
January 2025 Reading Audit Report

A report submitted in accordance with Minn. Laws 2024, chapter 109, article 4, Section 19

Contact Information

For more information about this report, please contact:

Michelle Sandler
Teacher Education Specialist
Professional Educator Licensing and Standards Board
1021 Bandana Blvd. E., Suite 222
St. Paul, MN 55108-5111
Michelle.Sandler@state.mn.us
mn.gov/pelsb

Table of Contents

JANUARY 2025 READING AUDIT REPORT	1
Contact Information	2
Table of Contents	3
Legislative Charge.....	4
History of Reading Requirements	4
Analysis of PELSB Reading Standards.....	5
Standard Alignment.....	5
Strengths of Reading Preparation Standards	18
Areas Where Statute Informs Interpretation of Rules	19
Established Program Approval Process.....	20
Integrating Reading Audit into Program Approval Process	20
Results of the Audit	22
Board Determinations	23
Next Steps	24

Legislative Charge

The Minnesota Professional Educator Licensing and Standards Board (PELSB) is submitting this report in accordance with Minn. Laws 2024, chapter 109, article 4, section 19.

These laws require PELSB to conduct an audit evaluating “whether and how” approved teacher preparation programs demonstrate the reading subject matter standards for the following programs:

- Early Childhood Education (Minnesota Rules, part 8710.3000)
- Elementary Education (Minnesota Rules, part 8710.3200)
- Special Education (Minnesota Rules, part 8710.5000)

Additionally, PELSB is required to report on:

- (1) The reading standards for each licensure area
- (2) Describing how the board conducted the audit
- (3) Identifying the results of the audit
- (4) Summarizing the program effectiveness reports for continuing approval related to the reading standards, including board determinations

History of Reading Requirements

Date	Update
2002	MN Statute 122A.06 required all teacher preparation programs to prepare candidates for "research-best practices in reading."
2005	MN Statute 122A.06 was updated. The Board of Teaching adopted reading standards for Elementary Education and established a Reading license.
2009	MN Statute 122A.06 was updated again to define fluency, phonemic awareness, phonics, reading comprehension, and vocabulary development and indicate that comprehensive,

	scientifically based reading instruction must include “effective, balanced instruction in all five areas.”
2010	<p>Reading standards for many licensure areas were updated to align to MN Statute 122A.06, including Early Childhood, Elementary Education, and Reading.</p> <p>Programs were updated to demonstrate the new standards, and reading reviewers verified that programs had sufficient learning opportunities and assessments aligned to the specific reading standards in the content area. Programs that failed to demonstrate updated standards were not approved.</p>
2013	<p>Special Education rules were changed to include the Elementary Education reading competencies in the Core Skills of Special Education, effectively making the reading standards the same for Early Childhood, Elementary Education, and Special Education.</p> <p>Special Education programs were submitted to demonstrate alignment to the new standards, which reading reviewers verified.</p>
2019	<p>MN Statute 122A.092 was updated to add requirements around instruction on dyslexia. Programs were submitted to PELSB to demonstrate compliance. Programs were able to resubmit to PELSB as needed to demonstrate compliance.</p>
2023	<p>PELSB began the Reading Audit process to ensure continued alignment to the 2010 and 2013 adopted standards and the 2019 dyslexia instruction requirements.</p>
Fall 2023	<p>The READ Act’s definition of “evidence-based practices” informed PELSB’s standards-level review and subsequent high-level audits.</p>

Analysis of PELSB Reading Standards

Standard Alignment

The Early Childhood, Elementary, and Special Education standards were adopted to align with the 2009 statutory changes for reading instruction. As seen in the table below, the first section of standards focuses on building knowledge of reading instruction, including all five components of reading: phonemic awareness, phonics, fluency, vocabulary, and comprehension. The second section centers on demonstrating instructional reading practices for all five components. The third section emphasizes

being able to use assessment to evaluate and inform reading instruction *and* requires that teacher candidates practice in a structured clinical experience aligned to the reading preparation work. The final section is integrative to support teachers to build an environment to foster literacy. The minor differences in the Early Childhood and Elementary standards are bolded and explained in the Statement of Need and Reasonableness: “teachers of children through grade 3 play a critical role in ensuring that these young children are able to read at grade level, and in cases where they are struggling, are able to administer assessments and provide appropriate interventions (Minnesota Board of Teaching, 2009). For these reasons, the Elementary and Early Childhood licenses were discussed together and the proposed rule changes are identical for both licensure fields.” Shortly thereafter, it was considered needed and reasonable to adopt the same standards for all special education licenses “to ensure that all special education teacher candidates will receive deep preparation in the area of reading.” (Minnesota Board of Teaching, 2011)

Additionally, since rulemaking on the reading standards has not been done since the dyslexia instruction statute was added (Minnesota Statutes 2019, section 122A.092, subdivision 5c), programs have demonstrated alignment to the statutory requirements as written.

