

THE MILLER-UNRUH READING PROGRAM:  
A SUNSET REVIEW

DECEMBER 1986

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## INTRODUCTION

This report is submitted pursuant to the "sunset" review procedures enacted by Chapter 1270, Statutes of 1983 (Senate Bill 1155), and reports our findings and recommendations regarding the Miller-Unruh Basic Reading Program. This program was established to help prevent and correct reading disabilities among children in kindergarten and grades 1 through 3.

Chapter 1270 provided for the termination of the Miller-Unruh Program on June 30, 1986. Chapter 1318, Statutes of 1984 (Senate Bill 1858), which became operative on January 1, 1985, extended the sunset date to June 30, 1987.

As part of the sunset process, Chapter 1270 requires the State Department of Education (SDE) to review the Miller-Unruh program and submit its findings to the Legislature by September 15, 1985. The department submitted its report in March 1986. Chapter 1270 also requires the Legislative Analyst to review the department's report and submit her own findings, comments, and recommendations regarding the program to the Legislature.

Specifically, Chapter 1270 requires the SDE and the Legislative Analyst to address as many of the following issues as possible:

- (1) The appropriateness of identification formulas used to determine which children have special needs.
- (2) The appropriateness of formulas used to allocate funds and the adequacy of funding levels for the program.
- (3) The effectiveness of the program.
- (4) The appropriateness of local control.

(5) The appropriateness of state involvement in monitoring, reviewing, and auditing to assure that funds are being used efficiently, economically, and legally.

(6) The appropriateness of amounts spent to administer the program.

(7) The appropriateness of having the SDE administer the program.

(8) The interrelationships among state and federal categorical programs providing this type of assistance.

(9) The characteristics of the target population being served by the program.

(10) The need for the program.

(11) The purpose and intent of the program.

The law also requires that the report submitted by the SDE include, but not be limited to, all of the following topics:

(1) A description of the program, including a description of how the program is administered at the state and local levels.

(2) The history of the program and previous legislative action.

(3) Relevant statistical data.

(4) Related federal programs.

(5) Whether there is an unmet need for the intended purposes of the program and, if any, an estimated cost of serving the unmet need.

(6) Findings regarding the program, including comments on whether any identified problems are implementation issues, or issues that require revision of law or regulations.

(7) Recommendations of ways to improve the program while maintaining its basic purposes.

Chapter I of this report provides background information on the

Miller-Unruh program, a summary of the SDE's recommendations, and our comments on those recommendations. Chapter II contains our findings, and Chapter III contains our recommendations, which are based upon both our own and the SDE's findings regarding the Miller-Unruh reading program.

This report, as specified by law, is based largely on our review of the SDE report. Some information that is provided in the SDE report, such as the legislative history of the Miller-Unruh program, is not repeated here. We suggest, therefore, that this report be read in conjunction with the SDE report in order to obtain a more complete understanding of the program and of our comments on the SDE's findings and recommendations.

This report was prepared by Rick Pratt under the supervision of Ray Reinhard.

## EXECUTIVE SUMMARY

### I. LEGISLATIVE ANALYST'S FINDINGS

- o The Miller-Unruh Basic Reading Act was enacted in 1965 and most recently reauthorized by Chapter 749, Statutes of 1981 (Senate Bill 906). The program provides a state subsidy for specified reading specialist positions in order to provide additional personnel to help prevent and correct "reading disabilities at the earliest possible time in the educational career of the pupil."
- o Only eight of the 20 largest districts in California participate in the program. Among the large districts that do not participate are: Los Angeles, San Francisco, Long Beach, Oakland, Sacramento, and San Jose.
- o As implemented by the State Department of Education (SDE), the Miller-Unruh program has not focused on the original objective of preventing and correcting reading disabilities; instead, the program has been directed toward improving the reading ability of below-average (though not necessarily disabled) readers.
- o In 1985-86, the Legislature appropriated \$19.3 million for the Miller-Unruh program. This amount was equal to about \$21,117 per state-subsidized specialist and \$235 per pupil served.
- o Although current law requires that funds be allocated to districts according to the percentage of pupils having reading difficulties and the ability of the district to pay for special instructional assistance, the SDE has not established a funding

system to implement this provision. Instead, the department gives first priority to districts that currently receive state funding, without regard to measures of district need. In addition, when districts discontinue their participation in the program, the department has, until the current year, used the funds that thereby become available to increase the state subsidy for the remaining specialists, rather than to fund new positions in new districts.

- o The SDE's practice of using excess funds to increase the subsidy for remaining positions rather than to add new positions has resulted in a 39 percent reduction in the number of pupils served despite a 39 percent increase in total program funding between 1976 and 1985.
- o Effective September 30, 1983, candidates for a Miller-Unruh position must have completed college or university courses in (1) the teaching of elementary school reading, (2) the teaching of elementary school language, (3) the diagnosis and remediation of reading disabilities, and (4) directed clinical practice in the remediation of reading disabilities. Specialists who were employed prior to the effective date of these requirements do not need to meet them. The SDE, however, does not know how many of the 913 current Miller-Unruh specialists lack the currently-required level of training.
- o The SDE has not developed a definition of "reading disability." Therefore, there are no measures of the incidence of reading disability among primary grade pupils in California, nor are

there any measures of the Miller-Unruh program's effectiveness in correcting and preventing reading disability. Finally, without a definition of reading disability, the department is unable to establish a standard of need that can be used to select participating districts and to allocate Miller-Unruh funds among them.

