Journal of Teaching and Learning

JIL

Response to Cummins: The OHRC Right to Read Report will Move Ontario into the 21st Century

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Volume 16, numéro 3, 2022

URI: https://id.erudit.org/iderudit/1096540ar DOI: https://doi.org/10.22329/jtl.v16i3.7495

Aller au sommaire du numéro

Éditeur(s)

University of Windsor

ISSN

1492-1154 (imprimé) 1911-8279 (numérique)

Découvrir la revue

Citer ce document

Klein, P. (2022). Response to Cummins: The OHRC Right to Read Report will Move Ontario into the 21st Century. *Journal of Teaching and Learning*, 16(3), 96–108. https://doi.org/10.22329/jtl.v16i3.7495

Résumé de l'article

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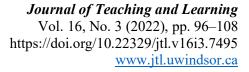
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Dialogue & Commentary

Response to Cummins: The OHRC *Right to Read* Report Will Move Ontario into the 21st Century

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Abstract

In the April 2022 issue of the *Journal of Teaching and Learning*, Dr. Jim Cummins responded to the Ontario Human Rights Commission (2022a, 2022b) report on the *Right to Read: Public Inquiry into Human Rights Issues Affecting Students with Reading Disabilities*. He expressed several views on literacy education that are moderate and consistent with research. However, his very critical appraisal of the report is misdirected. The first section of the present article documents several recommendations and positions that Cummins attributes to the report but that it does not actually contain. The second section identifies five ways in which this report will bring Ontario's special education policy into the 21st century, which Cummins has missed. The *Right to Read* report provides a paradigm for special education that Ontario should now apply to additional domains such as mathematics and social and emotional learning.

Introduction

The Ontario Human Rights Commission (OHRC) investigated reading education for students with dyslexia. The resulting *Right to Read Report: Public Inquiry into Human Rights Issues Affecting Students with Reading Disabilities* (2022a; hereafter *R2R Report*) and its *Executive Summary* (2022b) chart a path toward literacy education for students with dyslexia and other struggling readers. In the April 2022 issue of the *Journal of Teaching and Learning*, Dr. Jim Cummins presented a largely critical response to the report. I will argue that Cummins misinterpreted the report by attributing to it several recommendations and claims that it does not contain. I argue for a strongly favorable appraisal. Ontario's special education policy has long been stranded in the 1980s. The *R2R Report* moves Ontario into the 21st century by introducing a strong emphasis on research, a developmentally informed conception of learning disabilities, a focused approach to intervention, a valid and timely approach to assessment, and a contemporary framework for organizing inclusive literacy education.



Misinterpretations of the R2R Report

No claim of a general crisis

Cummins (2022) attributes to the *R2R Report* the claim that Ontario is in a "crisis," in which "Ontario schools are failing to teach reading skills effectively for all students" (p. 86); he claims that the report is "manufacturing an artificial and evidence-free crisis that is easily refuted" (p. 88) and "misrepresenting the remarkably positive overall literacy accomplishments of Ontario students" (p. 90). To rebut this supposed crisis narrative, Cummins presents evidence from the Programme for International Student Assessment (PISA) showing that Ontario students rank higher in reading than students in most other countries (2022, pp. 86–88).

Cummins is correct that most Ontario students are learning to read. Fortunately, the *R2R Report* does not claim that Ontario has a general reading crisis or that Ontario ranks poorly in international tests. Rather, the authors explicitly acknowledge "Ontario and Canada's generally strong performance in PISA" (OHRC, 2022a, p. 75). However, they also document the fact that a substantial minority of students in Ontario are not learning to read well, particularly those with individual education plans, including those with dyslexia. For example, "13% of students (or about one in seven) performed at the lowest levels of PISA (below level 2)" (OHRC, 2022a, p. 76). With respect to EQAO assessments, only 8.5% of Grade 3 students with special education needs met the provincial standard in reading without assistive technology or scribing (OHRC, 2022a, p. 68). Additionally, on the 2015 PISA, Canada had the lowest student coverage rate of any Organisation for Economic Co-operation and Development (OECD) country at 52.5%, far below the average coverage rate of 78.1%, thus underrepresenting lower achieving readers (Anders et al., 2021). In attributing a manufactured crisis to the *R2R Report*, Cummins misreads it and fails to take into account that reading achievement comprises a distribution; it is consistent and accurate to claim that many Ontario students are learning to read well while many others are struggling.

