

The OHRC's 'Right to Read' inquiry is constructed upon a set of values that all educators and stakeholders share: *the right to read*. The R2R is connected to many other Rights-related calls and mandates; for instance, the UNC on the Rights of the Child mandate children's rights to be heard and freedom of expression "orally, in writing or in print, in the form of art, or through any other media of the children's choice."¹ Childhood is a "critical period for the realization of these rights"² and they must accompany the critical rights in our settler colonial context to Indigenous languages and literacies as called for in numerous reports^{3, 4} and policies. Further, UNESCO⁵ calls for inclusion of critical literacies, attending to reading of new text forms, and educational reform predicated in teacher professionalism. Collectively, these calls share an emphasis on *contextualization, responsiveness, and collective knowledge-generation*.

The interests of policymakers, researchers and practitioners are different. They are inevitably shaped by the different contexts in which they act, and the data this allows them to see. We need to find more profitable ways of working across these boundaries in the interests of the wider communities we serve.

(Moss, G. 2016. Knowledge, education, and research: Making common cause across communities of practice. *BERJ*, (42)6, 927-944).

However, in lieu of discerning how to better serve children by drawing on the full breadth of knowledge and research available, this report reifies the authors' position as *'the'* scientific knowledge, thereby privileging itself as "policy-based evidence⁶ within a narrow⁷ and highly selective collection of certain evidence followed by proposed 'solutions' that are normative,⁸ and often linked to commercial programs. The report ignores calls to diversify conceptualizations of what research can be considered part of a pluralized "sciences of reading⁹, evidence that there is no single, agreed upon approach to teaching reading to children who struggle with print literacy^{10,11}, evidence that the vast majority of children in Ontario are well-served by public education¹² and that there are numerous reasons for why children struggle with their reading achievement¹³. It perpetuates binaries and a derision of teachers' knowledge¹⁴ and public education, rather than supporting their capacities as adaptive experts¹⁵. Though the broad literature reflects the complexity of reading under-achievement¹⁶, the report singles out systematic phonics instruction as the 'perfect method¹⁷' or 'silver bullet¹⁸'. Contrary to the report's characterization of what is currently happening in Education, researchers in the literacy education field agree that systematic phonics instruction benefits children's reading accuracy; where it differs from the report, is the understanding that systematic phonics should be *one part of a repertoire of strategies^{19,20}* in a professional teacher's co-development of reading pedagogy. Western's courses, for example, include the teaching of systematic phonics, along with a range of modes and strategies that include attention to *all* of the language arts, embedded within culturally responsive teaching, differentiated instruction, Universal Design for Learning, and integrated attention to reconciliation, equity diversity and inclusion - in both our Initial Teacher Education, and Additional Qualifications programs. There is no longitudinal empirical evidence that the implementation of phonics-based curricular reforms in the US has systematically solved the problems of unequal and inequitable access to early reading for all children²¹. While there are quasi-experimental data on the efficacy of program A or program B, the curriculum and teacher training policy issue, is a large-scale system implementation of proposed reforms based on scientific findings. Schools are not labs, but complex institutional systems^{22,23,24,25} and large-scale adoption of recommendations must consider implementation in ways that are appropriate to existing successful practices, local and individual needs²⁶. Ignored in the report are hundreds of published papers over decades²⁷, including those that reported on the US *No Child Left Behind Policies* that demonstrate that mandates of phonics-based programs have led to a host of collateral educational effects and failed to address the systematic underperformance of cultural and linguistic minority student populations as well as and historically and currently marginalised working-class kids^{28, 29, 30}.

On one hand, the authors explicitly limit the problem of reading to a focus on 'dyslexia', yet on the other hand, their recommendations exert significant overreach from this focus by arguing for the removal of certain reading strategies *for all children*³¹. There is no clear scientific consensus that difficulties or differential achievement patterns in early reading and literacy more generally can be attributed to 'dyslexia', which itself is variously and contentiously defined.³² In a parallel move, the report speaks generally about 'literacy', but narrows the matter to reading – specifically initial reading, while selectively excluding or purposively interpreting data (e.g., PISA, TIMSS) on writing^{33,34} spelling and other language capacities³⁵. The report is not informed by (critical) disability studies (or any experiential knowing) privileging those who have historically spoken for/over 'disabled' people³⁶ and perpetuating a deficit tone toward difference. The intersectionality discussions are valuable but are unable to drill down into specific language groups, second language/dialect issues of specific Canadian First Nations and immigrant communities³⁷.

The recommendation to remove all references to cueing and cueing systems³⁸ ignores the value of these strategies in the social practice of reading³⁹ and ignores research that contends that a balance of approaches is indeed "the most effective way to teach reading".⁴⁰ A set of binary⁴¹ straw person arguments are set up using historic debates around whole language: e.g., that advocates of 'balanced reading' programs preclude curricular foci on direct or explicit instruction on phonemic awareness, grapho/phonemic capacity etc. and an 'assumed reader'. They assert a normative and unsubstantiated claim that a version of phonics will solve or address the problems of unequal and poor performance in early reading, with longitudinal effects on student growth, development, and academic

achievement. A similar argument was made in the US NRP and the UK Commission despite a lack of “strong RCT evidence that any one form of systematic phonics is more effective than any other”⁴². Consensus⁴³ within the *Science of Learning* community recommends forwarding an understanding of why phonics is so central, (especially in early instruction), but moves beyond phonics alone to demonstrate how it is integrated appropriately in a well- balanced literacy instruction program^{44, 45, 46, 47}.