Alignment to Minnesota Statutes 2024, 122A.092, subdivision 5	Early Childhood Standards, Minnesota Rules, part 8710.3000, Subpart	Elementary and Special Education Core, Minnesota Rules, part 8710.3200, Subpart
	3.E. A teacher of young children in the primary grades must have knowledge of the foundations of reading processes, development, and instruction, including:	3.C. A teacher of children in kindergarten through grade 6 must have knowledge of the foundations of reading processes, development, and instruction, including:
Oral language, phonemic awareness, phonics, fluency, vocabulary, comprehension, using students’	3.E.1. oral and written language development, including:	3.C.1 oral and written language development, including:
	3.E.1.a: relationships among reading, writing, and oral language and the interdependent nature of reading, writing, listening, and speaking to promote reading proficiency;	3.C.1.a: relationships among reading, writing, and oral language and the interdependent nature of reading, writing, listening, and speaking to promote reading proficiency;

native language as a resource	3.E.1.b: the use of formal and informal oral language and writing opportunities across the curriculum to help students make connections between their oral language and reading and writing, particularly English learners; and	3.C.1.b: the use of formal and informal oral language and writing opportunities across the curriculum to help students make connections between oral language and reading and writing, particularly in English language learners; and
	3.E.1.c : the interrelated elements of language arts instruction that support the reading development of English learners, including ways in which the writing systems of other languages may differ from English and factors and processes involved in transferring literacy competencies from one language to another;	3.C.1.c.: the interrelated elements of language arts instruction that support the reading development of English language learners, including ways in which the writing systems of other languages may differ from English and factors and processes involved in transferring literacy competencies from one language to another.
Phonemic awareness, structured literacy	3.E.2. phonological and phonemic awareness, including:	3.C.2. phonological and phonemic awareness, including:
	3.E.2.a. the phonemes that make up the English language;	3.C.2.a. the phonemes that make up the English language;
	3.E.2.b. the ways in which reading achievement is related to phonological and phonemic awareness, including the ability to recognize word boundaries; to rhyme; and to blend, segment, substitute, and delete sounds in words; and	3.C.2.b. the ways in which reading achievement is related to phonological and phonemic awareness, including the ability to recognize word boundaries, to rhyme, and to blend, segment, substitute, and delete sounds in words; and
	3.E.2.c. - the instructional progression of phonological awareness, for example, words, syllables, onsets and rimes, and phonemes;	3.C.2.c. the instructional progression of phonological awareness, for example, words, syllables, onsets and rimes, and phonemes;

Phonics, structured literacy	3.E.3. concepts about print, including:	3.C.3. concepts about print, including:
	3.E.3.a. knowledge about how letters, words, and sentences are represented in written English;	3.C.3.a. knowledge about how letters, words, and sentences are represented in written English;
	3.E.3.b. the importance of teaching uppercase and lowercase letter recognition and formation; and	3.C.3.b. the importance of teaching uppercase and lowercase letter recognition and formation; and
	3.E.3.c. the instructional progression of the alphabetic principle;	3.C.3.c. the instructional progression of the alphabetic principle;
Phonics, fluency, structured literacy	3.E.4. phonics and other word identification strategies and fluency, including:	3.C.4. phonics and other word identification strategies and fluency, including:
	3.E.4.a. systematic, explicit phonics instruction that is sequenced according to the increasing complexity of linguistic units;	3.C.4.a. systematic, explicit phonics instruction that is sequenced according to the increasing complexity of linguistic units;
	3.E.4.b. word identification strategies and common, irregular sight words;	3.C.4.b. word identification strategies and common, irregular sight words;
	3.E.4.c. the stages of spelling development and systematic planning for spelling instruction related to the stages of spelling development;	3.C.4.c. the stages of spelling development and systematic planning for spelling instruction related to the stages of spelling development;
	3.E.4.d. how the etymology and morphology of words relate to orthographic patterns in English; and	3.C.4.d. how the etymology and morphology of words relate to orthographic patterns in English; and

Fluency	3.E.4.e. the development of reading fluency;	3.C.4.e. the development of reading fluency;
Vocabulary, structured literacy	3.E.5. knowledge of how to develop vocabulary knowledge, including:	3.C.5. knowledge of how to develop vocabulary knowledge, including:
	3.E.5.a. understanding the critical role vocabulary knowledge plays in reading;	3.C.5.a. understanding the critical role vocabulary knowledge plays in reading;
	3.E.5.b. how to provide explicit instruction in vocabulary development and how to determine the meaning and accurate use of unfamiliar words encountered through listening and reading; and	3.C.5.b. how to provide explicit instruction in vocabulary development and how to determine the meaning and accurate use of unfamiliar words encountered through listening and reading; and
	3.E.5.c. how to provide opportunities to engage in early and continual language experiences to increase vocabulary by modeling and explicitly teaching students a variety of strategies for gaining meaning from unfamiliar words;	3.C.5.c. how to provide opportunities to engage in early and continual language experiences to increase vocabulary by modeling and explicitly teaching students a variety of strategies for gaining meaning from unfamiliar words;
Comprehension, structured literacy	3.E.6. comprehension processes related to reading, including:	3.C.6. comprehension processes related to reading, including:
	3.E.6.a. knowledge of how proficient readers read, how to facilitate listening comprehension, and how to develop comprehension of print material;	3.C.6.a. knowledge of how proficient readers read, how to facilitate listening comprehension, and how to develop comprehension of print material;
	3.E.6.b. the levels of comprehension, how to explicitly teach and provide guided practice in comprehension skills and strategies; and	3.C.6.b. the levels of comprehension, how to explicitly teach and provide guided practice in comprehension skills and strategies; and

