

A Performance Audit of

Public Education K-3 Reading Programs

Analyzing Outcome Measures, Data
Quality, and Student Progress

Office of the Legislative
Auditor General

Report to the UTAH LEGISLATURE







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June, 16, 2026

TO: THE UTAH STATE LEGISLATURE

Transmitted herewith is our report:

“A Performance Audit of Public Education K-3 Reading Programs” [Report #2026-12].

An audit summary is found at the front of the report. The scope and objectives of the audit are included in the audit summary. In addition, each chapter has a corresponding chapter summary found at its beginning.

[Utah Code 36-12-15.3\(2\)](#) requires the Office of the Legislative Auditor General to designate an audited entity’s chief officer (CO). Therefore, the designated COs are:

- Superintendent Molly Hart, Utah State Board of Education
- Commissioner Geoffrey Landward, Utah System of Higher Education

Each designated CO has been notified that they must comply with the audit response and reporting requirements as outlined in this section of **Utah Code**. Additionally, the CO for the Utah School Superintendents Association will act as a liaison between our office and the state’s local education agencies as we follow up on recommendations directed at the local level.

We will be happy to meet with appropriate legislative committees, individual legislators, and other state officials to discuss any item contained in the report in order to facilitate the implementation of the recommendations.

Sincerely,

Kade R. Minchey, CIA, CFE

Auditor General

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PERFORMANCE AUDIT

A PERFORMANCE AUDIT OF PUBLIC EDUCATION K-3 READING PROGRAMS

AUDIT REQUEST

In October 2025 the Legislative Audit Subcommittee requested a review of the effectiveness of reading programs in public education. This audit request outlined a specific focus on K-3 literacy programs, resource allocation and use of evidence-based practices, monitoring and evaluation practices used to track program success, and teacher training.

BACKGROUND

Over the past 22 years the Legislature has implemented and sought to improve programs supporting K-3 literacy in Utah. Senate Bill 127, passed during the 2022 General Session, aimed to align schools, higher education, and communities around evidence-based literacy practices. One primary goal of the bill was to achieve 70% of students reading at grade level by the end of third grade by 2027.



KEY FINDINGS

- ✓ For the last 7 of 9 years, at least 70 percent of students have been proficient. However, there has been no sustained statewide improvement in its 3rd grade literacy scores.
- ✓ USBE and LEAs can improve their use of student assessment data to address instructional strengths and weaknesses.
- ✓ Strengthening first-grade reading outcomes could help reduce the number of students who need extra support in second and third grade.
- ✓ Teacher training programs appear to have little impact on student literacy scores, but data limitations are preventing more robust analysis from being done.
- ✓ Schools with legislatively-funded literacy coaches are seeing mixed results for their student assessment scores.
- ✓ School administrators can have a significant impact on student achievement.



RECOMMENDATIONS

- ✓ **1.1** Every local education agency should hold its schools accountable for early literacy goal setting and goal achievement.
- ✓ **2.4** Utah State Board of Education leadership should set the tone for statewide focus on student growth and ensure that the measure of success for student literacy programs is their impact on student proficiency.
- ✓ **2.5** The Utah State Board of Education and Utah System of Higher Education should work with university-based Educator Preparation Programs to ensure that science of reading faculty have clear role statements.
- ✓ **3.1** Local education agencies should establish clear evidence-based metrics for determining the effectiveness of a school leader and then provide adequate support and accountability.



REPORT SUMMARY

Early Literacy Benchmark Was Met, But Lack of Movement Needs Attention

While Utah performs well, we have not improved as a state in terms of percentage of students meeting benchmark. When looking at grade level scores over time and scores by cohort, we see the lowest percentages in first grade. A widespread effort is needed to address this gap.

Science of Reading Investments Should be Linked to Student Outcomes to Ensure Best Results for Utah Students

USBE and Utah universities have made measurable progress in the percentage of teacher candidates passing the reading foundations assessment.

However, the state currently lacks the data infrastructure and role clarity needed to determine whether these science of reading investments are improving student outcomes.

Accountability and Outcome Measures Are Needed to Help Improve Student Literacy Achievement

Schools with literacy coaches that have involved school administrators have seen greater improvement in the percentage of students meeting the Acadience Reading Benchmark since the implementation of the bill. An effective principal can positively impact a school, and it is the responsibility of each LEA to ensure schools are staffed with effective principals.

At Least 70% of Utah's 3rd Grade Students Have Met Benchmark in Recent Years

Senate Bill 127 allocated funding and resources to ensure that 70% of 3rd grade students are reading proficiently by the 2027 school year. As a state, we regularly have a high percentage of students leaving 3rd grade meeting grade level reading benchmarks. However, we have struggled to see sustained statewide improvement despite legislative focus and investments.