Similarly, in his interpretation of the report's discussion of reading instruction, Cummins (2022) says the authors "stray from the specific challenges faced by students with dyslexia, and other forms of reading difficulties" (p. 86). He is correct that the R2R report calls for revisions to the Ontario curriculum, which would inform instruction for all students. However, here, too, the R2R Report does not assume a general crisis. Rather, there are at least two reasons for such a curricular revision. First, the proposed revisions would more clearly and accurately represent the development of early reading skills. Research on literacy development has documented the contributions of multiple cognitive and linguistic abilities, including phonemic awareness, letter knowledge, phonetic knowledge, orthography, morphology, listening comprehension, vocabulary knowledge, discourse knowledge, theory of mind (perspective taking), and self-regulatory knowledge (Carlson et al., 2013; Clayton et al., 2020; Garcia & Cain, 2020; Kim, 2020a, 2020b; Kim & Graham, 2022; Kim et al., 2021). This literature analyzes the direct and indirect effects of these various abilities on reading and writing development and the shifts in the relationships among them as students progress through the grades. These relationships comprise a trajectory of literacy learning, which can be used to understand both typical and atypical development (Petscher et al., 2018; Yu et al., 2018).

Unfortunately, the current language curriculum (Ministry of Education for the Province of Ontario [MEPO], 2006) is extremely patchy in its representation of literacy development, particularly early reading development. For example, the key Grade 1 skills of "blending and segmenting of individual sounds in words" are briefly mentioned, but only as one example of how students might read unfamiliar words (MEPO, 2006, p. 41), implying that they are optional. It

presents the reading of unfamiliar words as driven by semantic cues, syntactic cues, and "Graphophonic cues" (MEPO, 2006, p. 40); however, there is no evidence that the first two contribute significantly to reading development. The *R2R Report* recommendations point the way toward a research-based and fine-grained conception of reading development, which would then form the basis for assessment and intervention.

The *R2R Report* makes recommendations for evidence-based instruction for all students. However, again, this does not assume a general crisis in reading education. Rather, this recommendation is based on a framework of Response to Intervention (RTI), or more broadly, Multi-Tiered Systems of Support (MTSS). In RTI, Tier 1 is comprised of whole-class instruction using evidence-based methods, designed to be effective both for typically developing students and for those with exceptionalities. The reason that phonemic awareness and phonics are appropriate for Tier 1 initial reading instruction is that previous research has demonstrated their effectiveness with a diversity of beginning readers, including average-achieving students learning to read in L1, students with dyslexia, students who are low-achieving, and students who are learning to read in L2 (Ehri, Nunes, Stahl, & Willows, 2001; Ehri et al., 2001; Murphy Odo, 2021; Suggate, 2016).

Phonics not offered as a panacea

In a further criticism of the *R2R Report*, Cummins (2022) objects to "The Myth of Phonics as Panacea" (p. 88). However, the report does not claim that phonics is a panacea; instead, the *Executive Summary* explicitly and repeatedly makes statements such as this one:

Early word-reading skills are critical, but they are not the only necessary components in reading outcomes. Robust evidence-based phonics programs should be one part of broader, evidence-based, rich classroom language arts instruction, including but not limited to story telling, book reading, drama, and text analysis. (OHRC, 2022b, p. 5, see also pp. 4, 20, 25)

The same point is made many times in the full report (OHRC, 2022a, pp. 12–13, 162, 204, etc.), which further states the importance of informational literacy, written expression, and reading comprehension strategies.

So why does Cummins rebut a claim that the report does not make? I will dub "Phonics is not a panacea" the PINAP critique. It has become an obligatory critique for critics of systematic phonics instruction. A Google search in June 2022 retrieved 4,340 occurrences of "phonics is not a panacea." However, I am not aware of any researcher or educator who has written or stated that phonics is a panacea or that it is sufficient for literacy education. Consequently, I infer that the function of the PINAP critique is to set up an imaginary position that the critic can then easily knock down.

The relationship of phonics to reading comprehension

Cummins further wishes to warn readers that phonics instruction does not have significant impacts on reading comprehension after Grade 1, and he believes "These findings have been almost totally ignored by policymakers in the United States (and by the OHRC)" (2022, p. 88). However, far from ignoring the shifting relationship across grades between phonics and comprehension, the *R2R Report* is actually based upon it, aligning with the research literature to clarify this relationship in three ways. First, as Cummins pointed out, phonics instruction has a significant effect on reading comprehension in Grade 1 (e.g., Ehri, Nunes, Stahl, & Willows,

2001). Consistent with this, the *R2R Report* recommends instruction in letter–sound relationships beginning in kindergarten and continuing as a focus of decoding instruction into Grade 1 (OHRC 2022b, pp. 20–21); however, it does not recommend continuing to focus on letter–sound relations with typically developing students beyond that level.

