



Advocates for Children of New York

Protecting every child's right to learn

September 18, 2026

William P. Murphy
Deputy Commissioner, Office of Higher Education
New York State Education Department
89 Washington Avenue
Albany, NY 12234

Via email: OHERegcomments@nysed.gov

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Re: Registration and certification requirements for teacher preparation programs that focus on literacy instruction

Dear Deputy Commissioner Murphy:

Advocates for Children of New York (AFC) appreciates the opportunity to submit comments in support of the New York State Education Department (NYSED) proposal to amend Sections 52.21 and 80-3.7 of the Regulations of the Commissioner of Education relating to registration and certification requirements for certain teacher preparation programs that focus on literacy instruction.

For more than 50 years, AFC has worked to ensure a high-quality education for New York students who face barriers to academic success, focusing on students from low-income backgrounds. Every year, AFC helps thousands of families navigate the New York City school system, including many families whose children have language-based learning disabilities like dyslexia or are otherwise struggling with reading.

We strongly support the proposed amendments to the regulations, which will help strengthen the State's educator preparation programs and thereby ensure more students receive the instruction and support they need to become proficient and lifelong readers.

Teaching children how to read is one of the most fundamental responsibilities of our public schools — and thus teaching teachers how to teach reading is one of the most fundamental responsibilities of educator preparation programs (EPPs). High-quality English Language Arts (ELA) curricula and reading intervention programs, while essential, cannot replace teacher expertise, as any program is only as good as its implementation. Teachers need deep knowledge of the science of reading, the



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structure of language, and evidence-based practice to be able to use such published curricula effectively and differentiate instruction to meet the needs of the individual students in their own classrooms. Yet for far too long, the State's higher education programs have produced teacher candidates who — through no fault of their own — are ill-equipped for the task at hand. In the absence of strong regulations and specific, detailed guidance on what every teacher should know and be able to do, many EPPs have provided pre-service educators with grossly inadequate training. At AFC, we see the collateral consequences: young people who are fully capable of learning to read but have been struggling unnecessarily for years, unable to get the help they need within the public schools, because their teachers have been left to figure it out on their own.

As you move forward with these regulatory changes, we urge NYSED to provide robust support, guidance, and technical assistance to EPPs as they work to align their coursework and clinical experiences with the NYS EPP Science of Reading Framework. Oversight will be essential to ensure all programs make the changes necessary to fully comply with the new requirements. Some EPPs will need to significantly overhaul their existing syllabi, classes, and clinical programming to root out disproven practices and shift faculty attitudes and beliefs about dyslexia and reading science; absent State oversight and assistance, some universities may do little to ensure more than surface-level compliance.

Improving literacy instruction in P–12 will only be possible if we invest in our educators and ensure they enter the classroom with the knowledge, skills, and practical experience they need to effectively teach foundational literacy skills to students with a wide range of needs. As the aptly titled paper *Teaching Reading IS Rocket Science* noted more than 25 years ago, “Just about all children can be taught to read and deserve no less from their teachers. Teachers, in turn, deserve no less than the knowledge, skills, and supported practice that will enable their teaching to succeed.” The proposed regulatory changes are a critical and long-overdue step towards making this vision a reality in New York State. We support these proposed changes and thank the Board of Regents and NYSED for your attention to this critical issue.

Respectfully,

Sarah Part
Senior Policy Analyst