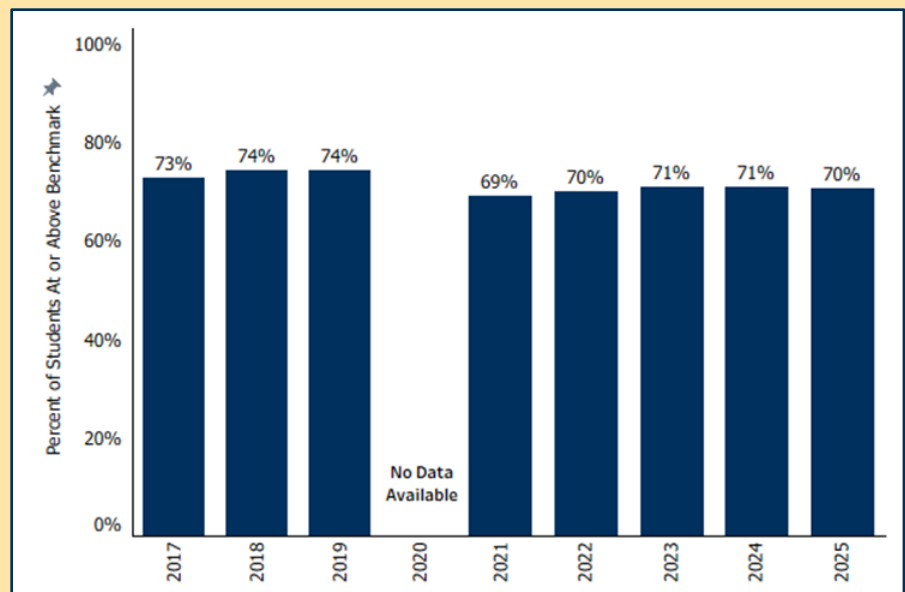


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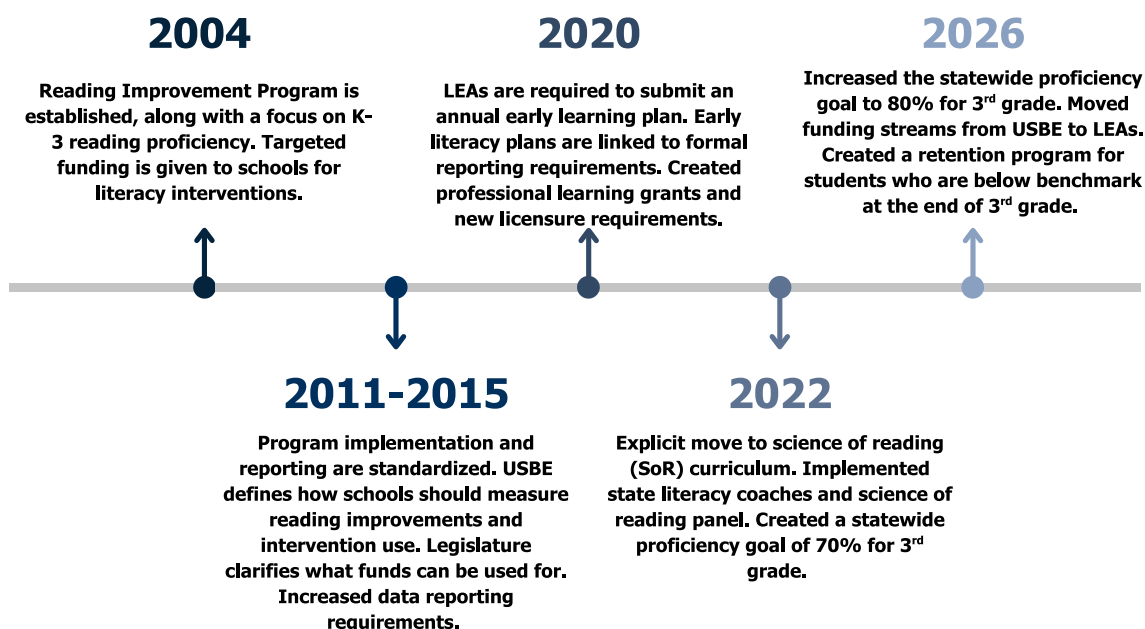
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Introduction

In 2004, the Utah Legislature began implementing literacy programs focused on K-3 reading proficiency. Over the past 22 years, the Legislature has continued to implement new programs, adjust funding and reporting requirements, and express concern over plateaued reading scores. The following infographic outlines the timeline of changes that have been made.



Source: Auditor generated.

Senate Bill (S.B) 127, Early Literacy Outcomes Improvement, from the 2022 General Legislative Session, set a goal for 70% of students statewide to reach proficiency in third-grade testing. The purpose of this goal was to promote growth in student literacy assessment scores. Following the 2022 bill, the Utah State Board of Education (USBE) defined reading at grade level as scoring above benchmark on the Acadience assessment. However, some USBE documentation used a threshold of at or above benchmark for other assessments and reporting. This required schools and local education agencies (LEAs) to track two different measurements: at or above benchmark and above benchmark. S.B. 241, Early Literacy, from the 2026 General Legislative Session, clarifies that schools and



LEAs should be tracking the at-or-above-benchmark measure. The bill also increases the statewide goal to 80% proficiency.¹

While Acadience is the primary assessment tool used to measure K-3 literacy progress, third-grade students in Utah are also required to participate in Readiness Improvement Success Empowerment (RISE) testing. Both Acadience and RISE measure literacy or language arts, but the two tests serve different purposes.

	Acadience	RISE
What is it for?	• Early literacy achievement and progress monitoring tool • Used to identify reading risk early and track growth	• Summative assessments to help teachers adjust programs for future students • Measures overall proficiency in grade-level standards
Who takes it?	• All students K-3 are required to take it, but can be given K-6 • Given 3 times per school year (beginning, middle, and end)	• All students grades 3-8 • Includes a midyear interim assessment and end-of-year summative assessment
What does it measure?	• Foundational skills, including oral reading fluency, accuracy, and basic comprehension	• Grade-level English Language Arts (ELA) performance, including literacy comprehension, informational texts, and reading standards
How should the data be used?	• Drives day-to-day instruction • Can help to group students for intervention, adjust instruction immediately, and monitor growth over time	• Evaluates year-end learning and system effectiveness • Can help to determine student proficiency, evaluate teacher performance, and inform policy and accountability systems

Source: Auditor generated.

¹ The term *benchmark* is used in this report to match the terminology used by the Acadience Reading Assessment. The assessment has four achievement levels: Well Below Benchmark, Below Benchmark, At Benchmark, and Above Benchmark.



Utah performs well on student literacy assessments when compared to other states. However, the Legislature has expressed a desire to ensure all Utah students are proficient readers. The legislative efforts previously outlined, as well as the resources and funding discussed throughout this report, reflect this desire. Statewide literacy efforts will be successful when Utah sees positive growth in student literacy scores and achieves or surpasses its proficiency goals. A lack of growth is the primary reason that our office was asked to conduct this audit. In the following chapters we present the trend of statewide literacy numbers along with recommendations for improvement.





BACKGROUND

Utah has prioritized improving early literacy in recent years. Part of that work was an expectation for 70% of third graders to be proficient by 2027. The Legislature updated the target to 80% by 2030. The new goal also specifies that it is based on the percentage of students that score at or above benchmark on the end-of-year Acadience Reading assessment.

FINDING 1.1

The Percentage of Students Reaching Benchmark Has Lacked Movement

RECOMMENDATION 1.1

Every local education agency should hold its schools accountable for early literacy goal setting and goal achievement. While accountability processes will vary to meet local needs, goal setting and assessing progress should happen at least three times a year following Acadience Reading administrations.

FINDING 1.2

Examining LEAs and Schools Meeting the New 80% Goal Provides Useful Insight

RECOMMENDATION 1.2

Local education agencies should ensure that they are addressing all six science of reading areas through early literacy curriculum(s).

RECOMMENDATION 1.3

The Utah State Board of Education should approve the specific combination of curriculum as a unit for any local education agency that meets the 80% goal for at least 2 consecutive years.