	3.E.6.c. how to facilitate comprehension at various stages of reading development by selecting and using a range of texts, activities, and strategies before, during, and after reading;	3.C.6.c. how to facilitate comprehension at various stages of reading development by selecting and using a range of texts, activities, and strategies before, during, and after reading;
Comprehension	3.E.7. content-area literacy, including:	3.C.7. content-area literacy, including:
	3.E.7.a. knowledge of reading comprehension processes necessary to comprehend different types of informational materials and content-area texts; and	3.C.7.a. knowledge of reading comprehension processes necessary to comprehend different types of informational materials and content-area texts; and
	3.E.7.b. the structures and features of expository (informational) texts and effective reading strategies to address different text structures and purposes for reading;	3.C.7.b. the structures and features of expository (informational) texts and effective reading strategies to address different text structures and purposes for reading;
	3.E.8. literary response and analysis, including:	3.C.8. literary response and analysis, including:
	3.E.8.a. knowledge of how to provide frequent opportunities to listen to and read high-quality literature for different purposes	3.C.8.a. knowledge of how to provide frequent opportunities to listen to and read high-quality literature for different purposes
	3.E.8.b. knowledge of how to select, evaluate, and respond to literature from a range of genres, eras, perspectives, and cultures; and	3.C.8.b. knowledge of how to select, evaluate, and respond to literature from a range of genres, eras, perspectives, and cultures; and
	3.E.8.c. knowledge of how to analyze and teach literary text structures and	3.C.8.c. knowledge of how to analyze and teach literary text structures and

	elements and criticism drawing upon literature and instructional needs and interests; and	elements and criticism drawing upon literature and instructional needs and interests; and
Comprehension	3.E.9. structure of the English language, including:	3.C.9. structure of the English language, including:
	3.E.9.a. basic knowledge of English conventions and the structure of the English language (sentence structure, grammar, punctuation, capitalization, spelling, syntax, and semantics);	3.C.9.a. basic knowledge of English conventions and the structure of the English language (sentence structure, grammar, punctuation, capitalization, spelling, syntax, and semantics);
	3.E.9.b. knowledge of how to enhance literacy skills including helping students understand similarities and differences between language structures used in spoken and written English;	3.C.9.b. knowledge of how to enhance literacy skills including helping students understand similarities and differences between language structures used in spoken and written English;
Oral language, comprehension	3.E.9.c. basic knowledge of English syntax and semantics and the ability to use this knowledge to improve reading competence including how to help students interpret and apply English grammar and language conventions in authentic reading, writing, listening, and speaking contexts; and	3.C.9.c. basic knowledge of English syntax and semantics and the ability to use this knowledge to improve reading competence including how to help students interpret and apply English grammar and language conventions in authentic reading, writing, listening, and speaking contexts; and
Fluency, Comprehension	3.E.9.d. knowledge of how to help students consolidate knowledge of English grammar and improve reading fluency and comprehension by providing frequent opportunities to listen to, read, and reread materials.	3.C.9.d. knowledge of how to help students consolidate knowledge of English grammar and improve reading fluency and comprehension by providing frequent opportunities to listen to, read, and reread materials.
	3.F. A teacher of young children in the primary grades must have knowledge	3.D. A teacher of children in kindergarten through grade 6 must

	of and ability to use a wide range of instructional practices, approaches, methods, and curriculum materials to support reading instruction, including:	have knowledge of and ability to use a wide range of instructional practices, approaches, methods, and curriculum materials to support reading instruction, including:
Structured literacy	3.F.1. appropriate, motivating instruction, both explicit and implicit, in:	3.D.1. appropriate, motivating instruction, both explicit and implicit, in:
Oral language	3.F.1.a. oral language development;	3.D.1.a. oral language development;
Phonemic awareness	3.F.1.b. auditory awareness, discrimination of sounds, phonemic awareness, and word awareness;	3.D.1.b. auditory awareness, discrimination of sounds, phonemic awareness, and word awareness;
Phonics, fluency	3.F.1.c. the teaching of phonics, sight words, spelling, and fluency, including the selection, design, and use of instructional programs, materials, texts, and activities; and	3.D.1.c. the teaching of phonics, sight words, spelling, and fluency, including the selection, design, and use of instructional programs, materials, texts, and activities; and
Comprehension	3.F.1.d. applying a variety of reading comprehension strategies to different types of informational materials and content-area texts including teaching the structures and features of expository texts;	3.D.1.d. applying a variety of reading comprehension strategies to different types of informational materials and content-area texts including teaching the structures and features of expository texts;
	3.F.2. selection, design, and use of appropriate and engaging instructional strategies, activities, and materials, including:	3.D.2. selection, design, and use of appropriate and engaging instructional strategies, activities, and materials, including:
Phonics	3.F.2.a. multisensory techniques to ensure that students learn concepts	3.D.2.a. multisensory techniques to ensure that students learn concepts