Finally, there is little clear consensus even amongst phonics-advocates about *which* scientific version of phonics instruction 'works'. A review of the UK phonics literature and policies counts at least a half dozen contending approaches to phonics (e.g., synthetic, analytic, linguistic based, etc.⁴⁸) with minimal effect and “not sufficiently underpinned by research evidence.”⁴⁹ Phonics research is increasingly matched with commercial programs spawning an international cottage and corporate industry. Research has tied past government mandates of commercial programs to inappropriate financial interests littered with conflicts of interest^{50, 51} leading researchers to examine the ethics and the fragile relationship between research, policy, practice, and government intervention.⁵²

We agree that an inability to read presents a crisis for children who struggle, and their families.⁵³ The complexity of learning to read demands that we make complementary efforts^{54, 55} through an inclusive portfolio⁵⁶ that views phonics as *a necessary but insufficient* component in unlocking the transition to reading. Readers must gain all of the important knowledges of “vocabulary, complex syntax, text structures concepts and general knowledge that comes from wide reading^{57, 58}. A reconciliatory view of the historic debates in the field⁵⁹ cautions against overcorrection (adopting singular solutions and prohibiting other approaches); in favour of taking a ‘both/and’ approach. We applaud the report’s recommendation to set up an assessment and intervention infrastructure. Western’s annual course and program planning will attend to the recommendations from the *Ontario Ministry of Education* and the *Ontario College of Teachers*. And we will include knowledge and strategies -grounded in research - that serve most of our Teacher Candidates well as they enter the classroom to work with all children and youth.

Western Recommendations

Faculties, Teachers and Schools are continually called upon to respond to new knowledge, demographic changes, new forms of work, youth pathways, technologies, and planning for a post-pandemic culture and so on. Contrary to the OHRC claims, Canada’s record on reading performance of students (Ontario 2nd) is among the top performers globally.⁶⁰ At Western, we work closely with our Board partners and engage in ongoing annual programmatic research to ensure our courses are responsive to new research. Additional funding^{61, 62} would allow us to expand on these efforts by *reinstating* the *Teaching Literacy in Kindergarten* course or doubling the length of the mandatory *Teaching Reading to Struggling Readers* course we have offered since 2015⁶³ (the mandatory expansion of the B.Ed program to two years came with a *decrease of approximately 30% in government funding*). We are committed to bringing knowledges and practices from all relevant research to support struggling readers, as we do for all students. We would add:

- **Invest** in support for families through early literacy^{64, 65} family programs⁶⁶ to support school success⁶⁷;
- **Maintain** the focus of concern on all struggling readers, not only those with dyslexia;
- **Build** on the strengths of teachers whose concern is for all students, including all struggling readers⁶⁸.
- **Strengthen** *Response to Intervention* approaches including appropriate use of early screening efforts, adequately resourced in-school intensive instruction as imperfect tools⁶⁹ in support of classroom programming^{70, 71}. Invest in sufficient staffing of qualified teachers to staff Tier 1 and Tier 2 specialist staff support in schools⁷²;
- **Remove** thresholds that create unnecessary barriers to service; daily classroom assessments by educated professional teachers can inform the need for support but pathways to those supports must be available.
- **Invest** in comprehensive and responsive ongoing professional development (beyond a single MOE focus) that supports teachers’ goals to develop knowledge critical to their work,⁷³ extending the positive reports of learning reported by Teacher candidates⁷⁴ especially where researchers and practitioners can be brought together⁷⁵.
- **Continue** inclusion of systematic phonics instruction^{76, 77, 78} that works on a continuum to ensure we are providing explicit direct instruction at the point in a child’s learning when it is most needed to develop all literacy skills including oral language, reading comprehension and writing. A helpful example is offered by Burkins and Yates, 2021.⁷⁹ Reduce and cap class sizes in the early years and primary grades to allow teachers to do this work well.
- **Attend** to Universal Design for Learning instruction that “promotes both short-term acquisition and long-term development in more complex aspects of literacy, and whether it is differentiated enough to reduce initial disparities without compromising the longer-term needs.”⁸⁰
- **Collaborate** with communities to develop culturally appropriate materials for students from non-Anglo-Canadian culture, including Indigenous students.
- **Do not mandate** specific commercial programs. Programs come and go, and they are too often tied up in the financial interests of businesses or individuals. Rather, work with teachers to critically select appropriate materials⁸¹ understanding the limitations of what they offer and how they may be used in a comprehensive program offering.

ENDNOTES

- ¹ United Nations Human Rights Convention on the Rights of the Child (1990) <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>
- ² (United Nations, 2005, p. 1)
- ³ (e.g., Calls for Justice in the Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019; Calls to Action of the Truth and Reconciliation Commission, 2015, Indigenous Languages Act, 2019, and the United Nations Declaration on the Rights of Indigenous Peoples, 2007)
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- ⁵ United Nations Educational, Scientific and Cultural Organization. (2021). *Reimagining our futures together: A new social contract for education*. <https://unesdoc.unesco.org/ark:/48223/pf0000379707>
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- ⁹ (International Literacy Association, 2020, p. 1)
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