CONCLUSION

While Utah performs well on reading assessments, there has been no sustained statewide improvement in the percentage of students meeting the benchmark in at least nine years. When looking at grade-level scores over time and scores by cohort, we see the lowest percentages in first grade. We spoke with one school that has identified this issue in their data and has been working to address it. However, a more widespread effort is needed.





Chapter 1

Early Literacy Benchmark Was Met, But Lack of Movement Needs Attention

In Senate Bill (S.B.) 127 from the 2022 General Legislative Session, the Utah Legislature set a goal for 70% of third-grade students to be proficient in reading by 2027. Following the bill's passage, the Utah State Board of Education (USBE) defined proficiency as scoring above benchmark.² S.B. 241, passed during the 2026 General Legislative Session, resolved confusion by specifying that the goal was based on students scoring at or above benchmark. With this change, the goal was increased to 80%. Utah now needs to improve its performance to meet the higher goal.

When looking at data grouped by each cohort of students across the state,³ it is apparent that first grade has the fewest students meeting grade-level reading requirements. We believe the gap in performance on first-grade reading tests contributes to the state's lack of movement in third grade, due to more students entering second grade needing interventions. Therefore, each local education agency (LEA) and school should use available data to identify gaps and be held accountable for addressing them.

1.1 The Percentage of Students Reaching Benchmark Has Lacked Movement

Overall, Utah performs fairly well on the Acadience Reading assessment with at least 70% of third-grade students scoring at or above benchmark.⁴ However, scores have remained stable for seven of the last nine years. Reasons for this can vary by LEA or school, but we do see a statewide trend of lower benchmark percentages in first grade. The introduction of reading passages in the first-grade assessment yields lower percentages than the test that has students read isolated words. Schools should use available data to set meaningful goals and implement action steps to target the statewide performance gap and other gaps found in

² USBE revised the definition for reading on grade level in May 2026. It now defines reading on grade level to be at or above benchmark.

³ A cohort of students is a group that entered kindergarten in the same school year. For example, the students that entered kindergarten in 2017 are considered cohort 1.

⁴ Students that meet or exceed their Acadience reading benchmark have a likelihood of 70% or higher on reaching future benchmarks. The higher their score above the benchmark cut score, the greater their likelihood.

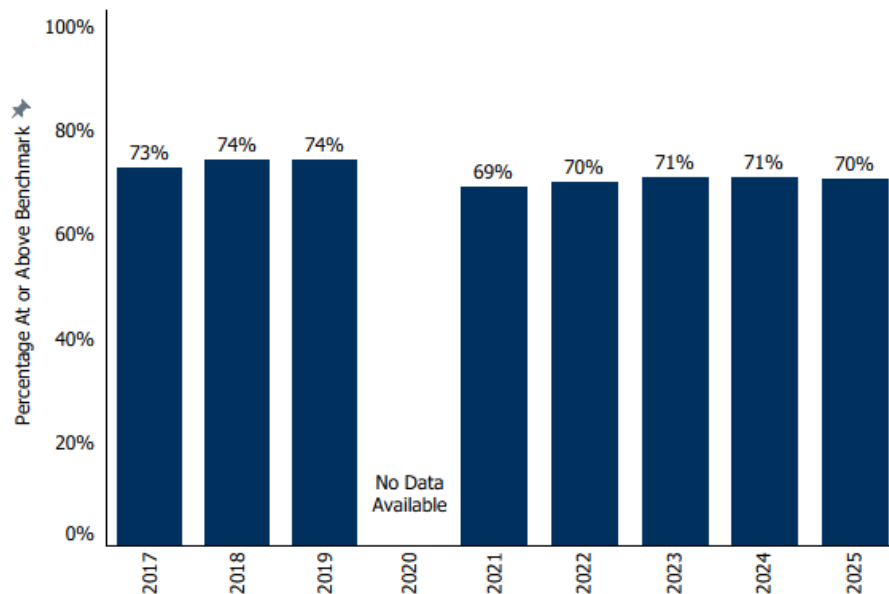


their school. If existing achievement gaps are not closed, the state is at risk of missing the 80% goal of third graders meeting the reading benchmark by 2030.

Addressing Lower First-Grade Scores Can Improve Third-Grade Rates

S.B. 127 allocated funding for resources to ensure that 70% of third-grade students are reading proficiently by the 2027 school year.⁵ Figure 1.1 shows the statewide percentage of third-grade students that have met the reading benchmark since 2017.

Figure 1.1 At Least 70% of Utah's Third-Grade Students Have Met Benchmark for 7 of the Last 9 Years. A high percentage of students leaving third grade are meeting grade-level reading benchmarks.



Source: Auditor generated based on USBE data.

*Note: There is no data for the 2020 school year due to testing not being administered.

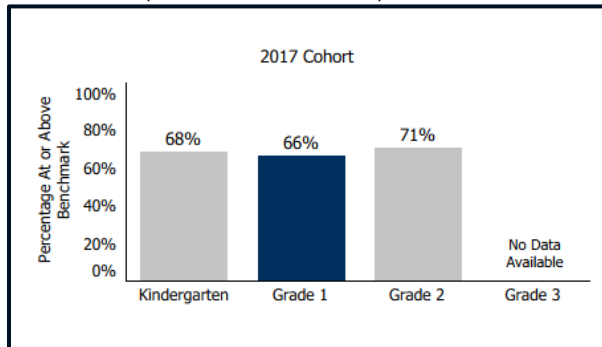
To determine why the third-grade rates have remained fairly static over time, we looked at each group of students as they moved from kindergarten through third grade. Results from the Acadience Reading assessment show that first grade has the lowest percentage of students meeting or exceeding the benchmark. While kindergarten has shown more improvement over time, first grade has not had the same gains. Strengthening first-grade reading outcomes could help reduce the number of students who need extra support in second and third grades.

⁵ S.B. 241 — Early Literacy, from the 2026 General Legislative Session, reworded the requirement for proficiency to students that are scoring at or above benchmark on the Acadience Reading assessment.

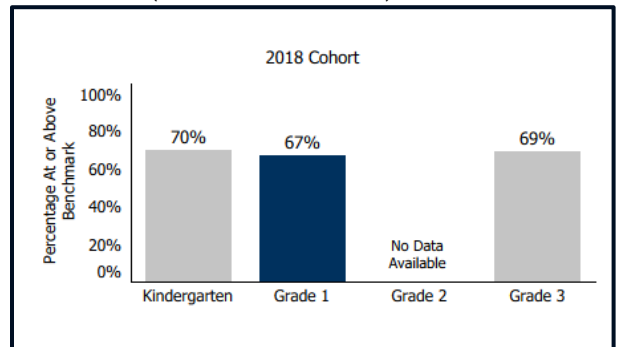


The visualizations below show how each cohort performed on the Acadience Reading assessment in the early elementary grades. As a note, end-of-year test data does not exist for 2020, so cohorts that include the 2020 school year will have missing data.