	about print including how to recognize and write letters;	about print including how to recognize and write letters;
Vocabulary	3.F.2.b. teaching vocabulary using a range of instructional activities to extend students' understanding of words;	3.D.2.b. teaching vocabulary using a range of instructional activities to extend students' understanding of words;
Comprehension	3.F.2.c. teaching comprehension skills and strategies, including opportunities for guided and independent work;	3.D.2.c. teaching comprehension skills and strategies, including opportunities for guided and independent work;
Comprehension	3.F.3. selection and appropriate use of a wide range of engaging texts representing various genres and cultures when designing reading lessons; the ability to facilitate and develop students' responses to literature and critical reading abilities through high level, interactive discussions about texts;	3.D.3. selection and appropriate use of a wide range of engaging texts representing various genres and cultures when designing reading lessons; the ability to facilitate and develop students' responses to literature and critical reading abilities through high level, interactive discussions about texts;
Comprehension	3.F.4. selection and appropriate explicit instruction and guided practice to teach written-language structures using a range of approaches and activities to develop the students' facility to comprehend and use academic language;	3.D.4. selection and appropriate explicit instruction and guided practice to teach written-language structures using a range of approaches and activities to develop the students' facility to comprehend and use academic language;
Structured literacy, phonemic awareness, phonics, fluency,	3.F.5. development of a literacy framework to coherently organize reading programs and effectively implement lessons, including a variety of grouping strategies, guided practice, and independent work; and	3.D.5. development of a literacy framework to coherently organize reading programs and effectively implement lessons, including a variety of grouping strategies, guided practice, and independent work; and

vocabulary, comprehension, oral language	3.F.6. the ability to design purposeful lessons and tasks based on the qualities, structures, and difficulty of texts and the reading needs of individual students, including the selection and use of supplementary materials to support the reading development of struggling and gifted readers.	3.D.6. the ability to design purposeful lessons and tasks based on the qualities, structures, and difficulty of texts and the reading needs of individual students, including the selection and use of supplementary materials to support the reading development of struggling and gifted readers.
Multitiered system of support, universal screeners, progress monitoring	3.G. A teacher of young children in the primary grades must have knowledge of and ability to use a variety of assessment tools and practices to plan and evaluate effective reading instruction, including:	3.E. A teacher of children in kindergarten through grade 6 must have knowledge of and ability to use a variety of assessment tools and practices to plan and evaluate effective reading instruction, including:
	3.G.1. formal and informal tools to assess students':	3.E.1. formal and informal tools to assess students':
Oral language assessment	3.G.1.a. oral and written language development;	3.E.1.a. oral and written language development;
Phonemic awareness assessment	3.G.1.b. auditory awareness, discrimination of sounds, and phonological and phonemic awareness;	3.E.1.b. auditory awareness, discrimination of sounds, and phonological and phonemic awareness;
Phonics assessment	3.G.1.c. understanding of concepts about print and the alphabetic principle;	3.E.1.c. understanding of concepts about print and the alphabetic principle;
Phonics and fluency assessment	3.G.1.d. knowledge of and skills in applying phonics and other word identification strategies, spelling strategies, and fluency	3.E.1.d. knowledge of and skills in applying phonics and other word identification strategies, spelling strategies, and fluency

Vocabulary assessment	3.G.1.e. vocabulary knowledge in relation to specific reading needs and texts;	3.E.1.e. vocabulary knowledge in relation to specific reading needs and texts;
Comprehension assessment	3.G.1.f. comprehension of narrative and expository texts and the use of comprehension strategies, including determining independent, instructional, and frustration reading levels;	3.E.1.f. comprehension of narrative and expository texts and the use of comprehension strategies, including determining independent, instructional, and frustration reading levels;
	3.G.1.g. comprehension in content-area reading;	3.E.1.g. comprehension in content-area reading;
	3.G.1.h. the ability to evaluate and respond to a range of literature and analyze text structures and elements; and	3.E.1.h. the ability to evaluate and respond to a range of literature and analyze text structures and elements; and
Phonemic awareness, phonics, fluency, vocabulary, comprehension, and oral language assessment, multitiered system of support, progress monitoring	3.G.2. formal and informal tools to:	3.E.2. formal and informal tools to:
	3.G.2.a. plan, evaluate, and differentiate instruction to meet the needs of students from various cognitive, linguistic, and cultural backgrounds; and	3.E.2.a. plan, evaluate, and differentiate instruction to meet the needs of students from various cognitive, linguistic, and cultural backgrounds; and
	3.G.2.b. design and implement appropriate classroom interventions for struggling readers and enrichment programs for gifted readers;	3.E.2.b. design and implement appropriate classroom interventions for struggling readers and enrichment programs for gifted readers;
	3.G.3. the ability to work with reading specialists, gifted and talented specialists, and other staff on advanced intervention and enrichment programs;	3.E.3. the ability to work with reading specialists, gifted and talented specialists, and other staff on advanced intervention and enrichment programs;