Second, previous research has documented the progression in which students build on their initial phonics skills using more advanced decoding strategies involving orthography and morphology (e.g., Cunningham & Carroll, 2015; Law & Ghesquière, 2017); instruction in these skills, combined with phonology instruction, *does* significantly impact reading comprehension for students in Grades 2 and 3 (Lovett et al., 2017). Consistent with this, the *R2R Report* recommends a shift in decoding instruction: "From about Grade 2, explicit instruction focuses more on advanced knowledge and skills, such as increased study of word structures and patterns (for example prefixes, word roots and suffixes), and how word spellings relate to one another" (OHRC 2022b, p. 21; OHRC 2022a, pp. 195–196).

Third, previous research has shown that abilities such as reading fluency, discourse knowledge, and executive functioning play important roles in the development of reading comprehension (Follmer, 2018; Garcia & Cain, 2014; Kim 2020a) and that instruction in these abilities improves comprehension (Bogaerds-Hazenberg et al., 2021; Hebert et al., 2016; Okkinga et al., 2018; Scammacca et al., 2015; Stevens et al., 2017). Consistent with this, the *R2R Report* recommends instruction and practice in fluency, vocabulary learning, and reading comprehension strategies (OHRC, 2022a, pp. 162, 204). In short, far from ignoring developmental changes in the relationship between phonics instruction and reading comprehension, the *R2R Report* fully integrates these into its recommendations.

One size fits all

Cummins (2022) further criticizes "one-size-fits-all" approaches to literacy (p. 89). I will call this the One Size Doesn't Fit All (OSDFA) critique. It is obviously correct that students of different ages and skill levels vary widely in what they know about reading and what they need to learn. However, here, too, Cummins's critique is based on a misinterpretation of the R2R Report, which takes an approach that is maximally different from that of one-size-fits-all. As noted above, the report endorses RTI or, more generally, multi-tiered systems of support (2022a, pp. 274–276). In this framework, all students participate in early assessment. If they are not progressing well in Tier 1 instruction, they access Tier 2, usually comprised of small-group instruction adapted and paced to the learner. If students are not progressing well in Tier 2, they access Tier 3, typically comprised of individual intervention. Throughout this process, students' progress is monitored through frequent brief assessments, and grouping is flexible, so that students can change tiers according to their current learning needs. Consequently, the R2R Report increases rather than reduces the number of "sizes" available to students and the opportunities for students to find their "fit." A Google Scholar search of "phonics" and "one size fits all" retrieves 5,240 webpages, most of which appear to offer the OSDFA critique of phonics education. Here, as with the PINAP critique, Cummins appears to be repeating a critique frequently invoked to dismiss systematic phonics instruction; however, it is not applicable to this report.

Clarifying "balanced literacy"

A murkier issue concerns balanced literacy. Cummins advocates for a balanced approach to reading education (2022, pp. 88–89). In contrast, the *R2R Report* comments negatively on

balanced literacy 20 times in the *Executive Summary* alone (2022b, e.g., pp. 21, 25, 26). Why such diametrically opposed stances? It appears that Cummins and the *R2R Report* authors are using the term "balanced" in different ways, so that they appear to disagree, although they actually hold views that overlap with one another. Cummins (2022) uses the phrase "balanced reading" to refer to an approach "that integrates the teaching of sound/symbol relationships with a more general commitment to immerse children into a literacy-rich instructional environment" (p. 85) and elements such as extensive reading of self-selected material, reading across the curriculum, and written expression. In contrast, the *R2R Report*, like some other sources (e.g., Fletcher et al., 2021; Moats, 2017), appears to use the term "balanced literacy" to refer primarily to the work of particular authors and their programs (e.g., Fountas & Pinnell, 1999, 2012–13), who the OHRC authors take to advocate minimal teaching of phonics. That is, it appears not to be balance in literacy education that the *R2R Report* objects to, but a de-emphasis on phonics instruction. In comparing the views of Cummins and the *R2R Report* authors, I take both to favour some version of a comprehensive approach to literacy education that includes instruction in phonics, spelling, reading comprehension, and written expression.