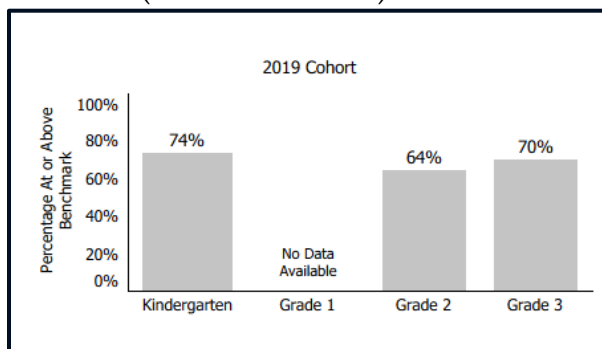
Cohort 1 (3rd Grade—2020)



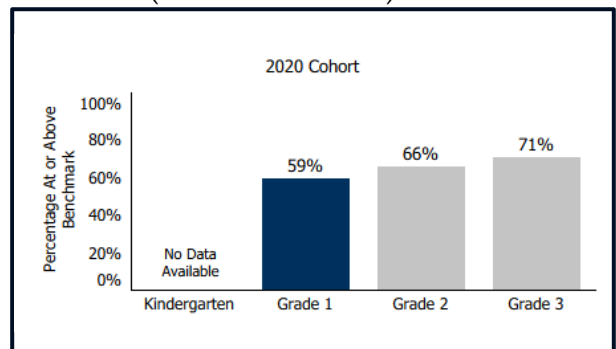
Cohort 2 (3rd Grade—2021)



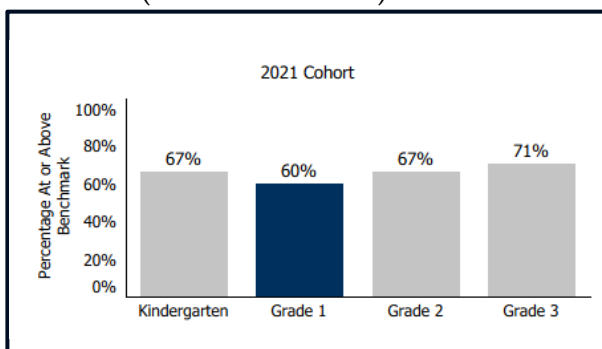
Cohort 3 (3rd Grade—2022)



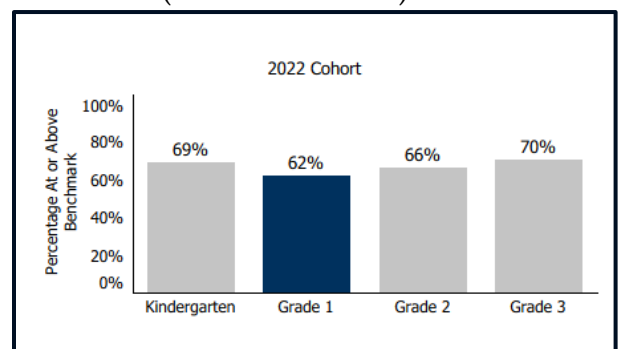
Cohort 4 (3rd Grade—2023)



Cohort 5 (3rd Grade—2024)

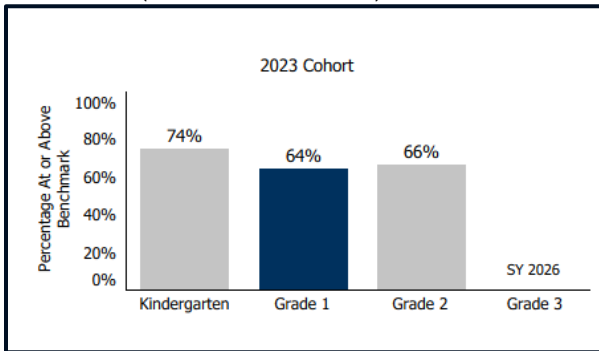


Cohort 6 (3rd Grade—2025)

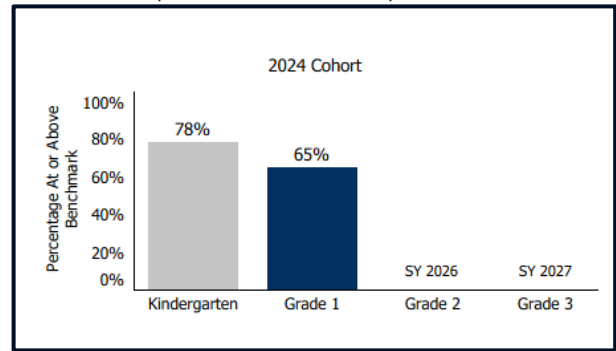




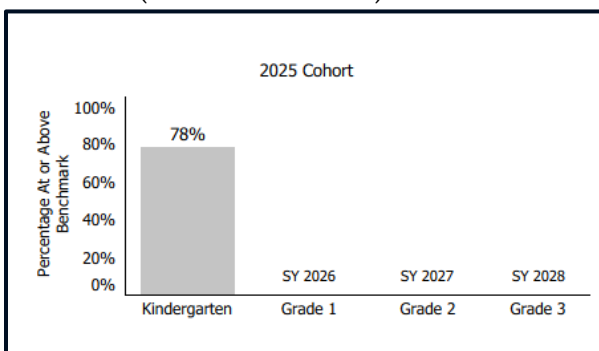
Cohort 7 (3rd Grade—2026)



Cohort 8 (3rd Grade—2027)



Cohort 9 (3rd Grade—2028)



Source: Auditor generated based on USBE data.

In the above visualizations, first-grade performance is colored blue to highlight the grade with the lowest percentage of students meeting grade-level benchmarks. To improve the percentage of students meeting reading benchmarks in the second and third grades, we need to address the lower outcomes in first grade.

Our *Root Causes Handbook*⁶ illustrates the need for identifying the reason(s) for a gap in performance and then making recommendations to address it. Identifying cause is particularly important when the outcomes are based on student learning and achievement. It is essential that LEAs continually identify causes and implement interventions where there is lower achievement, as in first grade Acadience Reading.