- o The SDE's sunset report on the Miller-Unruh program discusses only one of the 11 topics that are identified as optional in the sunset legislation and fails to discuss one of the six topics that are required by the legislation.

## II. LEGISLATIVE ANALYST'S RECOMMENDATIONS

We recommend that the Miller-Unruh Basic Reading Program be continued, with the current level of funding, provided the following recommendations are also adopted:

- o We recommend that the SDE develop a definition of "reading disability."
- o We recommend that the SDE develop rules and regulations to ensure that the Miller-Unruh program focuses on the prevention and correction of reading disabilities.
- o We recommend that the SDE develop a system for allocating funds on the basis of district need, as determined by ability to pay for supplemental services and the incidence of reading disability among pupils in the district.
- o We recommend that (1) the SDE review the level of training of current reading specialists to determine the number of specialists who have not completed the coursework required by

current law, and (2) the Legislature establish a timetable for requiring all specialists to take the required courses, if the results of the department's review warrant such action.

- o We recommend that the SDE conduct a survey to determine the incidence and severity of reading disabilities among primary school children in California.
- o We recommend that the SDE develop a plan to evaluate the Miller-Unruh program on the basis of its ability to prevent, correct, or overcome the effects of reading disabilities and submit the plan to the Legislature for budget consideration.

## CHAPTER I

### BACKGROUND AND COMMENTS ON RECOMMENDATIONS OF THE DEPARTMENT OF EDUCATION

#### Background

The Miller-Unruh Basic Reading Act was enacted in 1965. The program became operative in the 1966-67 fiscal year. The program was most recently reauthorized by Chapter 749, Statutes of 1981 (Senate Bill 906).

As specified in statute, the goal of the program is to prevent and correct "reading disabilities at the earliest possible time in the educational career of the pupil." To this end, the program establishes an incentive for school districts to employ reading specialists by providing a direct state subsidy of the salaries of Miller-Unruh reading specialists.

The maximum allowable subsidy amount for each specialist in any fiscal year is equal to the statewide average salary (exclusive of benefits) of elementary school teachers in the prior year, plus \$250. Current law, however, neither requires nor states the intent of the Legislature that funding appropriations equal the maximum allowable subsidy.

In 1985-86, the state provided a subsidy of \$21,117 per position for 913.5 positions, at a total cost of \$19,290,000. This level of state subsidy was equal to about 78 percent of the average elementary school teacher salary. We note, however, that the salary of the average reading specialist is higher than the average salary of elementary school teachers, and this latter salary is the basis for computing the maximum

state subsidy. The state subsidy currently covers about 65 percent of the total average salary of reading specialists. (See Table 1 for a 10-year funding history.)

Current law provides that Miller-Unruh reading specialists shall be relieved of all regular teaching and administrative responsibilities and that they shall devote their full time to providing (1) diagnosis and supplemental reading instruction for students and (2) staff development for other teachers in the school. Reading specialists are required to give first priority to serving pupils in kindergarten and grade 1 (with emphasis on the prevention of reading disabilities), second priority to providing diagnostic services and prescriptive instruction to pupils in primary grades, and final priority to providing corrective reading instruction to pupils in grades 4 through 6, after all primary needs are met.

The Miller-Unruh program operated in 149 districts and served 82,215 students in 1985-86, according to the Department of Education (SDE) estimates. Table 2 shows the distribution of state-subsidized Miller-Unruh specialists among the 20 largest school districts in California. As shown in Table 2, eight of the 20 largest districts participate in the program. Large districts that do not participate in the program include Los Angeles, San Francisco, Long Beach, Oakland, Sacramento, and San Jose.

#### **Findings and Recommendations by the Department of Education**

The sunset legislation specifies 11 items that the SDE's report may address and six items that it must address. Of the 11 optional items, the department addresses only one--the purpose and intent of the program. Of

Table 1  
 Funding for the Miller-Unruh Basic Reading Program  
 1976-77 to 1985-86

Year	Total Funding	: Districts	<u>Number of...</u> Specialists	Pupils	:	<u>State Cost per...</u> Pupil Specialist	
1976-77	\$13,849,625	203	1,234	135,660	\$102	\$11,223	
1977-78	14,680,625	188	1,150	102,350	143	12,765	
1978-79	14,005,317	169	986	91,890	152	14,204	
1979-80	14,005,317	165	1,009	97,000	144	13,880	
1980-81	15,265,796	165	992	89,280	171	15,389	
1981-82	16,181,744	164	964	86,760	187	16,786	
1982-83	16,182,000	163	905	83,980	193	17,881	
1983-84	17,152,920	150	901.6	87,287	197	19,025	
1984-85	18,166,000	150	918	86,115	211	19,789	
1985-86	19,290,000	149	913.5	82,215	235	21,117	

Table 2

Distribution of State-Funded Miller-Unruh Reading Specialists among the 20 Largest School Districts in California<sup>a</sup>

