

Legislative Audit Response

K-3 Literacy Audit Response

A Briefing for the Utah Legislature Audit Subcommittee

Context: A Framework Revised

SB 127 established a multi -year implementation timeline . SB 241 clarified roles and strengthened the framework during the audit period.

⚠ Key point: SB 241 substantially revised USBE's responsibilities.

- 2004 ● Utah Legislature begins K -3 literacy programs
- 2022 ● SB 127 — Early Literacy Outcomes Improvement
Sets 70% third-grade proficiency goal by 2027; multi-year implementation begins
- 2022–2025 ● USBE and LEAs implement SB 127
Confusion arises from dual benchmark measures: above benchmark vs. at-or-above benchmark
- 2026 ● SB 241 — Early Literacy restructures the framework
Raises goal to 80% proficiency by 2030 · Clarifies measurement to at-or-above benchmark · Redefines roles of USBE and LEAs

Audit diagnosis: The state lacks the data infrastructure and role clarity to determine whether science of reading investments are improving outcomes.

SB 241 Roles

SB 241 created a clear division of responsibility: LEAs own instruction and results; USBE sets expectations, provides guidance, and monitors statewide outcomes.

LEAs Are Responsible For

- Curriculum selection within statutory parameters
- Intervention delivery and school-level instruction
- School-level monitoring and accountability
- Producing student outcomes

USBE Is Responsible For

- Setting clear statewide expectations aligned with statute
- Updating Board Rules to reflect SB 241 requirements
- Providing guidance for local implementation
- Monitoring and publicly reporting statewide outcomes
- USBE is accountable for statewide transparency

⚠ What this means: USBE accountability role is system -level and outcome -focused.

Measuring Outcomes, Not Activity

We are shifting from measuring what we did to measuring whether students learned.

Before

Activity Accountability

- Counting trainings completed
- Tracking programs funded
- Reporting participation rates
- Measuring inputs and compliance



Going Forward

Outcome Accountability

- ✓ Measuring student proficiency growth
- ✓ Evaluating program return on investment against literacy scores
- ✓ Holding the system accountable for third -grade reading benchmark attainment
- ✓ Building data infrastructure that connects teacher training to student results

☞ *We are not adding more programs. We are building a system where everything we do is measured by whether students learn to read.*

Response Framework Overview

USBE's response is organized around four commitments, each directly addressing an audit dimension.

1



Clear Expectations

Set unambiguous statewide standards and update all Board Rules to align with SB 241.

SB 241 substantially revised USBE's early literacy responsibilities. Policy and Literacy teams will review all Board Rules related to science of reading and recommend updates through standing committee to full Board.

What the updated rules will clarify:

USBE's role in outcome monitoring vs. LEA role in instructional delivery

- ✓ At-or-above benchmark as the statewide standard measure
- ✓ 80% third-grade proficiency goal by 2030
- ✓ Performance-informed technical validation model for curriculum review

2



Data Transparency

Build data infrastructure to link teacher training to student outcomes; require standard identifiers across all literacy data.

Require standard identifiers (including CACTUS numbers) in all literacy-related data reporting — by USBE, LEAs, and applicable vendors.

Update vendor contracts and Board Rules to mandate standard identifiers across all literacy programs and vendors.

Publish updated literacy program recommendation list based on student outcome criteria — not program features.

Develop business rules ensuring all literacy program reviews are based on student proficiency data — not participation counts.

3



Coherent System of Support

Align the SOR Panel, higher education, LEAs, and USBE around student proficiency as the single measure of success.