Phonics explicit and systematic

There is one issue on which Cummins and the *R2R Report* substantively disagree: whether phonics instruction should be explicit and systematic. Cummins's main rebuttal is that there is no consensus on this issue. However, my reading of the empirically based literature is that there is a near consensus not only across authors but across disciplines and research methods, supporting initial decoding instruction that is explicit, systematic, and focused primarily on grapheme-phoneme correspondences.

This includes the following kinds of evidence: linguistic analysis of the mapping of print to sound for representational units of various sizes, for example, letters and words (Kearns, 2020; Vousden et al., 2011); longitudinal and cross-sectional studies of both typically developing students and those with exceptionalities (Double et al., 2019; Hjetland et al., 2019; Knight et al., 2019; Mervis et al., 2022); instructional studies comparing the effects of teaching representational units of various sizes (Bruck & Treiman, 1992; Christensen & Bowey 2005; Levy & Lysynchuk, 1997 Yeh & Connell, 2008); fine-grained, step-by-step analysis of the effect of teaching on learning (Byrne & Fielding-Barnsley, 1989); cross-sectional and longitudinal research examining connections between students' knowledge of grapheme—phoneme relationships and their ability to decode larger units of language (Ehri & Robbins, 1992; Law & Ghesquière, 2017; Rastle, 2019); experimental and quasi-experimental studies of the effects of particular programs (e.g., Bradley & Bryant, 1983; Savage et al., 2020); and meta-analyses integrating the results of multiple experiments and quasi-experiments (Ehri, Nunes, Stahl, & Willows, 2001; Murphy Odo, 2021). Nothing like this concord of multidisciplinary evidence supports initial reading instruction that is implicit, unsystematic, or focused on units other than grapheme—phoneme correspondences.

It is true that there are questions on which there is not yet consensus among empirical researchers. Examples include the following: when should morphology be added to decoding instruction, and what morphemes should be the focus (Devonshire et al., 2013; Rastle, 2019)? Is synthetic phonics instruction more effective than analytic instruction (Ehri, Nunes, Stahl, & Willows, 2001; Johnston et al., 2012)? What are the effects of reading decodable books versus natural text on learning to read (Moats, 2017; Price-Mohr & Price, 2020; Solity & Vousden, 2009)? However, none of these questions negate the evidence that initial decoding instruction should be explicit, systematic, and focused mainly on grapheme–phoneme correspondences.

The most developed critique of explicit, systematic phonics has been that of Bowers (2020). His key argument appears to be that the effect of systematic phonics instruction, estimated by comparing it to unsystematic instruction, is small. However, unsystematic phonics instruction itself produces a small effect on learning, and systematic phonics produces a gain relative to this, resulting in an overall effect that is reliable and medium in size. Consequently, from a practical point of view, there is no reason to give up the incremental benefit resulting from a systematic, rather than an unsystematic, approach. The issue of relative effect sizes was debated in depth by Bowers (2020) and Fletcher et al. (2021), so I will refer readers to that exchange and not repeat it here. I will pick up on two related issues instead.

First, as part of Cummins's critique of systematic phonics instruction, he objects to "stand alone programs," arguing that phonics should be contextualized (2022, p. 89–90). The problem with this critique is that the terms "stand alone" and "contextualized" are ambiguous, depending on the scope within which integration is meant to take place. On one hand, if Cummins means that students should apply phonics skills to read and write texts, then this is uncontroversial (e.g., OHRC, 2022b, p. 21). On the other hand, if Cummins means that a literacy program should not include lessons that focus specifically on phonics, his key citation would undermine this claim. He discusses Gray et al. (2021), who reported on the Zoology One: Kindergarten Research Labs program (now called ARC Core Kindergarten), which integrates hands-on science learning with large volumes of self-selected reading and written expression. The researchers found that this approach produced significant gains in comprehension, letter-naming fluency, and motivation to read (Gray et al., 2021). The program and its results are impressive; however, they do nothing to cast doubt on the R2R Report. ARC Core Kindergarten is not fully integrated; rather, some lessons and activities combine science and literacy (e.g., writing about the life cycle of insects), while other lessons and activities focus on decoding alone (e.g., a lesson on using onset and rime to decode words in the "-all" family). The program includes as a teacher resource the classic Phonemic Awareness in Young Children by Adams et al. (1998). Phonics instruction is explicit, in that students are directly taught, practice, and receive feedback on decoding and spelling words. Also, although it is analytic rather than synthetic, it is nonetheless systematic; the sequence of assessment and instruction is based on a typical progression, overlapping that recommended in the R2R Report: initial consonants, blends and digraphs, single syllable words followed by more complex orthography, and multisyllable words and morphology as students progress through the grades. So the Gray et al. (2021) study makes the important point that a program of explicit systematic phonics instruction can be integrated with extensive reading and writing across the curriculum to positive effect. However, this supports and extends, rather than negates, the explicit, systematic approach recommended in the R2R Report.