<u>District</u>	<u>Number of Specialists</u>	<u>ADA</u>
Los Angeles Unified	0 <sup>b</sup>	559,200
San Diego City Unified	47	111,359
San Francisco Unified	0	62,636
Long Beach Unified	0	61,479
Fresno City Unified	25	56,054
Oakland Unified	0	49,738
San Juan Unified	39	44,025
Sacramento City Unified	0	43,258
Garden Grove Unified	2	36,071
Santa Ana Unified	13	35,129
San Bernardino Unified	0	30,862
Mt. Diablo Unified	15	30,805
Montebello Unified	0	30,703
San Jose City Unified	0	29,971
Stockton City Unified	0	27,694
Richmond Unified	0	27,076
Compton Unified	0	26,828
Riverside Unified	0	25,206
Orange Unified	15	24,833
Fremont Unified	13	25,667

- 
- a. Based on 1985-86 first principal apportionment data.  
b. Zero indicates non-participating district.

the six required items, the department fails to discuss one--"findings regarding the program, including comments on whether any identified problems are implementation issues, or issues that require revision of law or regulations." Moreover, the department offers only a superficial discussion of the other five required items. As a result, our review indicates that the department's report provides little assistance to the Legislature in its deliberations regarding program continuation and improvement.

The SDE's Miller-Unruh Sunset Report makes only two recommendations. These concern the allocation of funds and the teaching of children's literature.

1. Allocation of Funds. The SDE recommends that any funds that become available to districts as a result of terminating Miller-Unruh positions be allocated to the remaining existing positions (rather than used to fund new positions in new districts). The department bases its recommendation on its finding that "there have been numerous complaints that a district's cost of supporting Miller-Unruh reading specialist positions is excessive." The department does not identify the source of these complaints.

Legislative Analyst's Comments: We do not concur with this recommendation. We recommend, instead, that current law be amended to require the SDE to allocate "excess" funds to new positions (as currently required by 1986 Budget Act language). We find the department's recommendation to be without merit, because it would result in an allocation procedure that would gradually and systematically reduce the cost-benefit ratio of the Miller-Unruh program. Under the department's proposal, an increased level of funding each year would be allocated to

fewer specialists who, in turn, would serve a smaller total number of pupils. We see no justification for providing larger amounts of money for fewer children.

This, in fact, has actually occurred over the past several years. During that time, the number of Miller-Unruh reading specialist positions has declined, because some districts have discontinued their participation in the program. Although the SDE indicates that 40 new districts have formally requested Miller-Unruh funding, it has decided not to replace cancelled positions with new positions in any of these interested districts. Instead, the department has followed the policy (which it now recommends) of using the funds made available through attrition to increase the level of funding per position for the remaining positions.

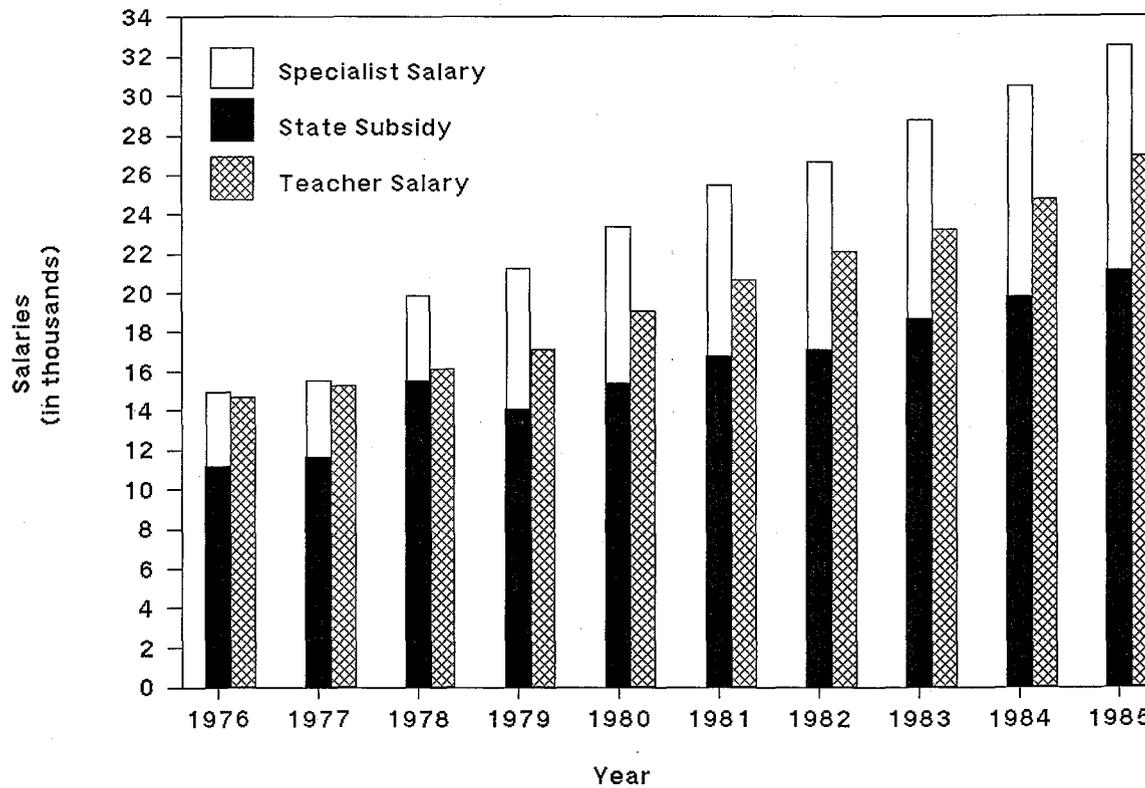
The effect of this trend is shown by Charts 1 and 2. Chart 1 shows the increase in the average salary of Miller-Unruh reading specialists and the state subsidy of those salaries between 1976 and 1985. For comparison purposes, Chart 1 also shows the increase of average elementary school teacher salaries (which provide the basis for computing the maximum state subsidy) over the same time period.