Audit Finding: Science of reading personnel and resources are underutilized; collaboration lacks focus on outcomes

Charge the SOR Panel
Formally task the six -member SOR Panel to define research parameters, KPIs, and statistical methodology for longitudinal analysis

Standing Proficiency Agenda Item
Every meeting agenda with literacy stakeholders will include a standing item on student proficiency — discussed as soon as data is available

Higher Education Data Agreements
Work with Utah Board of Higher Education and Educator Preparation Programs to establish data-sharing agreements linking teacher candidate training to K –12 student outcomes

SOR Faculty Role Clarity
Establish guidelines for SOR faculty role statements to account for time on statewide literacy initiatives — Board Rule update by September 2027

4



Implementation Discipline

Require proctored assessments, program reviews based on student outcomes, and SOPs that prioritize proficiency.

Audit Finding: L iteracy program recommendations have not consistently required demonstration of student outcome impact.

Dr. Molly Hart, Ed.D. | State Superintendent of Public Instruction | Utah State Board of Education | June 16, 2026

We will rebuild implementation standards so that program s, vendor s, and training s are selected and evaluated based on its impact on student proficiency.



Action 1 — Update SOPs for Program Review

Revise standard operating procedures for reviewing and recommending literacy programs — student proficiency is the primary criterion.



Action 2 — Review & Republish Program List

Review all currently recommended programs against student outcome criteria; publish updated recommendation list.



Action 3 — Require Proctored Assessments in Future RFPs

In future RFPs for SOR training, require vendors to guarantee proctored assessments.



Action 4 — Update Vendor Contract Terms

Update contract terms to require proctored assessments for all literacy training vendors.

 The Standard

If a program cannot demonstrate student proficiency impact, it will not receive USBE recommendation.

Audit Recommendations Approach

Where audit recommendations aligned with our statutory authority, we are implementing them. Where statute constrains us, we have taken alternative actions that fulfill the same intent.

Directed to LEAs

Recommendations directed to LEAs will be enforced through USBE expectations, monitoring, and public reporting under SB 241.

Implementing

Direct Implementation

- ✓ **Rec. 2.1** — Standard data identifiers across all literacy reporting
- ✓ **Rec. 2.3** — Proctored vendor assessments required in future RFPs and contracts
- ✓ **Rec. 2.4** — Student proficiency as primary measure for program recommendations
- ✓ **Rec. 2.5** — SOR faculty role clarity established with USHE

Alternative Action

Statute -Constrained

- ➔ **Rec. 1.3** — Curriculum approval for high -performing LEAs: Cannot waive statutory SOR requirements. Alternative: performance -informed validation model through SOR Panel
- ➔ **Rec. 2.2** — Link teacher training to student outcomes: Requires data infrastructure and funding not currently available. Alternative: phased approach with higher ed partnerships + legislative appropriation request
- ➔ **Rec. 2.6** — Improve SOR Panel collaboration. Alternative: every meeting agenda requires a standing student proficiency item

Curriculum Example: The SOR Panel Validation Model

The SOR Panel's performance -informed validation model is how we honor both high -performing LEA innovation and the statutory science of reading requirements.

Audit Recommendation

Approve curriculum combinations used by LEAs achieving the 80% goal for 2+ consecutive years.

