

Fundations® Counter Evidence by Indicator Across Grades for EdReports Gateway 2

Wilson Language Training could provide counter evidence for errors and omissions in the EdReport’s report on Fundations. The evidence herein is specifically related to Gateway 2 indicators that received negative commentary leading to “partially met” scores.

Unfortunately, the comprehensive evidence was largely ignored by EdReports. Therefore, we are making this response public to educators so that they can consider this critical information when evaluating the validity of the EdReports’ conclusions.

Fundations stands by its research-based instructional design and offers a structured literacy approach to teaching total word structure, spelling and handwriting.

2.1 Guidance for Implementation, Including Scope and Sequence

Indicator	Commentary
<p>Indicator 2D.I Scope and sequence clearly delineate the sequence in which phonological awareness skills are to be taught, with a clear, evidence-based explanation for the expected hierarchy of phonemic awareness competence. (K-1)</p>	<p>In Levels K and 1, the “partially meets” commentary was directed toward a general scope and sequence for phonological awareness skills. It was noted that although the scope and sequence references the phonemic awareness hierarchy as outlined by Marilyn Adams, the “materials have a limited cohesive sequence of phonemic awareness instruction based on the expected hierarchy to build toward students' application of the skills.” There was also concern that teachers had to look at specific lessons in order to determine the exact focus of the phonemic awareness part of the lesson. Finally, the review pointed to concerns over the use of graphemes within activities used for phonemic awareness training, despite a reference to the research in the Teacher’s Manual stating that “using letters to teach phonemic awareness is found to be more effective than using sounds alone (NICHD, 2000.) Thus, phonemic awareness training in Foundations is closely linked with the direct teaching of the Alphabetic Principle (letter sound/ grapheme-phoneme correspondences).”</p>
<p>Foundations’ evidence provided for consideration</p>	<p>Regarding sequence: While the indicator itself seems neutral in allowing programs to demonstrate a research-based scope and sequence and rationale for that scope and sequence, the comments reflect an expectation of a scope and sequence of skills that matches Gateway 1 indicators (rhyming, segment syllables, onset-rime, phonemic awareness). As explained in our Gateway 1 questions, Foundations follows a different pathway in helping students achieve mastery of phonemic awareness. Foundations spends the most time in terms of the scope and the sequence on the most complex skill of phoneme blending and segmentation that is the key to the skill of decoding/reading. We recognize that the intent of the review may be to ensure programs move along the continuum in order to get to the complex skill of phonemic awareness, but we would like to offer that the phonemic awareness scope and sequence IS presented as embedded within the scope and sequence of corresponding phonics skills due to the integrated nature of instruction as outlined previously.</p> <p>Regarding scope: As outlined in our statements/questions regarding Gateway 1, Foundations Echo/Find Words and Dictation/Words activities require students to hear and segment sounds in words. Students are given a word orally first, and they segment without the letters using the Wilson tapping technique. This requires the student to identify the initial, medial, and final sound. After this, they either find the corresponding letter tiles or they write the letters. The scope of these activities on the most important skill of segmenting individual sounds in the word is significant. This skill is taught in an integrated manner with other activities to maximize learning and mastery [a strategy recognized by the CCSS, which states that “Often, several standards can be addressed by a single rich task...” (p.5)] The review seems to be looking for an activity “labeled” or called out as an activity of “Phonemic Awareness.”</p>