⁶ The Office of the Legislative Auditor General (OLAG) produced a best practices handbook with a focus on identifying root causes. The report is found here: https://pf.utleg.gov/olag/reports/audits/2026/3f600bb4-e1fa-4694-a0d5-7f90721b8eab/2026-04_RPT.pdf.



OLAG's Root Causes Handbook:

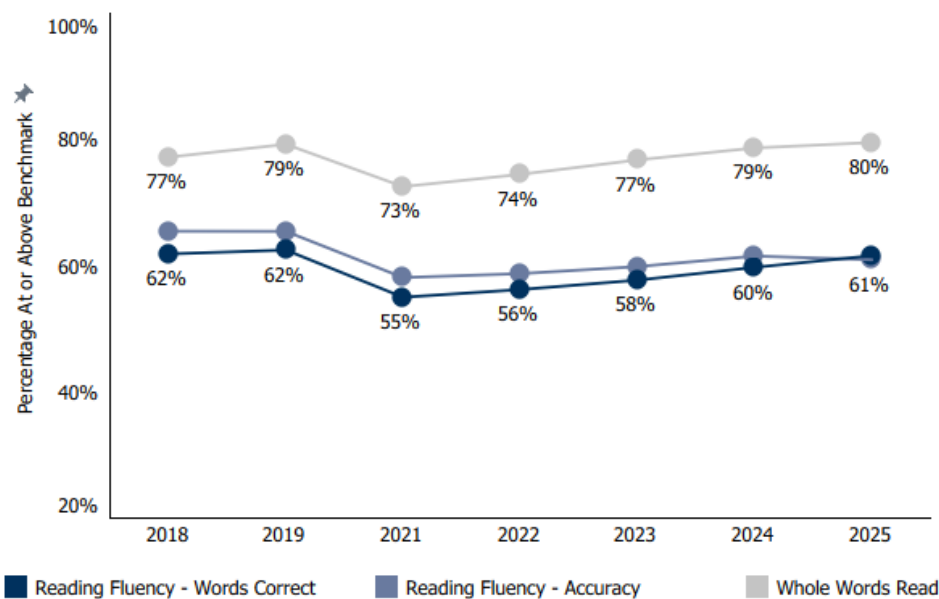
"Organizations must simultaneously deliver products and services and evaluate the efficiency and effectiveness of those products and services. Dr. W. Edwards Deming, a prominent organizational theorist, taught, 'Every system is perfectly designed to get the result that it does' " (p.4).

Available Data Can Help LEAs Identify and Address Areas of Lower Achievement

Our office used the Acadience Reading data stored by USBE to produce the visualizations in this chapter. USBE also provides the same raw data to each LEA through a Tableau Server. USBE and LEAs should be using this data to determine strengths and weaknesses and then target gaps with informed actions.

An analysis of first-grade assessment data indicates that reading fluency is a primary driver of fewer students meeting the benchmark. While students demonstrated relatively stronger results in the other assessed area, reading fluency scores were consistently lower. As shown in Figure 1.2, this gap suggests early literacy instruction may not be adequately supporting the development of foundational reading skills.

Figure 1.2 First-Grade Students Are Performing Lower on Reading Fluency Tests Compared to "Whole Words Read." The two blue lines below the gray line represent the reading fluency tests students take in first grade.



Source: Auditor generated based on USBE data.



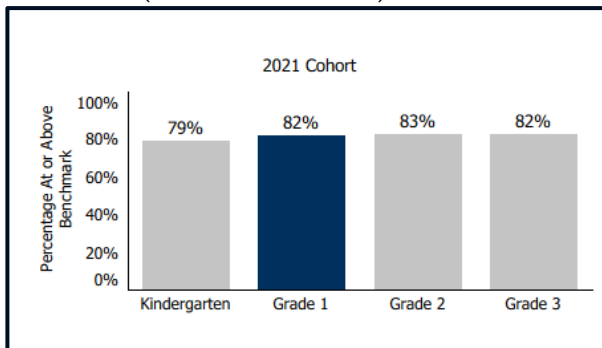
Figure 1.2 shows a gap between the “Whole Words Read” category and the two reading fluency categories. The latter categories are introduced at the middle-of-year test session for first grade. They consist of grade-level passages of text that the students have not seen prior to the assessment. The students have one minute to read as much of a passage as possible. The process is repeated three times with three different passages.

One first-grade team reported to us on their efforts to strengthen reading achievement. This team, along with their administration, reportedly noticed a gap in performance, and as a result, increased their efforts with the reading fluency categories. Their improvement efforts include the following:

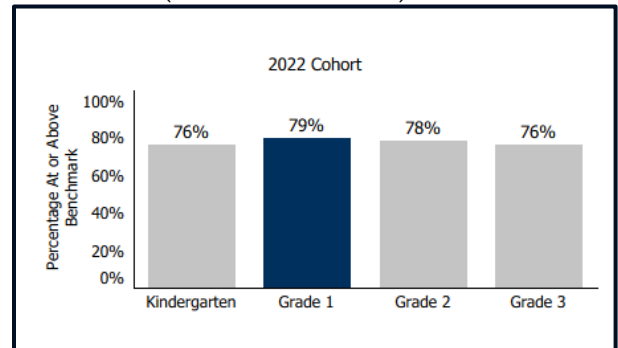
- They have structured their reading lessons and activities in a way that requires at least 80% of their students to demonstrate proficiency with a concept before they move on to the next one. Once 80% proficiency is met, the remaining students begin receiving interventions on that topic.
- The team reports dedicating one hour each week to analyzing data and preparing interventions, and another hour each week for additional collaboration. They also communicate daily with each other.
- This team also sets monthly goals for each of the tested categories on the Acadience Reading assessment. The assessment and progress monitoring data guide their goals.

This first-grade team has demonstrated successful practices that benefit not only students, but also the teachers in second and third grades. The graphs below show that first grade improves on the percentage of students meeting grade level benchmarks at this school.