As Chart 1 shows, the average salary of reading specialists increased from \$14,927 in 1976 to \$32,083 in 1985 (an increase of 115 percent), and the state subsidy per specialist position increased from \$11,223 to \$21,117 (an increase of 88 percent). Meanwhile, the average salary of elementary school teachers increased from \$14,677 to \$26,923 (an increase of 83 percent). During this same time period, total funding for the Miller-Unruh program increased 39 percent (please see Table 1).

In 1976 and 1977, reading specialist salaries were only slightly

**Chart 1**  
**Average Miller-Unruh Specialist Salary**  
**and State Subsidy per Specialist**  
**Compared to Average Elementary School Teacher Salary**

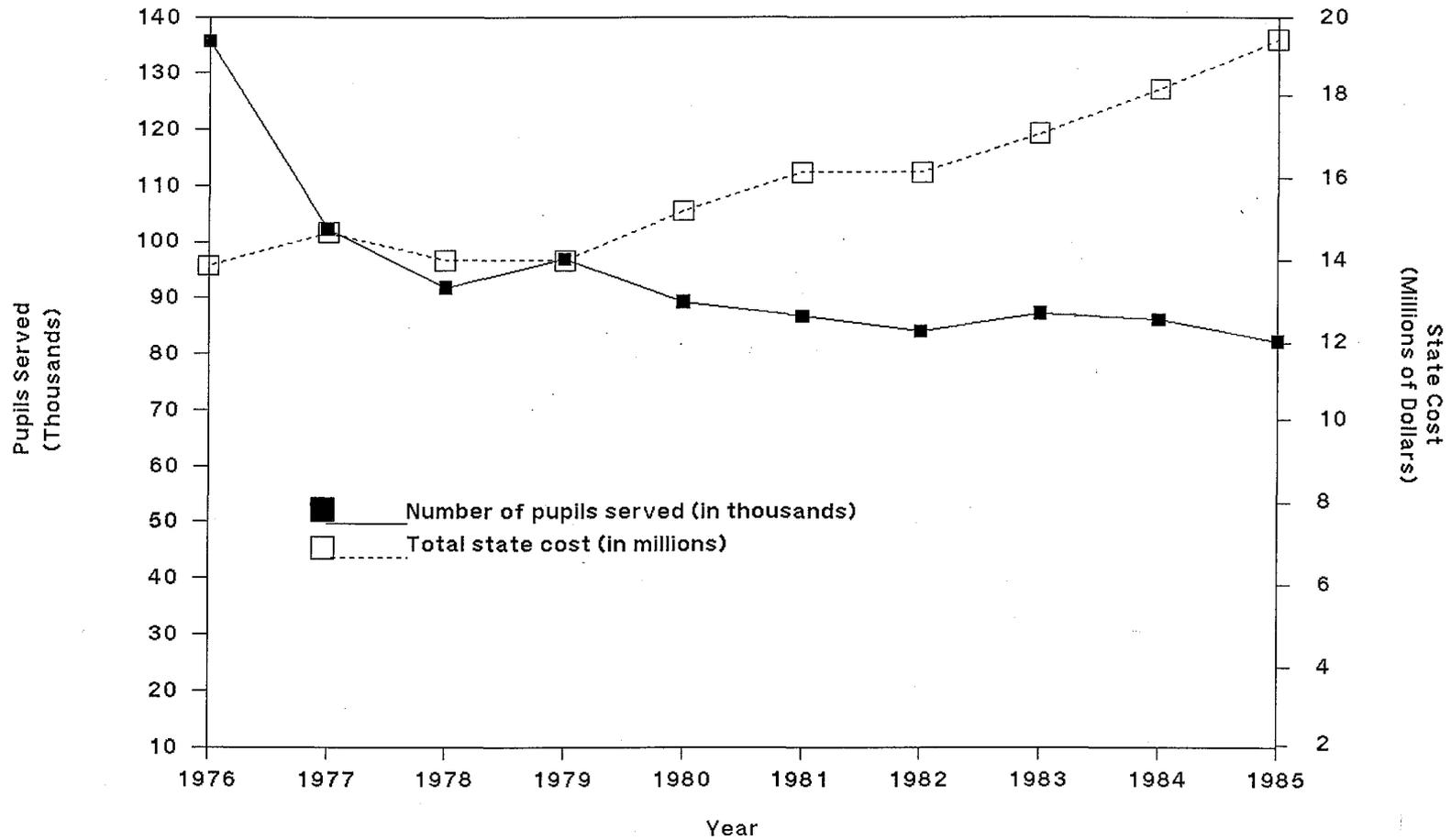
1976 through 1985



Note: Maximum specialist salary is equal to the prior-year average elementary school teacher salary plus \$250.

**Chart 2**  
**Number of Miller-Unruh Pupils Served**  
**and Program State Cost**

1976 through 1985



higher than the salaries of regular elementary school teachers. In 1978, however, reading specialist salaries jumped 28 percent, while teacher salaries increased 5 percent. This increase in Miller-Unruh specialists' salaries relative to both total program funding and the salaries of regular classroom teachers is apparently the source of districts' complaints that program costs have become "excessive," since districts must bear the cost of the non-subsidized portion of specialists' salaries. These salary increases, however, reflect local district compensation decisions, and do not--by themselves--constitute an argument for increased state funding.