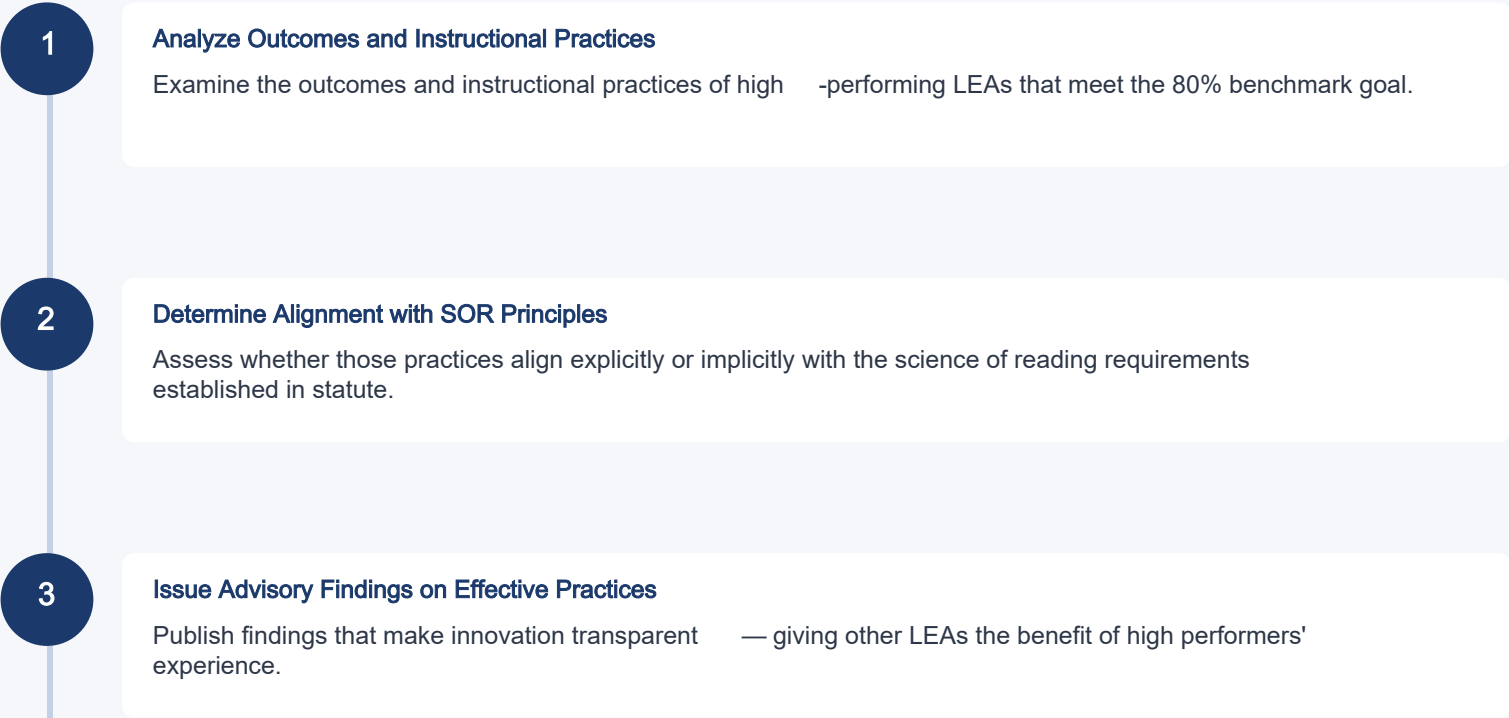
USBE's Statutory Constraint

SB 241 established specific science of reading curriculum requirements in statute — USBE cannot waive them, even for high-performing LEAs.

Outcome

- ✓ High performers get recognized.
- ✓ Innovation gets examined.
- ✓ Statute gets honored.

USBE's Alternative — SOR Panel Validation Model



 **Dashboard Indicator:** USBE will flag on public dashboard when an LEA using materials outside the published SOR - aligned list meets statutory science of reading requirements.

Closing the Data Gap

SB 241 funded literacy programs but not the data infrastructure to measure them — a targeted appropriation for USBE closes the gap and delivers outcome accountability.

\$16M

Allocated to LEAs, RESAs & charter schools
— for programs

\$0

Allocated to USBE for data infrastructure —
no analyst capacity, no matching framework

The Legislative Ask

**Targeted appropriation — one-time or ongoing
— for USBE to build and maintain longitudinal
literacy data infrastructure**

- Dedicated data science staff or external research contracts
- Secure, FERPA-compliant data-matching framework
- Merge UFORA, LETRS & K-12 student assessment datasets
- Baseline and ongoing impact reporting to the Legislature

What It Delivers

- Fall 2027 baseline report linking teacher training to student literacy outcomes
- Documented ROI on SB 241's \$16M investment in the field
- Fulfills Audit Recommendation 2.2 — outcome accountability becomes measurable