Cohort 5 (3rd Grade—2024)

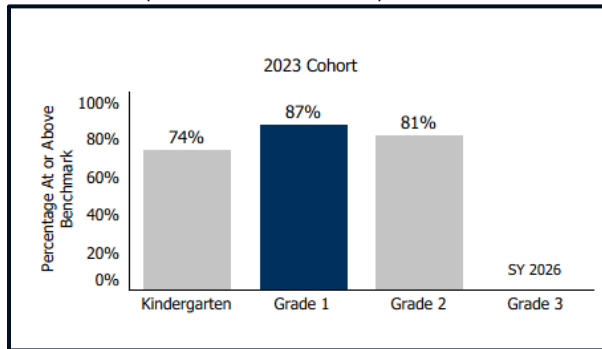


Cohort 6 (3rd Grade—2025)

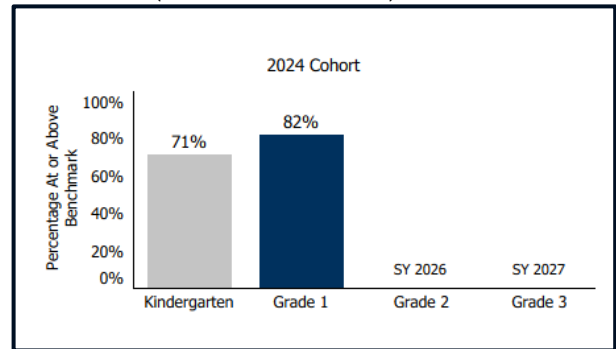




Cohort 7 (3rd Grade—2026)



Cohort 8 (3rd Grade—2027)



Source: Auditor generated based on USBE data.

The goal is for Utah students to be proficient readers by the end of third grade. By addressing lower outcomes in first grade, subsequent teachers can focus interventions on a smaller group of students that are persistently underperforming.

While every school might not have the same achievement gap discussed here, they need to use the data to accurately identify their weak spots and trends. This concept is supported by our *Best Practice Handbook*.

OLAG's Best Practice Handbook:

"Measures gain greater value when contextualized through comparisons. Baselines and benchmarks provide valuable context that managers need to set goals and targets. Without this information, managers must approximate the conditions of the organization and make guesses about what they will be able to achieve" (p.26).

Based on our findings, we believe that intentional planning and implementation are needed to see significant gains in early literacy. We expect all LEAs to use the Acadience Reading data that is already available to identify where they can make improvements. Ultimately, it is the responsibility of each LEA to ensure its schools are engaging with the data and acting on it.

RECOMMENDATION 1.1

Every local education agency should hold its schools accountable for early literacy goal setting and goal achievement. While accountability processes will vary to meet local needs, goal setting and assessing progress should happen at least three times a year following Acadience Reading administrations.



1.2 Examining LEAs and Schools Meeting the New 80% Goal Provides Useful Insight

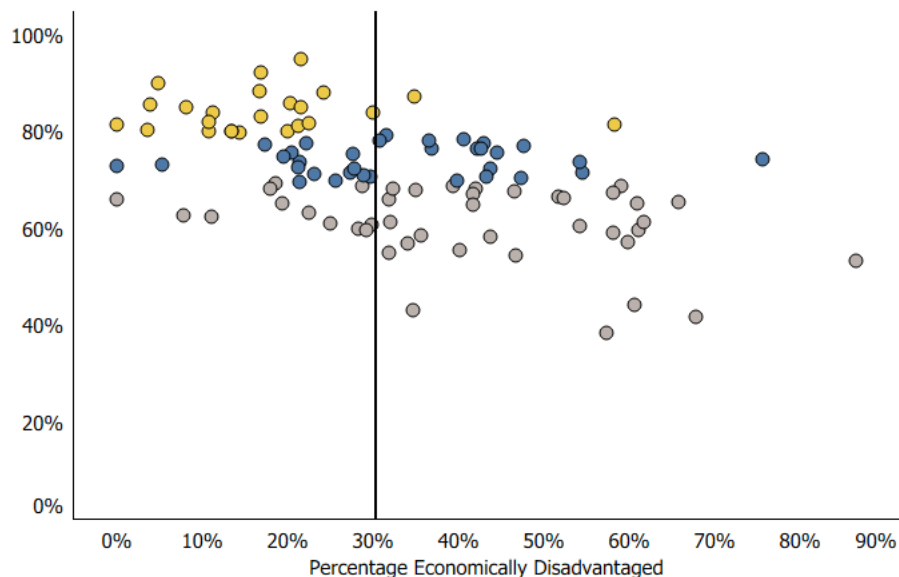
Despite a lack of movement at the state level, several LEAs have 80% percent of their third graders meeting benchmark. Two LEAs that we visited during the audit have met the new 80% goal and demonstrated or reported using best practices in their English Language Arts instruction. These high-performing LEAs demonstrate that certain combinations of curriculum can help many students reach the Acadience Reading benchmark, meeting the intent of early literacy legislation. Based on this evidence, we recommend that USBE approve the specific combination of curriculum used by LEAs that consistently meet the state goal.

Reading Outcomes Should Be a Factor in Approving Curriculum

S.B. 241⁷ increased the goal of third graders meeting the Acadience Reading benchmark to 80% by 2030. Figure 1.3 shows that some LEAs are doing better than others, carrying more of the weight in achieving the statewide goal.

Figure 1.3 As of 2025, 24 LEAs Have Met the Goal of 80% of Third Graders Meeting Benchmark, with Most Having a Smaller Economically Disadvantaged Population.

Dots on the right side of the graph represent LEAs with more students that are economically disadvantaged while dots on the left side represent LEAs with fewer economically disadvantaged students.



Source: Auditor generated based on USBE data.

Note: Yellow dots represent LEAs that have met the new benchmark goal of 80%. Blue dots represent LEAs that have 70% at or above benchmark. Gray dots represent LEAs that are below 70%.

⁷ S.B. 241 was passed during the 2026 General Legislative Session.



We visited two of several high-performing LEAs shown in Figure 1.3: a charter with multiple schools in the Salt Lake Valley and a district in a rural area. Both LEAs fall to the right of the medial line on Figure 1.3, meaning they have a higher percentage of economically disadvantaged students.

A School Within a High-Performing Rural School District Reported

Implementing Several Best Practices. School administrators reported generally consistent use of their adopted phonics program and described its emphasis on explicit instruction as a benefit. They also reported work on vertical alignment of concepts between grade levels. For example, the first-grade team asked the kindergarten team to adjust their focus to better align with the requirements of first grade.

A High-Performing Urban Charter Demonstrated Multiple Best Practices. This charter school demonstrated direct instruction and consistent teaching strategies across classrooms. Despite this LEA having almost 90% of their third-grade students meeting the benchmark, it was reportedly not recognized for their performance because of disagreement over the quality of its curriculum. However, being one of the highest-performing LEAs in the state indicates to us that it meets the intent of S.B. 127 and S.B. 241.