	3.G.4. the ability to communicate results of assessments to specific individuals in accurate and coherent ways that indicate how the results might impact student achievement;	3.E.4. the ability to communicate results of assessments to specific individuals in accurate and coherent ways that indicate how the results might impact student achievement;
	3.G.5 : - the ability to administer selected assessments and analyze and use data to plan instruction through a structured clinical experience linked to university reading course work; and	3.E.5 : - the ability to administer selected assessments and analyze and use data to plan instruction through a structured clinical experience linked to university reading course work; and
	3.H. A teacher of young children in the primary grades must have the ability to create a literate and motivating environment that fosters reading by integrating foundational knowledge, use of instructional practices, approaches and methods, curriculum materials, and the appropriate use of assessments, including:	3.F. A teacher of children in kindergarten through grade 6 must have the ability to create a literate and motivating environment that fosters reading by integrating foundational knowledge, use of instructional practices, approaches and methods, curriculum materials, and the appropriate use of assessments, including:
Phonemic awareness, phonics, fluency, vocabulary, comprehension, using students' native language as a resource	3.H.1. knowledge of how to use interests, reading abilities, and backgrounds as foundations for the reading program and provide authentic reasons to read and write;	3.F.1. knowledge of how to use interests, reading abilities, and backgrounds as foundations for the reading program and provide authentic reasons to read and write;
	3.H.2. the ability to support students and colleagues in the selection or design of materials that match reading levels, interests, cultural, and linguistic backgrounds;	3.F.2. the ability to support students and colleagues in the selection or design of materials that match reading levels, interests, cultural, and linguistic backgrounds;
Structured literacy,	3.H.3. the development and implementation of classroom and	3.F.3. the development and implementation of classroom and

phonemic awareness, phonics, fluency, vocabulary, comprehension	schoolwide organizational structures that include explicit instruction, guided practice, independent reading, interactive talk, opportunities for response, and reading and writing across the curriculum;	schoolwide organizational structures that include explicit instruction, guided practice, independent reading, interactive talk, opportunities for response, and reading and writing across the curriculum;
Phonemic awareness, phonics, fluency, vocabulary, comprehension	3.H.4. the ability to create and maintain a motivating classroom and school environment and teacher and student interactions that promote ongoing engagement and literacy for all students;	3.F.4. the ability to create and maintain a motivating classroom and school environment and teacher and student interactions that promote ongoing engagement and literacy for all students;
Structured literacy, phonemic awareness, phonics, fluency, vocabulary, comprehension	3.H.5. the ability to foster independence and self-efficacy in readers;	3.F.5. the ability to foster independence and self-efficacy in readers;
	3.H.6. the development of independent reading by encouraging and guiding students in selecting independent reading materials, promoting extensive independent reading by providing daily opportunities for self-selected reading and frequent opportunities for sharing what is read; and motivating students to read independently by regularly reading aloud and providing access to a variety of reading materials; and	3.F.6. the development of independent reading by encouraging and guiding students in selecting independent reading materials, promoting extensive independent reading by providing daily opportunities for self-selected reading and frequent opportunities for sharing what is read; and motivating students to read independently by regularly reading aloud and providing access to a variety of reading materials; and
Using students' native languages as a resource, phonemic awareness, phonics, fluency,	3.H.7. the use of a variety of strategies to motivate students to read at home; encourage and provide support for parents or guardians to read to their children, in English or in the primary languages of English learners; and to	3.F.7 the use of a variety of strategies to motivate students to read at home; encourage and provide support for parents or guardians to read to their children, in English or in the primary languages of English learners; and to

vocabulary, comprehension	use additional strategies to promote literacy in the home.	use additional strategies to promote literacy in the home.
Minnesota Statutes 2024, 122A.092, Subd. 5(c)	Minnesota Statutes 2019, section 122A.092, Subdivision 5 (c) Instruction on dyslexia must be modeled on practice standards of the International Dyslexia Association, and must address:	
	(1) the nature and symptoms of dyslexia;	
	(2) resources available for students who show characteristics of dyslexia;	
	(3) evidence-based instructional strategies for students who show characteristics of dyslexia, including the structured literacy approach; and	
	(4) outcomes of intervention and lack of intervention for students who show characteristics of dyslexia.	

Strengths of Reading Preparation Standards

Minnesota is one of eighteen Path Forward states, for which goals include transforming the curriculum and delivery of early literacy instruction by embedding the science of reading into teacher preparation and increasing accountability of education preparation programs (EPPs) for early literacy outcomes through changes in state regulations and/or legislative policies. As a Path Forward state, PELSB was able to get feedback from reading experts in other states on the quality of Minnesota’s reading standards. The feedback provided was all positive.

First, feedback from other Path Forward states noted that multiple standards feature the need to be systematic and explicit in reading instruction as it relates to different components of reading instruction.

