit instruction. While elements of language may develop through exposure, research supports that direct and systematic instruction in these areas significantly benefits students’ reading outcomes, particularly as texts and academic demands increase.²

In addition, we believe that writing development is also vitally important for the development of reading proficiency. Research has shown that “...writing and the teaching of writing enhance not only students’ comprehension and fluency when reading but also their recognition and decoding of words in text.”³

Effective evidence-based literacy instruction must also be guided by assessment and intervention, as needed, and so we urge the Secretary to consider all these necessary and important components related to evidence-based literacy instruction in our mutual desire to see all children and youth in our country become proficient readers.

Another intention behind this public comment is to bring our concerns related to how “strong or moderate evidence” is defined, and how those definitions can adversely impact the outcomes intended behind this proposed Priority. In particular, we point to the Proposed Definitions titled “Evidence framework” which defines what must be included in an activity, strategy or intervention in order to meet the definition of “strong or moderate evidence.” Because this definition which is contained in [20 U.S.C. 7801](#) subsection (21)(A)(i)(I–II)) has the potential to be broadly interpreted, we next look at the entities identified in the Proposed Priority One that may be allowed to implement and verify said evidence framework, in particular pointing to concerns we hold regarding What Works Clearinghouse.

Clearinghouses, by their nature, are intended to set standards of scientific quality to vet existing research in determining how “evidence-based” an intervention is. The challenges come in when there are presumptions offered to the public that consideration has been given to overall credibility of the underpinning research supporting the study(ies), the overall effectiveness, whether the outcomes are replicable, and most importantly, whether there are long-term evidence-based outcomes that are followed and measured.

In that regard, we believe broad reliance on the What Works Clearinghouse in the Proposed Definitions is troublesome. For context, we highlight that the What Works Clearinghouse was established in 2002 “to be a central and trusted source of scientific evidence for what works in education.”² Unfortunately, we hold specific concerns such as those that are highlighted in the white paper prepared by the National Institute for Direct Instruction. Their [report](#)⁴ concluded:

- 1) The What Works Clearinghouse suffers from a lack of transparency in its policies and guidelines,
- 2) the conclusions they create in their reports can be misleading, and
- 3) the reports are potentially damaging to program developers and ultimately the success of students.

There is also the factual occurrence where What Works Clearinghouse gave a positive review to Reading Recovery, which is a short-term, intensive intervention program designed for early-grade students struggling with reading and writing. Since the positive review issued by What Works Clearinghouse, Reading Recovery has been thoroughly discredited as not based on evidence and subsequent studies have shown students who had Reading Recovery actually performed worse than students who did not.

Also important, the Every Student Succeeds Act requires that educators use Title I funding for practices in the top tier of the What Works Clearinghouse, meaning that at least one research finding shows strong evidence of effectiveness. While not authoritative in itself, [this report](#) cites numerous studies that support their findings: the vast majority of What Works Clearinghouse’s claim of scientifically validated practices are not as effective as researchers claim, and focusing on them is causing educators to misdirect their efforts at improvement.⁵

All the above related to What Works Clearinghouse is shared to highlight our deep concerns for what we consider potential pitfalls to the well-intentioned Proposed Priority No. One. In that regard, we highlight an April 2025 report entitled *Harnessing Innovation: Options for Implementing Living Evidence at the Institute of Education Science*⁷, which illustrates how the Department of Education’s Institute of Education Sciences (IES) could build on existing processes to better support the recommendations and reviews published by What Works Clearinghouse. The report sets out a proposed foundation which would allow IES to more responsively share when new best practices and innovative approaches are identified in academic literature through the What Works Clearinghouse.

The Institute of Education Sciences (IES) has served as a guiding light for U.S. education research for decades. The work done by IES has supported high-quality, rigorous research and has successfully answered critical questions about “what works” in key areas like improving reading achievement.⁶

Unfortunately, the recent cancellation of nearly all active contracts, including those that made the What Works Clearinghouse’s work possible, and a reduction-in-force (RIF) that led to the firing of nearly all IES’s staff has led to an inability for IES to make the proposed, necessary changes that are highlighted in the *Harnessing Innovation* report.