The dramatic increase in reading specialist salaries followed the decline in the number of state-subsidized specialist positions (from 1,150 to 986) between 1977 and 1978. This decline occurred as participating districts dropped out of the program. The SDE, rather than making these positions available to other interested districts, simply increased the state subsidy for the remaining specialist positions. The remaining districts in the program, in turn, converted the increased subsidies into increased salaries for the reading specialists.

While the Miller-Unruh specialists have benefited from this policy, the benefits of the program have been reduced because, by reducing the number of specialists that are subsidized with state funds, the SDE also reduced the number of pupils that are served by the program. This effect is shown by Chart 2, which covers the same time period as Chart 1, and shows the decline in the number of pupils served from 135,660 to 82,215 (a decline of 39 percent). In other words, the department's practice of using excess funds to increase the subsidy for remaining positions rather than to add new positions has resulted in a 39 percent reduction in the

number of pupils served despite a 39 percent increase in total program funding.

The picture is only slightly altered after adjusting for inflation. This is shown in Table 3, which indexes funding and service level data, as adjusted for inflation, in order to track percentage changes in constant terms.

Table 3 shows that the inflation-adjusted teacher salaries and the state Miller-Unruh subsidy per position were about the same in 1985-86 as in 1976-77. Total funding, on the other hand, has not kept pace with inflation, and has dropped 25 percent during this time period. The number of pupils served, however, has dropped even more precipitously--39 percent--while the cost per pupil served has increased 24 percent, after adjusting for inflation. Again, this reflects the practice of allocating "excess" funds to existing positions instead of establishing new positions. It also reflects the fact that the number of pupils served per specialist has dropped from 110 to 90 during that period. This drop in workload per specialist contrasts with a 16 percent increase (in constant dollars) in the average salary of Miller-Unruh specialists.

We raised this issue in our Analysis of the 1985-86 Budget Bill, where we argued that the state's interest would be better served by maintaining the current number of reading specialists, rather than allocating the same level of funding (as increased by a cost-of-living adjustment) among fewer positions. Accordingly, we recommended that the Legislature adopt supplemental report language to the Budget Bill that would require the SDE to reallocate funds made available through attrition new positions rather than to existing positions. Although the Legislature

Table 3

Indexes of Inflation-Adjusted Funding and Service Levels  
Miller-Unruh Basic Reading Program<sup>a</sup>  
1976-1985

<u>Year</u>	<u>Total State Funding</u>	<u>State Cost Per Pupil</u>	<u>State Cost Per Specialist</u>	<u>Average Specialist Salary</u>	<u>Average Elementary Teacher Salary</u>	<u>Number of Pupils Served</u>	<u>Number of Specialists</u>
1976-77	100	100	100	100	100	100	100
1977-78	99	131	97	97	97	75	93
1978-79	87	129	119	115	95	68	80
1979-80	79	111	97	111	91	72	82
1980-81	78	119	97	111	92	66	80
1981-82	76	120	98	111	92	64	78
1982-83	73	118	95	111	93	62	73
1983-84	74	115	99	115	94	64	73
1984-85	74	117	100	115	95	63	74
1985-86	75	124	101	116	99	61	74

a. All fiscal data are adjusted for inflation using the GNP deflator for state and local government purchases. All data are expressed in terms of an index (1976-77 = 100) in order to show percentage changes.

adopted the recommended language, the SDE continued its prior practice in 1985-86 of reallocating excess funds to current positions. The Legislature subsequently adopted language in the 1986 Budget Act that again requires the SDE to allocate excess funds to new positions in 1986-87 and further required the SDE to recapture funds it had overpaid to districts in 1985-86 and allocate those funds to the new positions.

We continue to believe that the current number of reading specialist positions should be maintained with the current level of funding (as adjusted for inflation), and the Legislature has supported this position on two separate occasions. Accordingly, we recommend that the Legislature enact a measure that would require the SDE to allocate "excess" funds to new positions in order to maintain the current number of reading specialists with the current level of funding. (See Chapter III of this report for more recommendations regarding the allocation of Miller-Unruh funds.)

2. Teaching of Children's Literature. The department also recommends that candidates for a Miller-Unruh reading specialist position be required to complete a course in the teaching of children's literature. The department's report states that "it is important that pupils in all grades are provided a literature-based reading program." While this may be true, the report does not indicate why this should become a function of the Miller-Unruh program, which focuses on the prevention and correction of reading disabilities.

Legislative Analyst's Comments: Because the department does not offer any justification for its recommendation, we have no basis for evaluating its merits. Currently, a teacher must meet the following

requirements in order to qualify for a Miller-Unruh reading specialist position:

- o Hold a Reading Specialist Credential or a Miller Unruh Reading Specialist Certificate;
- o Have completed three years as a successful teacher in any of grades 1 to 6, inclusive;
- o Be fully credentialed by the State of California to teach in kindergarten or any of grades 1 to 6, inclusive; and
- o Have completed a basic college or university course in (1) the teaching of elementary school reading, (2) the teaching of elementary school language, (3) the diagnosis and remediation of reading disabilities, and (4) directed clinical practice in the remediation of reading disabilities.