In a second related point, Cummins criticizes intensivity, seemingly attributing it to programs that are systematic and explicit (pp. 89). Fortunately, such instruction need not be lengthy—this is one of the non-obvious and educationally useful findings that have emerged from experimental research on phonemic awareness and phonics instruction. For example, in the Ehri, Nunes, Willows et al. (2001) meta-analysis of phonemic awareness programs, the largest effect sizes were obtained with instruction of moderate duration: 5 to 18 hours total. Similarly, a recent meta-analysis of students learning to read in L2 has shown that phonics programs of moderate duration have similar effect sizes to programs of longer duration (Murphy Odo, 2021); a similar pattern was found for Kindergarten and Grade 1 students learning phonemic awareness (Rice et al., 2022). Consistent with this, the *R2R Report* does not call for lengthy instructional sessions, and the recently launched Ontario curriculum resource, *Effective Early Reading Instruction: A Teacher's Guide*, recommends "discrete and relatively short sessions for instruction throughout

the day, e.g., in 15 minute blocks" (MEPO, 2022, p. 13). So here too, Cummins makes a legitimate educational point but one that does not comprise a critique of the *R2R Report*.

What Cummins Missed: The *R2R Report* Will Move Ontario Special Education Policy into the 21st Century

Cummins's off-target criticisms potentially divert readers' attention to outdated controversies. These criticisms distract from the real significance of this report. Ontario's special education policy has long been stuck in the 1980s. The *R2R Report* introduces five kinds of innovations that could move Ontario policy into the 21st century.

The first innovation is that the OHRC has, for the first time, made research the driving force for special education policy in Ontario. An earlier attempt in this direction was made in *Education for All: The Report of the Expert Panel on Literacy and Numeracy Instruction for Students with Special Education Needs, Kindergarten to Grade* 6 (MEPO, 2005). However, subsequent key documents, notably *Learning for All: A Guide to Effective Assessment and Instruction for All Students, Kindergarten to Grade 12* (MEPO, 2013) and *Special Education in Ontario: Kindergarten to Grade 12. Policy and Resource Guide Draft* (MEPO, 2017), profoundly diluted the 2005 pro-research stance. Instead, these two key documents focus on elaborating policy and advocating selected practices, with very little reference to research on literacy development, evidence-based instruction, assessment, or the psychology of learning disabilities. As a result, Ontario missed the opportunity to move forward in these dimensions of special education. In contrast, the *R2R Report* concisely weaves together a copious amount of classical and recent research to offer a clear path toward inclusive education in reading.

Secondly, the *R2R Report* introduces a contemporary understanding of learning disabilities. Ontario policy documents have largely treated learning disabilities as generic. In some key documents, the terms "dyslexia" and "learning disability" do not appear (e.g., MEPO, 2013). Other documents acknowledge that learning disabilities can occur in various domains, such as reading, but fail to specify the patterns of strengths and deficits associated with each or connect them to corresponding practices for assessment and intervention (e.g., MEPO, 2005, 2017). In contrast, the *R2R Report* is based on the contemporary conception that each type of learning disability is comprised of atypical development in a specific domain. For example, the report calls for the use of the term "dyslexia" to refer to a learning disability in reading, recognizing that for most students with this disorder, core deficits include phonemic awareness and rapid automatized naming; it then connects these to appropriate assessment and intervention practices. In this way, the *R2R Report* provides a model for effective inclusive education, which the OHRC and Ministry of Education can now extend to other types of exceptionalities, such as dyscalculia and social and emotional disorders, as well as to students without disabilities who struggle in these areas.