2.2 Decodable Texts

Indicator	Commentary
<p>Indicator 2F.i Materials include decodable texts with phonics aligned to the program’s scope and sequence and opportunities for students to use decodables for multiple readings.</p>	<p>In Levels K, 1 and 2, the “partially meets” commentary was directed toward an insufficient amount of decodable text embedded in the program, as well as concerns around the alignment of the existing decodable text to the program’s scope and sequence.</p>
<p>Indicator 2F.ii Materials include decodable texts with high-frequency words aligned to the program’s scope and sequence and opportunities for students to use decodables for multiple readings.</p>	
<p>Foundations evidence provided for consideration for both 2.fi and 2.fii is the same.</p> <p>It is recognized that additional opportunities for reading decodable text for phonics and for high-frequency word practice aligned to the Foundations scope and sequence are critical. This understanding is why the Geodes[®] grade-level books were developed to specifically align with the scope and sequence of Foundations Levels K, 1, and 2. Geodes[®] are a critical text resource, aligned to the Foundations Scope and Sequence, that offers extended practice in the application of taught skills. While Geodes[®] are not bundled within the Teacher’s Kit, this was done purposefully: to, amongst other reasons, allow districts to have more funding options to be able to more easily purchase the classroom library set. Given the significant role these newly created texts play in providing much-needed practice in the application of taught foundational skills in authentic text, we believe it is important to note the availability of the Geodes[®] for practice in the application of skills taught in Foundations, and aligned to the program’s scope and sequence.</p> <p>For the purpose of consumer understanding, it is interesting to see that Ed Reports has chosen to separate this indicator into two parts: 2fi) having decodable texts for phonics, and 2fii) decodable texts for high frequency words. It is noteworthy that a program could potentially ‘meet expectations’ for this criterion (2fi-2fii) if they meet expectations with many books that only include high frequency words.</p> <p>Apart from the Geodes[®], commentary on the two indicators suggest that the decodable text included within our Teacher’s Manuals do not align to the scope and sequence. For example, in Level 1 there is a comment that states “In the Level 1 Teacher’s Manual, Unit 8, Overview, p. 270, blends and r-controlled vowels are introduced. In Unit 8 Week 1 Day 5, Storytime, p. 282-283, the charted story, “The Pink Dress,” includes three words with blends.” <i>This is factually untrue.</i> Twelve (12) <i>unique</i> blends (24 blends <i>total</i>, including the title) are included in the short story the “The Pink Dress” (<i>dress (x8), pink (x4), held (x2), silk (x2), small (x2), best, glad, just, mend, thank, went</i>). It is also important to note that these stories build on and practice cumulatively taught concepts, and so they will have words from the current concept being taught but will also contain many concepts from previous units to be practiced. In any case, the stories are highly controlled and decodable at the Unit in which they are included so that the students can have targeted practice in taught skills.</p>	

2.3 Assessment and Differentiation

Foundations assessment is efficient and effective. The Evidence Guides point out that the CCSS state, “The point is to teach students what they need to learn and not what they already know—to discern when particular children or activities warrant more or less attention.” Foundations’ assessments efficiently and effectively determine this by incorporating data points from:

1. **Performance assessment aligned to Foundations’ scope and sequence:** The daily learning activities themselves are a performance assessment. This critical, informal formative assessment occurs daily as teachers assess a student’s progress while teaching in real time. It becomes visibly clear to the teacher during the activities which students have mastered a skill and which students are struggling. The teacher can see which students can tap a particular word, correctly form a letter, accurately manipulate tiles to spell, etc. This informs the development of diagnostically planned lessons, and any further support for students in need.
2. **Foundations Unit tests and check-up:** These assess the most complex skill of encoding, efficiently identifying students who have mastered the targeted phonics skills and those who need additional support. The Foundations’ Unit tests follow a timeline recommended by Student Achievement Partners* which states, “Additionally, every 4-6 weeks use a more thorough unit assessment...with time for responding to data with remediation or enrichment built into the scope and sequence. This systematic approach to assessment ensures students don’t fall far behind in learning the foundations of reading.” (*Foundational Skills Guidance Documents: Grades K-2*, Student Achievement Partners, p.15)
3. **Foundations Progress Monitoring Tool:** For those needing additional support, the Progress Monitoring Tool is utilized to pull apart and assesses skills more explicitly to be able to effectively target instruction for struggling students. This tool is available for free to all teachers on the PLC and is an integral part of the full implementation of Foundations. Given the nature of the Foundations program, which includes additional assessment and practice for students *who have demonstrated the need* during informal and formal formative assessment during the standard lesson, we strongly feel that this tool (which is included in the teacher’s kit as part of the “standard package”) be considered in the review as it is indeed intended for *all students* who need them.
4. **Foundations Fluency Kits:** For those needing additional support, the Foundations Fluency Kits are utilized. These provide practice with sounds, words, phrases, and stories, and offer as assessment component in which teacher track progress on the Recording Form. The Fluency Kits are available for free to all teachers (included in the teacher’s kit) and are an integral part of the full implementation of Foundations. Given the nature of the Foundations program, which includes additional assessment and practice for students *who have demonstrated the need* during informal and formal formative assessment during the standard lesson, we strongly feel that Fluency Kits should be considered in the review as they are indeed intended for *all students* who need them.
5. **Formal, external progress monitoring assessments:** Assessments that teachers are already using in the classroom can be a source of valid data for informing student mastery of foundational skills. Recognizing that DIBELS, AIMSweb, and other assessments were already being used by schools across the country, Foundations was designed to avoid added duplicative testing of the same skills and instead incorporated dictation & spelling assessments to gather deeper data of where students may be struggling.

As the Evidence Guides state (p104), “Assessments of foundational skills are not intended to be a battery of test administered to the students. Materials should contain assessment opportunities that help the teach monitor student’s progress and then provide the teacher with support to reteach when students are not successful in learning the foundational skill.” Foundations materials achieve this goal when all aspects of the program are viewed.