The curriculum requirement is meant to ensure that LEAs are using high-quality programs that will lead to improved instruction and greater student achievement.

The curriculum requirement is meant to ensure that LEAs are using high-quality programs that will lead to improved instruction and greater student achievement. However, USBE's tracking for this requirement only identifies whether they have approved an LEA's curriculum. It fails to determine whether an LEA has literacy curriculum to cover each of the science of reading (SoR) components: phonics, phonological awareness, comprehension, fluency, vocabulary, and writing. For example, one LEA has

three programs listed as their core literacy programs. Across these three programs, phonics and phonological awareness are covered, but none include the other four SoR components. This requirement tied to early literacy legislation needs to ensure LEAs are incorporating all six literacy areas in the SoR and the programs are contributing to improved early literacy outcomes.⁸

⁸ S.B. 241 maintains this requirement but curriculums are approved by the Science of Reading Panel (panel). USBE or the panel needs to ensure oversight is covering what we address in this paragraph.



We recommend that USBE adjust the current structure for curriculum requirements. If an LEA is supporting its school(s) and meeting the needs of students, evidenced by 80% or more of them reaching benchmark, it should be able to exercise more local control and use what works. Conversely, if an LEA continues to perform poorly, it should be expected to use programs that have had success in Utah.⁹

RECOMMENDATION 1.2

Local education agencies should ensure that they are addressing all six science of reading areas through early literacy curriculum(s).

RECOMMENDATION 1.3

The Utah State Board of Education through the Science of Reading panel should approve the specific combination of curriculum as a unit for any local education agency that meets the 80% goal for at least 2 consecutive years.

This recommendation prioritizes the purpose of early literacy legislation, which is supporting LEAs in improving early literacy outcomes. Our *Diagnosing Root Causes Handbook* states that policies and standards should consistently produce outcomes. At this time, it seems the enforcement of the SoR curriculum requirement is based on compliance rather than effectiveness. USBE needs to focus more on the outcomes being produced to determine what is working.

This recommendation also highlights Utah's effort to let LEAs run their schools how they want, to the extent possible. When LEAs and school leaders are successful, they should be trusted to lead. This does not remove accountability; LEAs and schools that are consistently underperforming need central support. For these LEAs and schools, USBE needs to know why the curriculum being implemented is not yielding improved outcomes.

⁹ A researcher at the University of Utah plans to work with USBE to analyze which curriculums are effective.

Science of Reading Investments Should Be Linked to Student Outcomes to Ensure Best Results for Utah Students



BACKGROUND

In 2022, the Legislature clarified additional testing requirements for initial teaching licenses and expanded early literacy training requirements for teachers. Senate Bill (S.B.) 127 required educator preparation programs to prepare teacher licensure candidates for a foundations of reading assessment. It also funded the hiring of science of reading (SoR) faculty at Utah's higher education institutions.

FINDING 2.1

Science of Reading Teacher Training Has Not Been Linked to Increased Student Proficiency

RECOMMENDATION 2.1

The Utah State Board of Education and local education agencies should include, and require vendors to include, a set of standard identifiers in all data sets to enable more complete analysis of programs and initiatives.

RECOMMENDATION 2.2

The Utah State Board of Education, in collaboration with university-based Educator Preparation Programs, should conduct data analysis to measure the impact of science of reading teacher training on K-12 student literacy scores. This analysis could include the Utah Foundations of Reading Assessment and Language Essentials for Teachers of Reading and Spelling and should be used to inform program improvements.

RECOMMENDATION 2.3

The Utah State Board of Education and local education agencies should, in future proposal requests for science of reading training, require potential vendors to guarantee proctored assessments.

RECOMMENDATION 2.4

The Utah State Board of Education leadership should set the tone for statewide focus on student growth and ensure that the measure of success for student literacy programs is their impact on student proficiency.

FINDING 2.2

Science of Reading Personnel Can Be Better Utilized

RECOMMENDATION 2.5

The Utah State Board of Education and Utah System of Higher Education need to work with university-based Educator Preparation Programs to ensure that science of reading faculty have clear role statements that account for their time spent working on statewide literacy initiatives.

RECOMMENDATION 2.6

The Utah State Board of Education should improve its collaboration with the expert panel, the Center for the School of the Future, science of reading faculty, and other key stakeholders outlined in S.B. 241. These collaborations should be focused on improving student proficiency.



CONCLUSION

The Utah State Board of Education and Utah universities have made measurable progress in the percentage of teacher candidates passing the reading foundations assessment. However, the state currently lacks the data infrastructure and role clarity needed to determine whether these SoR investments are improving student outcomes.





Chapter 2

Science of Reading Investments Should Be Linked to Student Outcomes to Ensure Best Results for Utah Students

Legislative changes to literacy instruction and funding over the last four years have largely been implemented. However, the Utah State Board of Education (USBE) has not taken the initiative to link these investments to a measurable difference in K-12 student outcomes. In 2020, the Legislature sought to strengthen statewide implementation of science of reading (SoR)¹⁰ practices by requiring new teacher licensure candidates to pass the Utah Foundations of Reading Assessment (UFORA). The Legislature took further action in 2022, including:

- Creating funding to hire SoR expert faculty at Utah Systems of Higher Education (USHE) institutions
- Organizing an expert panel to provide guidance to USBE
- Requiring collaboration between USBE and the Center for the School of the Future¹¹

Our office reviewed these 2022 requirements, outlined in S.B. 127, to assess whether they are achieving their intended purpose of improving student literacy outcomes. We found that data collected by USBE and its vendors does not have some of the information needed to fully understand the impact of teacher training on student test scores. Additionally, USBE is not currently working to conduct such an analysis either on their own or in collaboration with USHE institutions. USBE should take the initiative to organize these analyses, measure program impacts on student proficiency, and present the results to the Legislature. These analyses should also be used to make changes to programs that are not adequately impacting student proficiency. While USBE should organize these research efforts, it may choose to rely on reputable research partners to conduct the analysis.

¹⁰ Science of reading is a collection of research gathered over time from multiple fields, using multiple study methods, that confirm and disconfirm theories on how children best learn to read. It includes a focus on phonemic awareness, phonics, fluency, vocabulary, and comprehension.

¹¹ The Center for the School of the Future at Utah State University was created by the Legislature in 1999 to promote best practices in the state's public education system and encourage cooperative research development relationships between public and higher education.