- “instructional progression of phonological awareness” (Minnesota Rules, part 8710.3200, subpart 3, item C2c)
- “systematic, explicit phonics instruction that is sequenced according to the increasing complexity of linguistic units” (Minnesota Rules, part 8710.3200, subpart 3, item C4a).
- “how to provide explicit instruction in vocabulary development” (Minnesota Rules, part 8710.3200, subpart 3, item C5b).
- “how to explicitly teach and provide guided practice in comprehension skills and strategies” (Minnesota Rules, subpart 8710.3200, subpart 3, item C6b)

- “must have knowledge of and ability to use a wide range of instructional practices, approaches methods and curriculum materials to support reading instruction, including: appropriate, motivating instruction, both *explicit* and implicit, in: (a) oral language development, (b) auditory awareness, discrimination of sounds, phonemic awareness, and word awareness, (d) the teaching of phonics, sight words, spelling, and fluency, including the selection, design, and use of instructional programs, materials, texts and activities, (d) applying a variety of reading comprehension strategies to different types of informational materials and content-area texts including teaching the structures and features of expository texts” (Minnesota Rules 8710.3200, Subp. 3, item D(1))
- “Instruction on dyslexia must be modeled on practice standards of the International Dyslexia Association, and must address:” “(3): evidence-based instructional strategies for students who show characteristics of dyslexia, including the structured literacy approach” (Minnesota Statutes, 122A.092, Subd. 5c(3))

Additionally, the reading standards include elements that support student reading that are sometimes overlooked. For example, with what is often a heavy focus on fiction in elementary education, there are many standards that support teacher candidates to teach expository texts.

Furthermore, the reading standards also support teacher candidates to meet learners’ different needs. There are standards emphasizing supporting multilingual learners and designing instruction for both struggling and gifted readers. Reading standards also include incorporating culturally responsive instruction.

While not noted by feedback provided, another strength is a standard requiring a “structured clinical experience linked to [teacher preparation instruction] reading course work” (Minnesota Rules, 8710.3200, Subp. 3, item E5).

Separately, in March 2024, NCTQ rated Minnesota’s Elementary teacher preparation standards as “strong” in that the standards are “specific” and “detailed” for all five core reading components,” incorporate how to teach struggling readers, including those with dyslexia, and include how to teach reading to English Learners in the reading standards for teacher preparation programs (National Council on Teacher Quality, 2025).

Areas Where Statute Informs Interpretation of Rules

The READ Act requires that practices are evidence-based where rules are overly broad. For instance, there is the standard that teacher candidates have the “ability to use a wide range of instructional practices.” Reviewers are trained, however, that the wide range of instructional practices must align with evidence-based practices as defined by statute.

Established Program Approval Process

For initial PELSB program approval, Elementary, Early Childhood, Special Education, and Reading programs must demonstrate that their programs have learning opportunities and assessments aligning to all the license-specific standards, including the reading standards. Trained reading experts evaluate each program application's alignment to the reading standards.

Programs are audited every three years for compliance and evidence of effectiveness through the continuing approval process. There are staggered submissions such that about 1/3 of programs seek continuing approval each year. Through this established process, in the spring of 2022, 9 programs from 3 institutions were flagged for lack of evidence demonstrating alignment to the PELSB standards; these programs were required to submit interim reports with plans for updating reading instruction and subsequent submissions of updated syllabi with greater detail around learning opportunities and assessments demonstrating knowledge and application of the standards.

NCTQ found that Minnesota's program approval process is "strong." This finding was based on Minnesota's use of reading specialists in reviewing reading instruction, reviewing syllabi as part of the program renewal process, and maintaining authority of program approval (National Council on Teacher Quality, 2025).

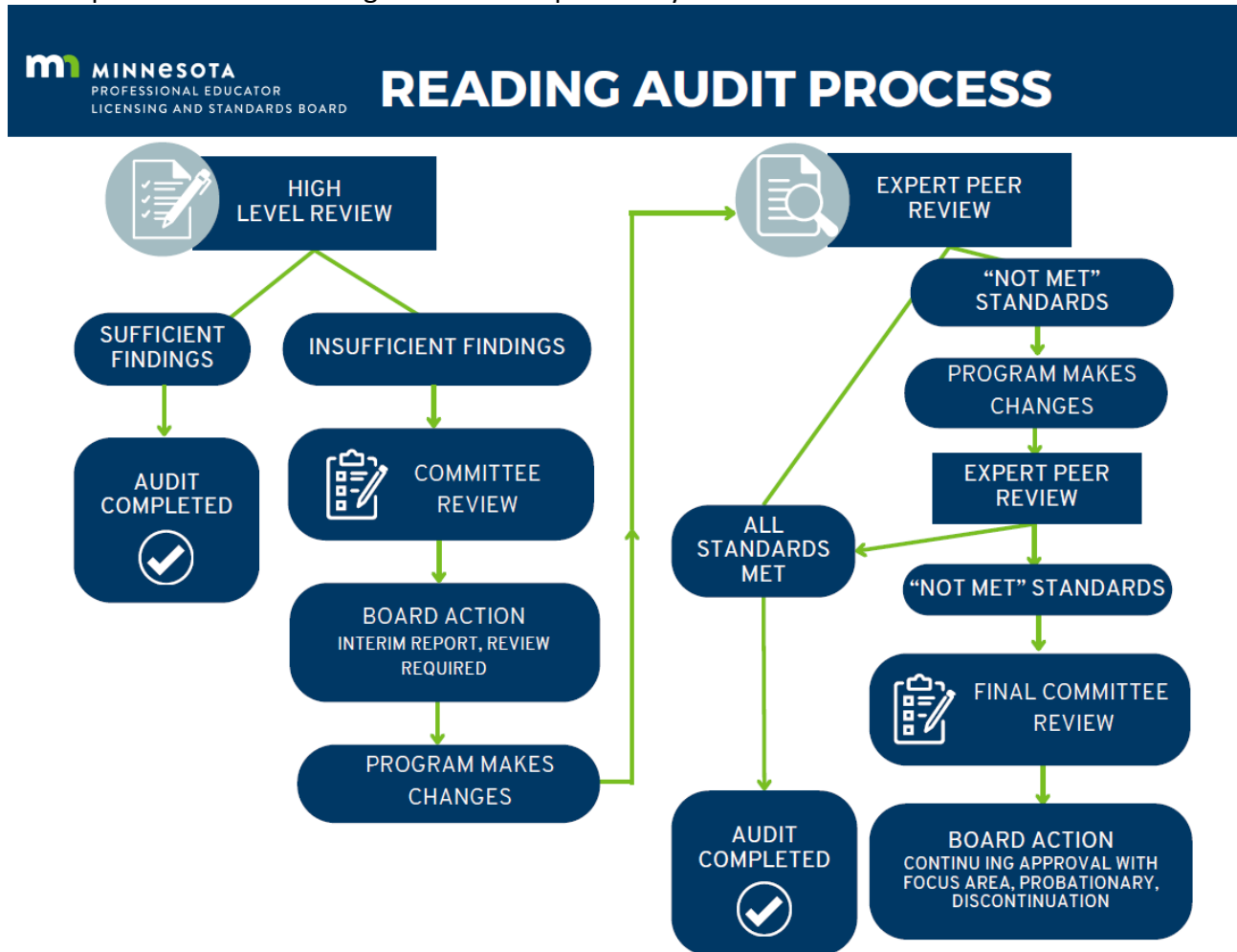
Integrating Reading Audit into Program Approval Process