Below, for each of the Assessment and Differentiation indicators, we have offered additional context and evidence to provide clarification Foundations’ approach.

* Student Achievement Partners was founded by David Coleman, Susan Pimentel, and Jason Zimba, who were lead writers of the Common Core State Standards in literacy and mathematics. Their well-respected board of directors includes Michael Casserly, Executive Director of the Council of Great City Schools, and Gene Wilhoit, former executive director of the Council of Chief State School Officers (CCSSO). One advisor is David Liben, who “synthesized the research behind the Common Core State Standards in ELA” (<https://achievethecore.org/author/14/david-liben>). Like Ed Reports, Student Achievement Partners’ “focus on increasing the availability of high-quality, standards-aligned instructional resources; increasing awareness and selection of those resources by educators; and building the capacity of educators to align instruction for all students to challenging standards” (<https://achievethecore.org/about-us>).

Indicator	Commentary
<p>Indicator 2G.1 Materials regularly and systematically offer assessment opportunities that measure student progress through mastery of print concepts (K-1), letter recognition (K only), and printing letters (as indicated by the program scope and sequence) (K-1).</p>	<p>In Levels K and 1, the “partially meets” commentary was directed toward a lack of detached assessment of print concepts, letter recognition and letter formation. While those areas are assessed directly in an integrated manner during various activities and unit tests, and further for students in need of more explicit assessment, it was noted that Foundations’ “materials do not regularly and systematically provide a variety of assessment opportunities over the course of the year to demonstrate students’ progress toward mastery and independence of print concepts and letter formation” and that, in Kindergarten, “there is not an end-of-year cumulative letter recognition assessment that all students would take to show the teacher students’ current skills in letter knowledge.”</p>
<p>Foundations’ evidence provided for consideration</p>	<p>Foundations assesses print concepts, letter recognition, and letter formation/printing letters through Dictation Activities and Unit Tests (which are dictation-based assessments) because dictation is a retrieval and production exercise, and a real-world application of these skills. Sentence dictation (K: beginning in Unit 5; grade 1: beginning in Unit 2) assesses students’ understanding of many skills, including:</p> <ul style="list-style-type: none"> • letter formatting/printing letters (requiring retrieval and production of letter-recognition skills) • a sentence boundary with capitalization and punctuation, • punctuation and left-to-right orientation, and • differences between letters and words. <p>Students for whom print concepts are not easily grasped will be identified through both formal and informal formative instruction as described above in WLT’s general explanation of its assessment framework. Students scoring poorly on any Unit test will be further assessed with the Progress Monitoring Tools, which are part of Foundations’ “standard package” and an integral part of the full implementation of the program.</p> <p>It should be recognized that <i>print concepts</i> will also be taught in the core ELA program that will be paired with this foundational skills program. As a result, assessment of print concepts will be incorporated into that part of the classroom instruction.</p>