We believe that these requirements are directly related to the primary goal of the Miller-Unruh program, which is to provide supplemental instruction in primary grades to prevent and correct reading difficulties. It is not clear to us how taking a course in the teaching of children's literature would serve this specific objective, and the SDE report does not present a rationale in support of its recommendation. In fact, the department's report does not provide any discussion of the advantages and disadvantages of using Miller-Unruh specialists to teach children's literature, and it mentions the issue only in its recommendation that this requirement be added to the training of specialists. Accordingly, we have no basis for making a recommendation on this issue. Please see Chapter III of this report, however, for our recommendation regarding the preparation of reading specialists.

CHAPTER II  
LEGISLATIVE ANALYST'S FINDINGS

This chapter contains our independent findings concerning the Miller-Unruh Program's implementation and effectiveness.

**Findings Regarding Program Implementation**

Level of Participation. As mentioned, in 1985-86, the Miller-Unruh Reading Program operated in 149 school districts and served an estimated 82,215 pupils, according to State Department of Education (SDE) data. In that year, the state provided an average subsidy of \$21,117 for each of 913.5 reading specialists, for a total cost of \$19.3 million.

Participating districts are distributed among 36 of California's 58 counties.

Allocation of Funds. Existing law requires the SDE, in allocating allowances for the Miller-Unruh program, to adopt a system that gives priority to districts in the following order:

- o First, to ensure that the districts participating in the program during the preceding school year, and which continue to be eligible, will not be required to reduce programs below the funding level of the preceding year (emphasis added); and
- o Second, to ensure that applications for new programs in eligible schools be considered on a priority basis in terms of the percentage of pupils having reading difficulties and the financial ability of the district to provide special instructional assistance.

In implementing these provisions, the primary concern of the

Department of Education has been to ensure that funding for participating districts not fall below prior-year levels. This allocation methodology ties district support eligibility exclusively to current participation in the program, and ignores the second statutory priority of district need and ability to pay for special reading instruction. We believe that by restricting funding only to districts that continue to be eligible, the statute implies an obligation for the SDE annually to evaluate district eligibility on the basis of need and relative wealth, and to ensure that only districts that continue to be eligible shall continue to receive an allowance.

Because the SDE has not implemented the law in this manner, we have found that 49 of the 120 Miller-Unruh districts in 1985-86 had above-average revenue limits, compared with districts of similar size and type. We are unable to make a similar comparison with respect to relative need because the department has not developed a standard of need. Such a standard, we believe, should be based on the incidence of reading disabilities in districts, since the purpose of the program is to prevent and correct this disability. In the absence of a standard, we have no way of determining whether districts receiving Miller-Unruh funds are, in fact, the neediest with respect to reading disability.

Our field visits to participating school districts, however, revealed a substantial disparity in the caseload of specialists. In one district, for example, the specialist serves only about 35 pupils during the year, while in another, specialists serve approximately 120 pupils annually. In order to fill out the workload of specialists in low-need districts, the low-need district adopts more lenient identification

criteria for providing services. For example, all pupils reading below the 50th percentile in the low-need district receive Miller-Unruh services, while, in the high-need district, only pupils reading below the 25th percentile are eligible.

Moreover, specialists in high-need districts are sometimes constrained by the statutory limit on their caseloads (current law limits each specialist's daily caseload to 40 pupils and the total caseload to 60 pupils at any one time). Accordingly, we have observed that, while affected specialists do not exceed the maximum legal caseload, some specialists find it necessary to rotate pupils on and off their official caseloads, in order to provide services to as many pupils as possible without exceeding the limit.

As a result of these differences in workload, there are differences among districts in the level of services received by pupils. Under the current funding mechanism, however, neither the amount of funding per position nor the number of funded positions in a district is adjusted according to workload.

Role and Training of Specialists. The law provides that Miller-Unruh reading specialists shall be relieved of all regular teaching and administrative responsibilities in order to devote their full time to the following priorities:

- o First, to supplement the reading instruction in kindergarten and grade 1, with an emphasis on the prevention of reading disabilities;
- o Second, to provide supplementary, specialized diagnostic services and prescriptive instruction to primary grade pupils;

and

- o Third, to provide corrective instruction to pupils in grades 4 to 6 after all primary needs are met.

Each specialist is also responsible for providing leadership for the total school reading program.

In order to qualify as a Miller-Unruh reading specialist, a teacher must hold either a Reading Specialist Credential or a Miller-Unruh Reading Specialist Certificate. A Reading Specialist Credential requires a year of graduate training in a program approved by the Commission on Teacher Credentialing (CTC). To obtain a Miller-Unruh Reading Specialist Certificate, a candidate must pass a written exam that is administered by the CTC.

In addition, a candidate for a Miller-Unruh position must complete the courses indicated on page 20. These course requirements became effective September 30, 1983. Specialists with certificates issued prior to that date are not required to complete the courses. (Specialists with credentials typically take these courses as part of their normal course of study.) As a result, some Miller-Unruh specialists have no training in the diagnosis and remediation of reading disabilities, although that is the primary goal of the program.

We were not able to obtain from the SDE the number of currently employed certificated specialists who received their certificates prior to the effective date of--and therefore may not satisfy--the new requirements. We do know, however, that there are 913 Miller-Unruh positions, and that only 79 new certificates have been awarded since the new requirements became effective. The SDE has no data on how many of

these 79 certificated specialists are employed as Miller-Unruh specialists, nor does the SDE know how many Miller-Unruh specialists are credentialed rather than certificated.