In a third innovation, the *R2R Report* modernizes assessment. During the OHRC public inquiry, family after family attested to waiting years for psychoeducational assessments, some of which never came (OHRC, 2022b, p. 55). In many boards of education, before receiving service, students were required to receive a psychoeducational assessment showing a significant discrepancy between an average or above average intelligence test score and a below average reading score. This approach was largely debunked more than two decades ago, most notably in the classic review *The Impending Demise of the Discrepancy Formula* (Aaron, 1997). Among the many problems of the discrepancy formula, one was that students could not be assessed until Grade 3 or later, resulting in counter-productive delays in intervention. Previous special education documents in Ontario have acknowledged the value of early assessment and intervention (e.g.,

MEPO, 2005, 2013, 2017), but the *R2R Report* shows that this did not translate into widespread early access to service. The *R2R Report* introduces a suite of contemporary best practices in assessment: students are to be assessed early; they will be able to access intervention without a psychoeducational assessment or a diagnosis of dyslexia; and a diagnosis of dyslexia will be based on a streamlined and focused process using a set of language and literacy assessments.

Fourthly, the R2R Report modernizes intervention. Traditionally, special education guidelines in Ontario have failed to address the specific deficits associated with each type of exceptionality. Education for All (MEPO, 2005, pp. 102-106) attempted a step in the right direction, briefly outlining interventions in reading. However, this approach was subsequently abandoned in Learning for All (MEPO, 2013), as well as in the subsequent Special Education in Ontario policy document (MEPO, 2017), both of which continue to be used in Ontario. Unbelievably, this latter document recommended no decoding interventions for students with dyslexia or other struggling readers; no math interventions for students with dyscalculia and other students struggling in mathematics; and no social and emotional interventions for those with needs in that domain (although it did refer teachers to another document). Rather, Learning for All (MEPO, 2013) provided some instructional recommendations, such as universal design for learning (UDL), that are reasonable; however, in themselves, they are too general to be of any real use. More problematically, Learning for All (MEPO, 2013) presented recommendations, such as matching the modality of instruction to students' supposed visual and verbal learning styles, that have been disconfirmed by decades of research (Kavale & Forness, 1987; Willingham et al., 2015). In contrast, the R2R Report moves Ontario policy forward by providing recommendations that directly address the literacy needs of students with dyslexia and other struggling readers. These are now being advanced through the new Ministry of Education document, Effective Early Reading Instruction: A Teacher's Guide (MEPO, 2022).

Fifthly, the *R2R Report* modernizes frameworks for delivery. During the past two decades, RTI/MTSS has emerged as a best practice for delivering inclusive education. In Ontario, RTI has been repeatedly recommended in previous documents (MEPO 2005, 2013, 2017). However, as the *R2R Report* demonstrates, it has not been widely implemented. Perhaps this time, it will be funded and adopted.

Conclusion

Cummins's response to the *R2R Report* includes some constructive elements, such as his support for reforming education for students with dyslexia and for reading instruction that balances phonics education with extensive self-selected reading and reading across the curriculum. However, much of Cummins's response is comprised of common critiques, such as PINAP and OSDFA, which are simply inapplicable to the *R2R Report*. The OHRC has made recommendations that are evidence-based, sweeping, practical, and contemporary. These could elevate special education policy in Ontario to a new level, introducing for the first time a guiding role for research, a contemporary conception of learning disabilities, a valid approach to assessment, an evidence-based approach to intervention, and an efficient framework for inclusive delivery of literacy education. The *R2R Report* should be taken as a model for developing policy that serves students struggling in other domains, such as mathematics and social and emotional learning. As the executive report concludes, "It is time for change" (OHRC, 2022b, p. 68).

Author Bio

Perry Klein began his career as a teacher in North York, Ontario. He completed a PhD in Applied Educational Psychology at the Centre for Applied Cognitive Science at the University of Toronto. He joined the Faculty of Education at Western University, teaching courses on educational psychology and literacy education for struggling readers and writers. He has served as Chair of Applied Psychology in the Faculty of Education and Associate Dean (Research). For much of his career, he conducted research on the processes through which writing contributes to learning and on methods that could be used to enhance learning through writing. Subsequently, he has led a team in a research project on *Early Intervention in Writing*. This project, funded by a SSHRC Insight Grant, takes an evidence-based approach to four questions: How can we teach writing strategies and self-regulation to beginning writers? How can we make writing education more effective for struggling writers, including students with learning disabilities? How can writing instruction be organized to make it inclusive and effective? How should instruction in written expression and mechanics be sequenced, balanced, and integrated?

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