Indicator	Commentary
<p>Indicator 2G.II: Materials regularly and systematically offer assessment opportunities that measure student progress of phonological awareness (as indicated by the program scope and sequence). (K-1)</p>	<p>In Levels K and 1, the “partially meets” commentary was directed toward “limited instructional suggestions for assessment-based steps to help students to progress toward mastery in phonological awareness” and toward assessment opportunities not being “offered comprehensively, regularly, or systematically to measure overall phonological awareness progress.”</p> <p>Also, in Level K it was noted that “not all of the phonological awareness skills identified on the Level K scope and sequence are formally assessed, including rhyming and the manipulation of phonemes.”</p> <p>In Level 1, attention was called to the phonological awareness skills directly assessed in the Progress Monitoring assessments, but they were not considered as “these assessments are not intended for all students.”</p>
<p>Fundations’ evidence provided for consideration</p>	<p>Spelling is a retrieval and production exercise that draws on an individual’s phonological and phonemic awareness skills (among other skills), thus providing an efficient way to assess the individual across multiple skills at once. Thus, Foundations utilizes a weekly Dictation Activity and end-of-Unit tests (which are spelling assessments) to systematically and regularly offer extensive assessment opportunities that measure student progress in phonological and phonemic awareness. The Unit tests provide spelling assessments which are a targeted indicator of many skills at once and allow teachers to make a supported decision about whether or not to have students do additional targeted assessment and instruction.</p> <p>The rationale of using dictation/spelling activities to assess students’ phonological and phonemic awareness is that students need to hear and identify initial, medial, and final sounds in CVC words in order to successfully spell them. When they use the tapping method during dictation, they are both counting and segmenting all the sounds within a word. The segmentation of these sounds is a higher-level skill than that of onset and rhyme. If a student is not able to spell, further assessment is necessary to determine the gaps in their foundational skills set. This is integrated into the full implementation of the Foundations program through the Progress Monitoring Tool.</p> <p>Using spelling (as required in Foundations’ dictation activities and in Unit Tests) to assess phonological awareness is supported by research indicating that:</p> <ul style="list-style-type: none"> • “Spelling is a linguistic task that requires knowledge of sounds and letter patterns” (Joshi, Treiman, Carreker, & Moats, 2008, How Words Cast Their Spell, https://www.aft.org/sites/default/files/periodicals/joshi.pdf, p7-8). • Spelling “requires separating out the individual sounds in a spoken word...” (International Dyslexia Association website, https://dyslexiaida.org/testing-and-evaluation/). • “The relation between phonological awareness, (or the ability to hear and manipulate sounds in speech), alphabetic knowledge and spelling is well-established” (Foorman & Francis, 1994; Moats 2005, 2006; National Reading Panel 2000; Santoro et a.,l 2006). • “Knowledge of speech sounds and their spellings, and fluent use of this knowledge, are necessary for both word reading and spelling” (Joshi, Treiman, Carreker, & Moats, 2008, p.9). • Good spellers “demonstrate a good sense of the sounds in words...” (Joshi, Treiman, Carreker, & Moats, 2008, p.9). • “...memory for spelling patterns relies on and is facilitated by an understanding of linguistic concepts, including speech sounds, sound-letter correspondences, word origins, and meaningful parts of words” (Joshi, Treiman, Carreker, & Moats, 2008, p.16). <p>The review noted that Foundations’ “materials provide limited teacher support in regard to instructional adjustments to help students make progress.” However, it is important to recognize the role of the teacher in planning each daily lesson. The Teacher’s Manuals encourage teachers to:</p> <ul style="list-style-type: none"> • “diagnostically plan lessons with all of the student groups in mind so that your questioning can both target student difficulties and challenge more “advanced students,” and • “be sure to give Unit Test to all students. Use scores for ongoing monitoring and planning for student trouble spots.”

	<p>These targeted difficulties, or trouble spots, are identified through the errors that students make on assessments.</p> <p>Assessment-based steps are clearly outlined with recommendations to provide any student scoring below 80% with targeted instruction. See Level K Teacher’s Manual (pp. 184, 229, 296, 342, 407) and the Level 1 Teacher’s Manual (pp. 99, 125, 152, 177, 194, 229, 265, 293, 321, 357, 395, 433, 471, 499) for examples.</p> <p>The assessment-based instruction is then outlined in detail on the PLC. See “Additional Support Activities” documents with specific instructions for targeted lessons at each Level of Foundations. Furthermore, students placed in this group will have progress monitoring with steps further outlined.</p> <p>The structure of the Foundations program acknowledges the critical nature of “frequent, ongoing, informal assessment (that) takes place on a regular basis.” It is understood that “(teachers) need to know whether students are mastering taught skills in phonics and phonemic/phonological awareness. Students should be assessed weekly on the current skill(s) of focus, so that immediate re-teaching and support can be provided if needed. These assessments can be simple and routinized.” In Foundations, this assessment technique is adhered to through weekly Dictation activities that assess spelling.</p>
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Indicator	Commentary
<p>Indicator 2G.III Materials regularly and systematically offer assessment opportunities that measure student progress of phonics in- and out-of-context (as indicated by the program scope and sequence). (K-2)</p>	<p>In Levels K, 1 and 2, the “partially meets” commentary was directed toward unit tests, which the review noted “do not include a full assessment of all phonics taught” and “do not provide a complete measure of student progress,” despite noting that the “teacher’s manuals indicate that any student scoring below 80% on a given skill should meet with the teacher individually for additional support,” and acknowledged that “teachers are directed Intervention Guidelines on the PLC”, that support was not considered sufficient and it was noted that “materials support teachers with limited instructional suggestions for assessment-based steps to help students to progress toward mastery in phonics.”</p> <p>Finally, in Level 2, there was an additional comment that “unit tests do not require students to read (decode) words or sounds to the teacher.”</p>
<p>Fundations’ evidence provided for consideration</p>	<p>The note that “Level K Foundations materials include limited opportunities to measure student progress of all grade-level phonics taught” does not recognize the use of dictation/spelling activities and Unit Tests (with dictation/spelling tasks) as valuable measures of students’ decoding skills, and does not consider the use of the Progress Monitoring Tool as well as the full battery assessment options as outlined in WLT’s general description of how Foundations assesses student learning of specific skills.</p> <p>As noted in the indicator above, spelling (as required in Foundations’ dictation activities and in Unit tests) can be used to measure component skills, including phonics. This is supported by the following:</p> <ul style="list-style-type: none"> • “Studies have found that effective spelling instruction explicitly teaches students sound-spelling patterns and therefore, an assessment of students’ spelling skills can understand students’ grasp of sound-spelling patterns.” (Joshi, Treiman, Carreker, & Moats, 2008 https://www.aft.org/sites/default/files/periodicals/joshi.pdf, p.8). • “Spelling is a linguistic task that requires knowledge of sounds and letter patterns” and that “spelling words and decoding them tap similar underlying abilities.” (Joshi, Treiman, Carreker, & Moats, 2008, p. 7 and p. 9) . • “Good spellers are almost always good readers. We generally cannot accurately spell words we cannot read” (Joshi, Treiman, Carreker, & Moats, 2008, p.9). • “Memory for spelling patterns relies on and is facilitated by an understanding of linguistic concepts, including speech sounds, sound-letter correspondences, word origins, and meaningful parts of words” (Joshi, Treiman, Carreker, & Moats, 2008, p.16). • “Spelling is the opposite of word attack, but it is even more difficult. It requires the separating of sounds in a spoken word, remembering the different ways each sound might be spelled, choosing one way, writing the letters for that sound, and doing the same, again, for the next sound in the word. Spelling is complicated by the ease or difficulty the child has in writing the letters, legibly and in the proper order” (International Dyslexia Association website, https://dyslexiaida.org/testing-and-evaluation/). • “In alphabetic spelling, students learn to match individual letters to sounds in a left-to-right fashion... these students made significantly greater gains on measures of phonemic decoding, fluency, and encoding, • “... a meta-analysis conducted by Graham and Hebert (2010) summarizing the effects of instructional practices in writing on reading outcomes found that teaching spelling had a strong effect on reading fluency among students in grades one to seven (effect size = 0.79) and word reading skills in grades one to five (effect size = 0.68).” (<i>Why Teach Spelling?</i>, https://www.centeroninstruction.org/files/Why%20Teach%20Spelling.pdf, p.5) <p>It is also a recommended practice by Student Achievement Partners, founded by several lead authors of Common Core State Standards, which recommends the use of Dictation to assess phonics skills. In its section on “Systematic Phonics Assessment,” it states, “Give a brief weekly phonics</p>