In January 2023, PELSB began a three-year formal audit process as a universal scan of reading across Elementary Education, Early Childhood, Special Education, and Reading programs. All these programs seeking continuing program approval received a high-level review indicating alignment to evidence-based practices, dyslexia instruction requirements, and the five pillars of reading. This high-level reading audit was a first step to fulfill PELSB's statutory obligations to ensure all programs are in compliance with MN Statute 122A.092, Subd. 5 and the corresponding PELSB subject matter rules.

For the Elementary, Early Childhood, and Special Education programs, [the high level audit \(2023\)](#) was aligned to the knowledge level of five pillars of reading, application of the five pillars of reading, and the dyslexia requirements in Statute. Again, this was chosen to align to both the statute and the corresponding reading standards. The [high level audit form](#) was updated to be support program revision in the spring of 2024. The table in the Standards Analysis section of this report indicates how the pillars align to the reading standards that are in the Elementary, Early Childhood, and Special Education programs. Based on the recency of the Dyslexia statute, corresponding reading standards do not yet exist, so the audit reviewed programs based on the statutory language.

Based on the deeper level of skills and knowledge required by the Teacher of Reading licensure standards (MN Rule 8710.4725), the high level audit of Reading programs is based on the headers of the Reading Teacher licensure standards in addition to the four dyslexia requirements. These headers include: A. knowledge of the foundations of reading processes and instruction, B. Able to use a wide range of instructional practices, approaches, methods, and curriculum materials to support reading

instruction, C. Able to use a variety of assessment tools and practices to plan and evaluate effective reading instruction, D. Able to create a literate environment that fosters reading by integrating foundational knowledge, use of instructional practices, approaches and methods, curriculum materials, and the appropriate use of assessments, and E. A teacher of reading must view professional development as a career-long effort and responsibility.



The “Reading Audit Process” flowchart indicates the Board’s actions based on reviewer findings. When the high-level review has found that syllabi or other similar program documentation demonstrate alignment to evidence-based practices, the five pillars of reading, and the dyslexia instruction requirements, the Board has granted program approval with no requirements of additional standards-level review. When, however, the high-level review finds concerns related to those elements, the Board has required standards-level review in alignment with the gaps. Programs that need standards-level review are provided feedback on the nature of the misalignment or missing evidence and are strongly encouraged to make changes prior to resubmitting for standards-level review. After a standards-level review, programs have the opportunity to make more changes for a second standards-level review. Within the second review, the programs have opportunities to clarify learning opportunities and assessments to demonstrate to reading reviewers that the standards are met. If standards were still not demonstrated after two reviews, a recommendation of program approval is