Coordination with Other Programs. The SDE reports that many pupils who receive Miller-Unruh instruction also qualify for supplemental services offered through other programs, such as bilingual education, special education, and compensatory education. The department has not developed guidelines, however, that specify how Miller-Unruh should be coordinated with other programs to promote a complementary delivery of multiple services, while avoiding duplication of effort. School-level coordination may be achieved through the School-Based Program Coordination Act (AB 777--Chapter 100, Statutes of 1981), but only a few small districts take advantage of this opportunity.

#### **Findings Regarding Program Effectiveness**

The statutory purpose of the Miller-Unruh program is to prevent and correct reading disabilities. Unfortunately, there have been no studies that attempt to evaluate the effectiveness of the program on that basis. In fact, there have been no studies that attempt to evaluate the need for the program on that basis. Moreover, neither the SDE nor the Reading Specialists of California (the professional association of Miller-Unruh reading specialists) has a working definition of "reading disability." As a result, there is no information on the number of reading disabled children in California, the types or severity of reading disabilities, or the effectiveness of the Miller-Unruh program in diagnosing, treating, and preventing reading disabilities.

We last reported to the Legislature on the effectiveness of the

Miller-Unruh program in 1975 ("Miller-Unruh Basic Reading Program," Statement of the Legislative Analyst to the Senate Education Committee, December 3, 1975). Using data from the 1973-74 annual report, we compared the Miller-Unruh program with the Early Childhood Education (ECE) program (the predecessor of the School Improvement Program), federal Title I programs (the predecessor of Chapter 1), and the Educationally Disadvantaged Youth program (the predecessor of Economic Impact Aid).

Using multiple regression analysis, we evaluated the programs on the basis of actual reading achievement as compared to expected reading achievement. We found that some schools exceeded expected achievement levels, while others did not. The percentage of Miller-Unruh schools that exceeded expected reading achievement, however, was larger (by a small amount) than the percentage of non-Miller-Unruh schools that exceeded expectancy. On this basis, we concluded that the Miller-Unruh program appeared to be associated with slightly greater reading achievement than the other programs evaluated.

Our report cited two important limitations, however, that reduce the extent to which its findings can lead to general conclusions. First, the data were obtained from a small sample (only 21 districts), and second, there were no control groups for making valid comparisons. Accordingly, while finding that the Miller-Unruh program appeared to be associated with program success, we stated that "this conclusion cannot be established definitively on the basis of existing data."

The most recent study of the Miller-Unruh program was reported by the SDE in 1977. This study, however, used data from only Miller-Unruh schools, and did not attempt to compare reading achievement in

Miller-Unruh schools with reading achievement in non-Miller-Unruh schools. For this reason, the SDE report has no value in attempting to determine the added benefit (if any) of the Miller-Unruh program on reading achievement.

### **Summary of Findings**

Our review of the implementation of the Miller-Unruh reading program indicates the following problems:

- o Funds are not targeted to districts with the greatest need.
- o The amount of a district's allowance is not related to its workload.
- o The program is focused more on remedial reading than on the prevention/correction of reading disabilities.
- o Some specialists are undertrained with respect to the diagnosis and remediation of reading disabilities.

Our review of the evaluations of the Miller-Unruh program indicates the following:

- o Although there have been studies of the impact of the Miller-Unruh program on reading performance (as measured by standardized reading exams), there have been no studies that examine either the need for or effectiveness of the Miller-Unruh program with respect to the prevention and correction of reading disabilities.

CHAPTER III  
LEGISLATIVE ANALYST'S RECOMMENDATIONS

**Continue Program in Revised Form**

We recommend that the Miller-Unruh Program be continued, with the current level of funding, provided that certain modifications to improve the program are adopted.

On the basis of our review of the Miller-Unruh Reading Program, we have concluded that, as currently implemented, it has two fundamental flaws: (1) it does not address a well-defined need and (2) it does not direct funds to a well-defined target population. These problems result in other, secondary problems, such as the absence of measures of need and effectiveness and lack of a relationship between workload and funding level.

We emphasize, however, that the problems we have identified are related to the current implementation of the program, and they do not necessarily reflect an inherently flawed program design. We do not, therefore, recommend that the program be eliminated at this time. We do, however, believe that the implementation problems must be resolved in order to (1) bring the program into alignment with legislative objectives and (2) improve program effectiveness and efficiency. Accordingly, we recommend that the program be continued, with the current level of funding, provided that implementation problems are eliminated, as discussed below.

**Define "Reading Disability"**

We recommend that the Department of Education (SDE) develop a

definition of "reading disability."

Developing a definition of "reading disability" is a necessary first step toward implementing other needed changes. Specifically, such a definition is needed in order to (1) obtain measures of state-wide and district need for Miller-Unruh funding, (2) allocate funds to districts on the basis of workload, and (3) evaluate the program on the basis of its effectiveness in preventing and correcting reading disabilities.

We understand that it is unlikely that a universally-accepted definition of "reading disability" can be developed in the near future. It is both necessary and possible, however, to identify specific disabling or handicapping conditions that would provide the focus for a state-supported intervention program. For this purpose, the definition should discriminate between reading disability and low reading achievement, because, while reading disability may be manifested in low reading achievement, low reading achievement is not necessarily an indication of reading disability.