assessment...This consists of... carefully selected words and one sentence, given as a dictation... This will give teachers frequent data and allow for quick, effective remediation without delay” (*Foundational Skills Guidance Documents: Grades K-2*, p.15).

The review noted that “materials provide limited teacher support in regard to instructional adjustments to help students make progress.” It is important to recognize the role of the teacher in planning each daily lesson. The Teacher’s Manuals encourage teachers to:

- “diagnostically plan lessons with all of your student groups in mind so that your questioning can both target student difficulties and challenge more advanced students” and
- “be sure to give Unit Tests to all students. Use scores for ongoing monitoring and planning for student trouble spots.”

These targeted difficulties, or trouble spots, are identified through the errors students make on assessments.

Assessment-based steps are clearly outlined with recommendations to provide any student scoring below 80% with targeted instruction. See Level K Teacher’s Manual (pgs. 184, 229, 296, 342, 407), Level 1 Teacher’s Manual (pgs. 99, 125, 152, 177, 194, 229, 265, 293, 321, 357, 395, 433, 471, 499), and Level 2 Teacher’s Manual (pgs. 93, 121, 139, 167, 197, 225, 263, 281, 309, 337, 365, 383, 411, 439, 467, 485, 513) for examples. Furthermore, the Progress Monitoring Tool is an integral part of the full implementation of Foundations and should be included in the review.

The assessment-based instruction is outlined in detail on the PLC. See “Additional Support Activities” documents with specific instructions for targeted lessons at each Level of Foundations. Furthermore, students placed in this group will have progress monitoring with steps further outlined.

