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Nov. 3, 2015 statement to State Board of Education Public Hearing on behalf of the Rural School Advocates of Iowa (RSAI), Dr. Bob Olson, Superintendent of the Clarion-Goldfield-Dows Community School District and Chair of the RSAI Leadership Group Robert.olson@rsaia.org (515)532-3423

Thank you for the opportunity to provide comments regarding the proposed Early Literacy Summer School Rules. The Rural School Advocates of Iowa, now counting 63 member school districts among us, are very concerned about opportunity and success for every student in Iowa, regardless of where they live. We appreciate the ability to show our support for early literacy focus and our concerns for details in the proposed summer school criteria.

Background: The Iowa Reading Research Center is charged to adopt program criteria and guidelines for the intensive summer literacy programs required by Iowa Code section 279.68. The proposed criteria and guidelines contained in the notice of intended action are based on the work and recommendations of a multiple member task team convened by the Center, which examined current practices in Iowa schools and evidence-based research on summer reading acceleration. These rules propose the criteria that intensive summer literacy programs must follow as schools are required to offer for third-graders who are substantially non-proficient, beginning in the Summer of 2017.

Intent: RSAI supports the intent of the proposed summer school rules, to establish research-based criteria and guidelines to help schools in delivering quality summer school experiences for students, including strong literacy programs demonstrated to improve literacy outcomes in early elementary. RSAI's foundational assumption is that completing a positive summer school experience is the preferred alternative to repeating third grade. Also critical is the district's ability to identify individual needs of all students, including those not reading on grade level in fourth grade, and deliver quality instruction, often individualized, to support those students to success. RSAI shares the goal of wanting all students to be successful readers.

Unique Rural Concerns: In agreement with the budget concerns expressed by other school groups, RSAI won't repeat those here. However, RSAI is additionally concerned about two issues with large consequences in rural schools. First, transportation costs are larger for rural districts and may actually drive some of the summer school structural considerations, such as how long the day lasts, how many days of instruction are provided, and the tension in the budget for paying for low class sizes versus larger transportation costs. We are concerned that transportation will likely be a mandated part of summer school service, yet funding may not be provided. Secondly, there are economies of scale in larger systems that might allow flexibility in arranging services or providing another teacher. In some of our high performing but rural school districts, there could be just a few additional students beyond the mandated maximum class size, but challenges to find teachers to teach summer school. We suspect funding will be insufficient to pay for two teachers in the event there are 16 students rather than 15. We believe the criteria including class size, small group size, hours of literacy instruction and staffing qualifications should be goals for districts to include in their summer school implementation, but some flexibility in delivery models is required. Although waivers are likely provided, the very nature of rural schools leaves us short on hands. Additional paperwork to fill out waiver requests takes time and deadlines may be missed. RSAI would prefer a process that initially respects local decision-making, then steps in through the accreditation process to provide additional support if student literacy results require oversight.

Thank you for the opportunity to provide our support for Iowa's investments in early literacy and our concerns about how the criteria for summer school are overly prescriptive in this case.

Bob Olson, Chair, RSAI Leadership Group