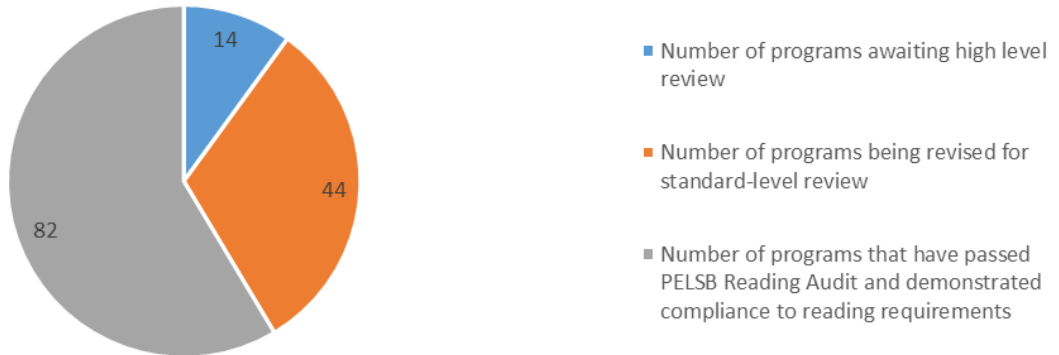
made by the Program Review Panel, made up of members from the Minnesota Association of Colleges for Teacher Education, Education Minnesota, and varying types of teacher preparation and teacher advocacy organization; this recommendation is made based on the number and severity of the “not met” standards and the Board’s Teacher Preparation Committee reviews all of these recommendations before they go to the Board for action.

Results of the Audit

As of January 17, 2025, there are 140 PELS-approved Early Childhood, Elementary, Special Education, and Reading programs approved programs.

Programs	Number of Approved Programs	Number of programs awaiting high level review	Number of programs being revised for standard-level review	Number of programs that have passed Reading Audit by demonstrating alignment to reading requirements
Elementary	39	5	17	17
Early Childhood	14	2	9	3
Special Education	77	3	12	62
Reading	10	4	5	1
All	140	14	43	82

PELSB Reading Audit Status for Elementary, Early Childhood, Special Education, and Reading Programs



Board Determinations

The Program Review Panel and the Board’s Teacher Preparation Committee considered the findings of the external reviews. When making determinations of whether to require an interim report or move a program to probation, the recommending bodies and Board considered the nature and severity of the not met standards and the impact those not met standards would have on teacher candidates and their students.

There are many programs for which the Board has not yet acted based on timing or other program approval process needs. The following table excludes programs that have demonstrated standards but for which additional elements of program need review. The following table also excludes programs that have not had a high level review and those that have had a high level review but where the Board has not yet acted.

Program Status	Number of Early Childhood, Special Education, Elementary and Reading Programs
Initial or continuing approval after having passed reading audit, including programs that previously had interim reports for reading and programs that were on probation but have since demonstrated standards	53
Moved from probationary approval to continuing approval by demonstrating standards	3

Probationary approval with “not met” reading standards	11
Continuing approval with focus and an interim report to address reading standards	46
Voluntarily discontinued since January 2023	7

Next Steps

The Board would like to highlight the Reading Audit process as a first step in ensuring teacher preparation’s compliance with the READ Act and PELSB reading standards. The Board plans on completing the last year of the high-level audit in 2025 and any subsequent work required to ensure syllabi alignment to standards in 2026.

The Board plans on adopting a program evaluation tool that can be used on an ongoing basis to assess and support programs that prepare teachers of reading (Elementary, Special Education, Early Childhood, Reading). Key priorities for this tool will be alignment to the reading standards, support for continuous improvement, and ability to monitor effectiveness.

One outcome of Minnesota’s Path Forward work is additional funding by the JAB Foundation to create a rubric to support the evaluation of teacher preparation.

In a current draft rubric, faculty from the University of Minnesota, Minnesota State, and private colleges along with K-12 literacy specialists have collaborated to write key components. The draft rubric includes findings to align with PELSB rule: “meets”, “meets with concern”, and “does not meet.” Additionally, to go beyond rule and become a leader for other states, there’s also an “exemplary” category requiring application in P-12 schools. The rubric aligns to the reading subject matter standards to include how children learn to read, components of literacy instruction (phonemic awareness, phonics, fluency, vocabulary, oral language, background knowledge, comprehension, genre/text structure, language structure/syntax, and writing development), assessments and data use, fostering a literacy environment, meeting individual needs, and providing literacy clinical experiences. Every element of the draft rubric is also grounded in reading research, reading instruction research, teacher preparation research, and program evaluation and assessment research.

Within the development process, expert feedback has been sought and incorporated and that will continue to be done. Throughout, the rubric has been informed by the needs and experiences of P-12 by including P-12 literacy specialists. There are also faculty with both special education and elementary education backgrounds. Dr. Kamarrie Coleman, evaluation specialist from ACET inc, has supported the work. Feedback has been provided by Dr. Gregory Carl Hutchings, Jr, a nationally recognized educational leader, antiracism activist, and published author. The group has plans to have a draft ready by the end of March to get feedback from other

Path Forward states, including faculty and state education leaders in North and South Dakota and Idaho. Additionally, there are plans to get feedback from other reading and teacher preparation experts. There is also work being done with a national Professional Learning Community focusing on indigenous learners to ensure the indigenous perspective is sought and reflected in the rubric.

Another step in the development process is to create specific indicators. This work will support inter-rater reliability and can be done in the summer of 2025.

One of the final development steps will be to pilot the tool in the 2025-2026 academic year. There will be private funds available for teacher preparation programs to receive coaching.

PELSB plans to be able to implement the evaluation tool on a rolling basis as early as the fall of 2026. PELSB plans to include the tool in the existing unit approval process for teacher preparation providers.