Indicator	Commentary
<p>Indicator 2G.IV Materials regularly and systematically offer assessment opportunities that measure student progress of word recognition and analysis (as indicated by the program scope and sequence). (K-2)</p>	<p>In Levels K, 1 and 2, the “partially meets” commentary was directed toward materials not assessing students’ ability to “read all of the learned high-frequency words and applying word analysis skills to decode words.” It was also noted that “materials support teachers with limited instructional suggestions for assessment-based steps to help students to progress toward mastery in word recognition and word analysis.”</p>
<p>Fundations’ evidence provided for consideration</p>	<p>The note that Foundations materials include limited opportunities to measure student progress of word recognition and analysis skills does not recognize the role of spelling as a valuable assessment of these skills.</p> <p>Fundations assesses high frequency irregular words (or “Trick Words” in Foundations) through spelling during all Dictation activities and Unit tests. Spelling is a highly effective way to determine a student’s ability to both spell and read. Spelling is a useful assessment of irregular high frequency words because “recognition of words ‘by sight’ is facilitated by knowing the details of sound-letter correspondence in the spelling system. Good spellers are also familiar with the patterns and constraints of English spelling and use that knowledge to help them remember specific letters in specific words. On the other hand, general ‘visual’ cues, such as the configuration or outside contour of a word in print, are not very helpful for either recognizing or recalling printed words” (Joshi, Treiman, Carreker, & Moats, 2008, https://www.aft.org/sites/default/files/periodicals/joshi.pdf, p.7).</p> <p>As noted in the indicators above, spelling (as required in Foundations’ dictation activities and in Unit tests) can be used to measure component skills, including word recognition and analysis skills. This is supported by the following:</p> <ul style="list-style-type: none"> • “Good spellers are almost always good readers. Spelling, however, is more difficult than reading. We generally cannot accurately spell words we cannot read. On the other hand, since most of us spend much more time reading than writing, we typically read many more words than we spell... If we do learn to spell a word, the mental representation of all the letters in that word are fully specified in memory, and recall is likely to be fluent and accurate.” (Joshi, Treiman, Carreker, & Moats, 2008, https://www.aft.org/sites/default/files/periodicals/joshi.pdf, p. 9) • “... a meta-analysis conducted by Graham and Hebert (2010) summarizing the effects of instructional practices in writing on reading outcomes found that teaching spelling had a strong effect on reading fluency among students in grades one to seven (effect size = 0.79) and word reading skills in grades one to five (effect size = 0.68).” (<i>Why Teach Spelling?</i>, https://www.centeroninstruction.org/files/Why%20Teach%20Spelling.pdf, p.5) • The real importance of spelling for reading is because: “Spelling and reading build and rely on the same mental representation of a word. Knowing the spelling of a word makes the representation of it sturdy and accessible for fluent reading” (Catherine Snow et al., cited in Reading Rockets: http://www.ldonline.org/article/8845/). • “...research has shown that learning to spell and learning to read rely on much of the same underlying knowledge — such as the relationships between letters and sounds — and, not surprisingly, that spelling instruction can be designed to help children better understand that key knowledge, resulting in better reading. (Moats, https://www.aft.org/sites/default/files/periodicals/Moats.pdf, p12) • “In fact, Ehri and Snowling found that the ability to read words ‘by sight’ (i.e. automatically) rests on the ability to map letters and letter combinations to sounds...Learning to spell requires instruction and gradual integration of information about print, speech sounds, and

meaning — these, in turn, support memory for whole words, which is used in both spelling and sight reading. (Reading Rockets: <http://www.idonline.org/article/8845/>).

The review noted that “materials provide limited teacher support in regard to instructional adjustments to help students make progress.” It is important to recognize the role of the teacher in planning each daily lesson. The Teacher’s Manuals encourage teachers to “diagnostically plan lessons with all of your student groups in mind so that your questioning can both target student difficulties and challenge more advanced students” and to “be sure to give Unit Test to all students. Use scores for ongoing monitoring and planning for student trouble spots.” These targeted difficulties, or trouble spots, are identified through the errors students make on assessments.

Assessment-based steps are clearly outlined with recommendations to provide any student scoring below 80% with targeted instruction. See Level K Teacher’s Manual (pgs. 184, 229, 296, 342, 407), Level 1 Teacher’s Manual (pgs. 99, 125, 152, 177, 194, 229, 265, 293, 321, 357, 395, 433, 471, 499), and Level 2 Teacher’s Manual (pgs. 93, 121, 139, 167, 197, 225, 263, 281, 309, 337, 365, 383, 411, 439, 467, 485, 513) for examples.

The assessment-based instruction is then outlined in detail on the PLC. See “Additional Support Activities” documents with specific instructions for targeted lessons at each Level of Foundations. Furthermore, students placed in this group will have progress monitoring with steps further outlined.

Materials support teachers in further assessment of students in need of remediation by providing an expected score that students should be achieving on Unit tests and by explicitly describing the importance of informal formative assessment during daily lessons. When teachers, using these tools, determine that a student is in need of more extensive support, that student should be moved into a small group intervention where their skills can be further targeted, honed and assessed via the progress monitoring tool.

