# Expert Brief: Standardized Tests vs. Wilson Program Progress in Profound Dyslexia

This brief is intended to support expert testimony explaining why standardized tests cannot be used as the sole or primary measure of progress for students with profound dyslexia, particularly when the student has demonstrated substantial gains through the Wilson Reading System.

## 1. Why Standardized Tests Fail to Capture Progress

- Standardized tests are often timed, speed-based, and heavily dependent on rapid word recognition, which remains a relative weakness for students with profound dyslexia, even after significant instructional gains.
- Such tests undervalue improvements in decoding accuracy, comprehension strategies, and confidence gained through structured literacy programs.
- As noted by leading researchers (Catts, Fletcher, Wagner, Eden), high-stakes reading tests are poor growth monitors for individual students with dyslexia.

## 2. Wilson Step-10 Mastery as Evidence of Learning (example)

- The Wilson Reading System is a 12-step structured literacy program. Progress to Step 10 indicates mastery of advanced decoding, encoding, and fluency skills.
- Wilson includes built-in mastery checks and fidelity measures that directly document skill acquisition.
- These program-based data points are recognized as valid, research-backed indicators of progress.
- For the student in question, Step-10 progress demonstrates irrefutable growth even if standardized scores remain low.

## 3. Legal Requirements for Multiple Measures

- IDEA (20 U.S.C. §1414; 34 C.F.R. §300.304) requires schools to use 'a variety of assessment tools and strategies' to evaluate student progress.
- Reliance on a single standardized test score to deny or diminish services violates this mandate.
- Courts (e.g., R.E.B. v. Hawaii DOE) have recognized that standardized testing cannot be the sole determinant of educational benefit.
- Under ADA/§504, failure to account for the nature of dyslexia in assessment can constitute deliberate indifference.

## 4. Key Expert Testimony Talking Points

- Standardized tests measure group-norm efficiency, not individual mastery.
- Profound dyslexia causes a persistent gap on timed measures, regardless of real learning.
- Wilson Step-10 progress shows the student can now read and comprehend at a far higher level than before.
- The appropriate measure of FAPE is meaningful growth, not a percentile rank on a flawed instrument.

**Conclusion: An expert can clearly testify that standardized tests are unreliable indicators of true progress for students with profound dyslexia. Program-based mastery data (such as Wilson Step-10 performance) provide stronger, legally sound evidence that the student is benefiting from instruction.**