We believe that it is the Secretary’s intention to ensure evidence can connect directly to policy and practice. Further, we recognize the challenges that are faced when considering these separate but related questions: “What constitutes evidence and how do we connect evidence to policy and practice” so we share with the Secretary a report called “[Guide to Evidence](#)” prepared in Nov. 2024 by G. Reid Lyon, Ph.D., John Wills Lloyd, Ph.D., Maria S. Murray, Ph.D., and Douglas Carnine, Ph.D. responding to

this very question. We point out that Dr. Lyon served at the National Institutes of Health from 1992 to 2005. All the authors are considered experts in the field. Their paper illustrates “...how research-based insights can inform policy and set the stage for educational practices that evolve toward becoming evidence-based.”

We strongly encourage the Department of Education to consider all that is contained in the “Guide to Evidence” and further, we strongly encourage restoration of the funding necessary for IES and the Secretary and Department of Education to carry out the intended commitments to the children and youth of our country, ensuring they become proficient readers which is vital in this Age of Information.

We welcome the opportunity to discuss this further.

Sincerely,



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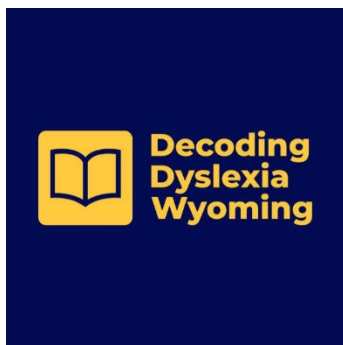
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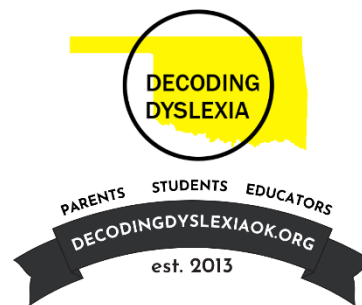
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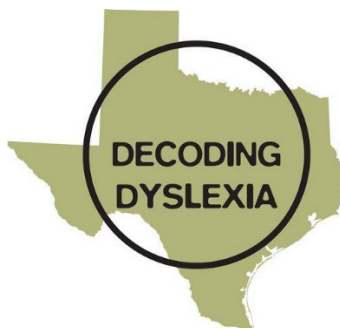
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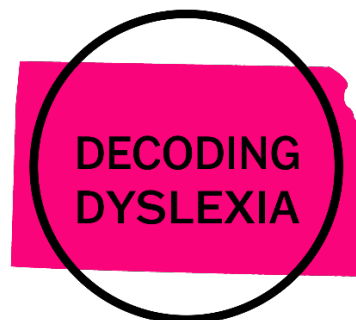
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RESOURCES

1. U.S. Federal Registrar, Federal Register Number 2025-09093, <https://www.regulations.gov/document/ED-2025-OS-0020-0001>
2. Silverman, R.D., Johnson, E.M., Keane, K., & Khanna, S. (2020). Beyond decoding: A meta-analysis of the effects of language comprehension interventions on K–5 students’ language and literacy outcomes. *Reading Research Quarterly*, 55(S1), S207– S233. <https://doi.org/10.1002/rrq.346>
3. International Literacy Association (2020) Teaching Writing to Improve Reading Skills. <https://www.literacyworldwide.org/docs/default-source/where-we-stand/ila-teaching-writing-to-improve-reading-skills.pdf>
4. Does the What Works Clearinghouse Really Work? Investigations into Issues of Policy, Practice and Transparency (2017) <https://www.nifdi.org/docman/research/white-papers/1431-does-the-what-works-clearinghouse-really-work-investigations-into-issues-of-policy-practice-and-transparency/file.html>
5. (<https://kappanonline.org/avoid-evidence-based-practices-pogrow/>)
6. Getting ‘What Works’ in Education into the Hands of Teachers and Students (May 2025) <https://fas.org/publication/living-evidence-at-ies/>
7. Harnessing Innovation: Options for Implementing Living Evidence at the Institute of Education Sciences <https://fas.org/wp-content/uploads/2025/04/Harnessing-Innovation-Implementing-Living-Evidence-at-IES.pdf>
8. Guide to Evidence (2024) <https://evidenceadvocacycenter.org/wp-content/uploads/EAC-Evidence-Guide.pdf>