Indicator	Commentary
<p>INDICATOR 2G.V Materials regularly and systematically offer assessment opportunities that measure student progress in fluency (as indicated by the program scope and sequence). (1-2)</p>	<p>In Levels 1 and 2, the “does not meet” criteria commentary was directed toward limited opportunities to measure student progress in fluency. Though it was recognized that the progress monitoring materials for both levels include fluency assessment, these were discounted because teachers are not directed to use them with “all students.”</p>
<p>Fundations’ evidence provided for consideration</p>	<p>Assessment of fluency skills in Foundations occurs in several ways.</p> <p>First, the Dictation Activities, which are aligned to the Foundations scope and sequence, offer insight into a student’s fluency skill. Because spelling requires one to integrate and apply multiple skills at once, including print concepts, phonological awareness, phonics, and word recognition and analysis, one’s performance on spelling measures (as in Foundations’ Dictation Activity) can be used to make an <i>initial</i> determination of which students are likely to need support in fluency. The rationale for using spelling as an initial determinate for a student’s fluency skills is based on:</p> <ul style="list-style-type: none"> • “... a meta-analysis conducted by Graham and Hebert (2010) summarizing the effects of instructional practices in writing on reading outcomes found that teaching spelling had a strong effect on reading fluency among students in grades one to seven (effect size = 0.79) and word reading skills in grades one to five (effect size = 0.68)” (<i>Why Teach Spelling?</i>, https://www.centeroninstruction.org/files/Why%20Teach%20Spelling.pdf, p.5) and • “In fact, Ehri and Snowling found that the ability to read words ‘by sight’ (i.e. automatically) rests on the ability to map letters and letter combinations to sounds...Learning to spell requires instruction and gradual integration of information about print, speech sounds, and meaning — these, in turn, support memory for whole words, which is used in both spelling and sight reading. (Reading Rockets: http://www.lonline.org/article/8845/). <p>The Unit tests, which assess spelling (see rationale above), are a targeted indicator of many skills at once, allowing teachers to make informed decisions about which students need additional practice or even intervention lessons. In the Unit tests, if a student scores below 80%, they would receive additional support. In some case, it would be indicated to provide intervention. Students who perform below benchmark are identified to receive targeted intervention. As part of the intervention, they receive instruction with the Fluency Kit, which is part of the “standard package” of Foundations. It is important to recognize that the Fluency Kit is not used with all students because advanced students are not likely to require this extra practice, given that they are also likely to be reading and practicing fluency in their core ELA program. However, for students who need the added practice with fluency, the use of the Fluency Kit provides an opportunity for both practice and assessment of fluency skills tracked on the Recording Form (see the Fluency Kit Instructions for details). Each page of the Fluency Kit identifies its align to a specific in Foundations.</p> <p>Fluency is also assessed through the Progress Monitoring tool, which pulls apart and assesses skills more explicitly to be able to effectively target instruction for struggling students. In grades 1 and 2, students are assessed on Nonsense Word Fluency and Oral Reading Fluency. The Section 1: Getting Started page of the Progress Monitoring tool’s Teachers’ Guide outlines the measures and benchmarks. Foundations intentionally does not direct teachers to use the progress monitoring tool to assess all students, although it specifically states that it <i>can</i> be used with all students (see p2 of the Progress Monitoring tool’s Teacher’s Guide). The intentional targeting of only those students who need further support is due to the reasons described in WLT’s general explanation of its assessment framework.</p>

Indicator	Commentary
	Finally, since Foundations is a supplemental foundational skills program, other progress monitoring tools are likely to be utilized in the classroom (DIBELS, AIMSweb, etc.). As a result, Foundations takes advantage of these assessments as further data points to guide decision-making. Again, see WLT’s general explanation of its assessment framework.