**Focus on the Prevention and Correction of Reading Disabilities**

We recommend that the SDE develop rules and regulations to ensure that the Miller-Unruh program focuses on the prevention and correction of reading disabilities.

The Miller-Unruh program should address its statutory objective, which is to prevent and correct reading disabilities at the earliest possible time in a pupil's educational career. To accomplish this, the department should (1) establish eligibility criteria to ensure that funds are allocated to the districts having the greatest need (as determined partly by the incidence or rate of reading disability in the primary

grades) and (2) establish rules and regulations to ensure that--within funded districts--services are provided to the target population.

The SDE's implementation of the program, however, confuses low reading achievement with reading disability. As indicated above, low reading achievement is not necessarily evidence of reading disability. Because other funds (such as state and federal compensatory education funds) can be used to improve reading achievement of poor readers, we see no need to redirect Miller-Unruh funding to this purpose. Accordingly, we recommend that the Miller-Unruh program focus specifically on the prevention and correction of reading disabilities.

We note in this context that the SDE, pursuant to recent legislation--AB 972 (Chapter 1376, Statutes of 1985)--is developing a screening test for early diagnosis of reading disabilities. The test, if successful, will identify kindergarten children who have, or are at risk of developing, a reading disability. Such a test could be used to establish eligibility for Miller-Unruh services.

#### **Allocate Funds According to Need**

We recommend that the Department of Education develop a system for allocating funds according to district need as determined by ability to pay for supplemental services as well as by the incidence of reading disabled pupils in the district.

We have previously recommended that Miller-Unruh funds be allocated to districts on the basis of workload. Current law also specifies that the financial ability of school districts shall be a criterion in determining their eligibility for Miller-Unruh funding. Accordingly, we recommend that the SDE establish a funding system to implement this

objective. The system developed by the department also should provide a method for phasing out funding for districts that lose eligibility under the department's criteria.

Because some districts may not have a sufficient workload to justify a full-time Miller-Unruh specialist, we also recommend that the department's funding system contain provisions for (1) encouraging districts to form consortia for the purposes of sharing specialists and (2) allowing county offices of education to employ specialists for the purpose of sharing the services of the specialists among eligible districts within the county.

#### **Determine the Level of Training of Current Specialists**

We recommend that (1) the SDE review the level of training of current reading specialists to determine the number of specialists who have not completed the coursework required by current law, and (2) the Legislature establish a timetable for requiring all Miller-Unruh specialists to complete required coursework, if warranted by the results of the department's review.

As noted earlier, some specialists have no training in the diagnosis and treatment of reading disabilities. Although we were unable to determine the number of specialists who lack this training, the small number of Miller-Unruh Certificates granted since the coursework became required gives us reason to believe that the number may be significant. Meanwhile, we find no analytical justification for the state to subsidize the salaries of specialists who are not trained to fulfill the objective of the program. Accordingly, we recommend that the SDE conduct a survey to determine the level of training among current specialists. If (1) the

department identifies a large number of specialists who are not trained in the diagnosis and treatment of reading disabilities, and (2) it is determined that the majority of undertrained specialists are likely to continue to hold positions for more than two or three years, we would further recommend that the Legislature establish a timetable for requiring all Miller-Unruh reading specialists to obtain such training.

#### **Conduct a Needs Assessment**

We recommend that the SDE conduct a survey to determine the incidence and severity of reading disabilities (according to a uniform, statewide definition) in California.

This information is necessary to (1) obtain a measure of the need for the Miller-Unruh program and (2) establish a baseline for assessing the effectiveness of the program in reducing the incidence, or overcoming the effects, of reading disabilities. Having information on the need for and the effectiveness of the program, in turn, will promote the most effective use of scarce resources.

#### **Evaluate the Program on the Basis of its Statutory Goals**

We recommend that the SDE develop a plan to evaluate the Miller-Unruh program on the basis of its ability to prevent, correct, or overcome the effects of reading disabilities and submit the plan to the Legislature for the 1988-89 budget considerations.

Past evaluations of the Miller-Unruh program have attempted to use the average reading scores of all pupils within Miller-Unruh schools as a measure of program success. In fact, average scores that are based on the performance of all students are irrelevant when the concern is with the performance of a subset of students--in this case, students with reading

disabilities. Accordingly, an evaluation of the Miller-Unruh program should focus only on the reading performance of those students who have been identified, using standard criteria, as having a (potential) reading disability. Specifically, the evaluation should focus on the effectiveness of the Miller-Unruh program in preventing, correcting, or overcoming the effects of reading disabilities among affected pupils.

We believe that such an evaluation should be done by a direct assessment of pupils who are identified as having a reading disability, and by comparing the ability of pupils that have received Miller-Unruh services with the ability of similar pupils that have not. This evaluation plan should be submitted for funding consideration during the 1988-89 budget deliberations.

#### **Summary of Recommendations**

We recommend that the Miller-Unruh Reading Program be continued, with the current level of funding, provided the following modifications are adopted:

- o The SDE should direct the program toward the prevention and correction of reading disabilities,
- o The SDE should allocate program funds according to need (as determined by the incidence of reading disabled pupils among districts and the districts' ability to pay for supplemental reading instruction),
- o The SDE should review the level of training of current Miller-Unruh specialists and--if needed--the Legislature should require that training of current specialists be upgraded,
- o The SDE should conduct a needs assessment for the program, and

- o The SDE should evaluate the program on the basis of its statutory objectives.