Indicator	Commentary
<p>Indicator 2I.I Materials regularly provide all students, including those who read, write, speak, or listen in a language other than English with extensive opportunities for reteaching to meet or exceed grade-level standards.</p>	<p>In Levels K, 1 and 2, the “partially meets” commentary was directed toward a lack of “differentiated instructional guidance” and “additional materials” for teaching students who are English Learners (EL).” It is not considered sufficient, although it is noted, that the teacher’s manuals “suggest that teachers provide additional supports in vocabulary and background knowledge by showing students pictures or using props and gestures”, “suggest creating opportunities for students to practice new vocabulary as well as use open-ended questions which will allow students to recognize instead of having to retrieve,” and state that ELs “benefit from principles of instruction built into Foundations including the teacher modeling and multi-sensory approach.” Interestingly, it was also noted in the review that the statements and strategies identified in the beginning of the manual and at the beginning of the units are “then implemented by the materials throughout the curriculum.” However, the review then determined that “these suggestions are unmet with examples, and therefore cannot be guaranteed for consistency nor quality.” It appears that the “partially meets” commentary revolves around “missed opportunities for daily plans to identify specific suggestions for English Learners.”</p>
<p>Foundations’ evidence provided for consideration</p>	<p>We believe quality instruction in foundational skills for all students, including English learners, is critical. The review recognized that Foundations comprehensively supports foundational skills instruction for struggling learners. There is an overlap between the instructional principles found to be effective for that population and those principles found to be effective for English learners. As explained in the Teacher’s Manual, the following key instructional principles that are critical for all students, and particularly important for EL students, are integrated into Foundations:</p> <ul style="list-style-type: none"> ○ Integration of listening, speaking, reading and writing ○ Explicitly modeled skill and strategy instruction ○ Verbal explanation for concepts enhanced by visual, physical and kinesthetic involvement ○ Opportunities for student interaction in supportive groups ○ Procedures that ensure student engagement with hands-on activities ○ Clear and consistent directions and cueing systems ○ Ample opportunities to reinforce skills ○ Scaffolded instruction ○ Repetition of vocabulary, including vocabulary of word structure (such as digraph, short vowel) ○ Assessment of current knowledge that is performance rather than language-based <p>In addition to the inherent support for ELs built into the instructional principles of Foundations, the program’s multi-tiered approach also supports English learners. The Foundations’ Teacher’s Manual explains how each activity within the daily lesson can be differentiated to meet students’ needs. This differentiation works for students within the classroom who may be advanced, struggling, or English learners. Since the performance of students in each activity within the daily lesson is highly visible, it is quickly apparent when a student has mastered or is struggling with a skill, and teachers can differentiate accordingly for students, including English learners. Struggles can be quickly addressed within the Foundations daily lesson or within intervention lessons, as warranted. Teachers needing further guidance and ideas on how to support English learners can find it on the PLC, Foundations’ companion learning community.</p> <p>The Foundations approach to EL instruction, as described above, seems to fit the requirements of the indicator: that “materials provide support for ELL students”; and that “general statements about ELL students or few strategies note at the beginning of a Unit or at one place in the teacher edition are then implemented by the materials throughout the curriculum.” It was noted in the comments that Foundations materials do provide “some differentiated instructional guidance for teaching students who are English Learners (EL).” While we acknowledge that Foundations does not include explicit callouts within daily plans specifically referring to EL students, the score Foundations received on this indicator seems to reflect that the way Foundations does daily support of ELs (through explicit, modeled foundational skills instruction with manipulatives and a gradual release student success model guided by performance-based assessment) was misunderstood.</p>

Indicator	Commentary
	<p>It is important to note that in many districts across the country, ELs are speaking a variety of languages. For example, in NYC public schools, over 150 different languages are spoken (infohub.NYCED.org; 2016-2017). Foundations’ approach provides comprehensive foundational skills instruction and appropriate interventions support as indicated following principles of instruction that support these learners, while also expecting that English learners would also be acquiring English skills through their English language arts instruction.</p>

Indicator	Commentary
<p>Indicator 2I.III Materials regularly provide extensions and/or more advanced opportunities for students who read, write, speak, or listen above grade level .</p>	<p>In Levels K, 1 and 2, the “partially meets” commentary was directed toward the teacher’s manuals providing only “brief suggestions for how to differentiate learning activities used throughout the program materials as well as ideas for differentiating each unit” and not providing suggestions for students to go “beyond the material presented” and “dive deeper into grade-level standards.” It was also noted that “differentiation ideas for advanced students are not included in daily lesson plans.”</p>
<p>Foundations’ evidence provided for consideration</p>	<p>The connection to research in this indicator points out that “Instruction should be differentiated: good readers will need much less practice with these concepts [Foundational Skills] than struggling readers will” (CCSS Foundational Skills, p. 15). Given that this a supplemental foundational skills program with a tiered approach, an advanced student would be receiving “less practice” in the foundational skills than their struggling peers, who perhaps need additional scaffolded instruction. Foundations <i>does</i> provide guidance to the teacher how to differentiate the Learning Activities for advanced learners. Given that these activities are conducted <i>daily</i>, the teacher can differentiate with <i>every</i> lesson. Furthermore, Foundations provides guidance at the beginning of the units for ways to challenge students within the concepts being taught.</p> <p>Comments sought additional examples of “opportunities for advanced students to dive deeper into grade-level standards” and “investigate grade-level foundational skills at a greater depth.” However, it is important to recognize that Foundations inherently challenges advanced students while setting high expectations for learning of all students and supporting struggling learners along the way. Other phonics programs do not go into same depth of word study as Foundations. While they may “call out opportunities” for deeper study, Foundations students already receive this deep dive during the standard lesson. We wonder if Foundations is penalized for already doing a DEEP dive into word structure as part of Foundations standard lesson.</p>