2.1 Science of Reading Teacher Training Has Not Been Linked to Increased Student Proficiency

USBE has not established a data infrastructure sufficient to determine whether SoR training requirements are improving student literacy outcomes. Data sets for teacher trainings and student assessments use different identifying information, making it challenging to link teacher scores or certification to student outcomes. Our office conducted an analysis that found no significant relationship between Language Essentials for Teachers of Reading and Spelling (LETRS) or UFORA success and improved K-12 student test scores. Our analysis demonstrated issues within USBE's data processes that make it difficult to determine the effectiveness of LETRS and UFORA.

LETRS Training Exams Need Increased Controls to Ensure Literacy Understanding Is Improving

USBE provides SoR training to give teachers an understanding of fundamental reading instruction. The LETRS training, specifically, consists of eight units, which include unit tests and summative assessments. Over 10,000 teachers have enrolled in the training since it became available. However, the flexibility of the program may allow teachers to complete the training without adequately improving their literacy understanding. While teachers are required to work through the materials in order, the instruction is largely video based and requires limited interaction. Furthermore, each of the tests and assessments is open book and not proctored. Our office found an online source that provides answers to the program's test questions.

The lack of testing oversight and the potential to quickly move through materials may have allowed some individuals to complete the training without improving



The lack of oversight on LETRS tests may have allowed some individuals to complete the training without improving their understanding of reading instruction.

their understanding of reading instruction.

Additionally, LETRS assessments have no passing score, meaning that anyone who completes the training becomes LETRS certified.

One USBE staff reported that they asked the LETRS vendor to make the tests throughout the training more secure and prevent teachers from accessing answers online while taking the assessments.

However, this request was not documented, and no changes were made. USBE should ensure that future

contracts require program oversight and that tests accurately measure teachers' knowledge. In addition to making testing more secure, USBE should establish a



passing score for SoR training to verify whether teachers who become certified have a robust understanding of the fundamentals of reading instruction.

Educator Preparation Programs Are Meeting or Exceeding Required Pass Rates

In 2020, the Legislature introduced a required literacy preparation assessment for individuals seeking a professional teaching license in early childhood, elementary, and special education.¹² S.B. 127 in 2022 required Education Preparation Programs (EPPs) to help pre-service teachers prepare for assessments. USBE also established a minimum UFORA passing score of 240 in



As of 2025, all EPPs with 10 or more UFORA test takers met or exceeded the required passing threshold.

2024.¹³ University-based EPPs and Alternate Pathway to Professional Educator License (APPEL) programs are required to maintain a 75% passing rate.¹⁴

Programs that do not meet the pass rate threshold are placed in a state support program. Teachers who were already licensed prior to UFORA implementation received access to SoR training

through LETRS. Appendix C of this report provides LETRS completion rates by district and UFORA pass rates by EPP.

As of 2025, all EPPs with 10 or more test takers met or exceeded the required 75% passing threshold. Data from the past three years shows consistent year-over-year improvement across all programs.

University leaders and SoR faculty attributed these gains to several targeted strategies, including the following:

- Incorporating UFORA vocabulary and practice questions into core curriculum
- Expanding access to study materials and preparation resources
- Providing tutoring for pre-service teachers

¹² House Bill 114 (2020) and *Utah Code* 53E-6-301.

¹³ Individuals who score between 231 and 239 are eligible to complete the Utah FLEX Foundations of Reading Series. FLEX candidates must provide a written submission to demonstrate their subject matter knowledge to meet the UFORA requirement for licensure.

¹⁴ APPEL programs were created in 2020 to prepare individuals to meet professional teaching license requirements. Candidates generally have a bachelor's degree and are employed in a school that has a partnership with an approved APPEL program. These programs may be administered by local school districts, charter schools, private schools, consortiums, or USBE.



- Increasing required literacy coursework and strengthening practicum processes

While these improvements are encouraging, multiple SoR faculty raised concerns that there is currently no mechanism to track the impact of these efforts after a teacher becomes licensed and enters the classroom. Our office shares this concern. Until the state has a mechanism for connecting UFORA scores to outcomes for students, we will not know if these efforts have an impact on student literacy.

Audit Analysis Could Not Link Training to Higher Proficiency on Student Assessment

S.B. 127 aimed to provide comprehensive support for schools and LEAs in improving early literacy. This support includes teacher training in SoR. The bill requires USBE to report to the Legislature on the training programs' outcomes. USBE's reports to the Education Interim Committee were centered around survey results from teachers. The survey questions focused on teachers' personal opinions about the training's value and not its impact on students.

While teacher feedback on training is important, our office worked to determine if completing a LETRS certification or passing UFORA is associated with an increased percentage of K-12 students meeting benchmark.¹⁵

Our analysis found no link between passing these assessments or training programs and improved student benchmark scores. This does not mean that teachers have not helped students improve, only that we did not see a statistically significant increase in proficiency levels due to teachers' successful completion of SoR assessments and training.

The following infographic demonstrates that students reached grade-level benchmarks at similar rates regardless of their teacher's training status. After accounting for student background, including prior student performance, we found that teachers' successfully completed training does not meaningfully change student outcomes, on average. More



Several university leaders and faculty raised concerns that there is currently no mechanism to track the impact of teacher training efforts after a teacher becomes licensed and enters the classroom.



The absence of common identifying data—paired with limited statewide analysis of training impacts—means that we do not fully know whether UFORA and LETRS are having a measurable impact on student literacy.

¹⁵ The analysis controlled for relevant school, class, and student demographics, including special education, low income, homeless, average number of absences, gender, race, ethnicity, English language learners, whether student is at or above benchmark at the beginning of the year, and more. See Appendix E for a full list of student demographic controls.

information about this analysis and the methodology used can be found in Appendix E.



Source: Auditor generated using best available data.

This analysis also identified concerns with data collection in both K-12 and teacher trainings. Different identifying data is collected for UFORA, LETRS, and CACTUS (Comprehensive Administration of Credentials for Teachers in Utah Schools Records). For example, common identifiers such as legal name and birthdate were not collected in the data sets. This lack of common identifiers makes it difficult to reliably link an individual teacher's training or assessment information to their students' scores. As a result, our analysis used the best available data but could not fully account for this limitation.

USBE needs to address these data gaps to determine what changes are needed in teacher training. The absence of common identifying data to link teacher training to classroom outcomes—paired with limited statewide analysis of training impacts—means we do not fully know whether UFORA and LETRS are having a measurable impact on student literacy. Without this information, EPPs cannot improve their practices to better prepare teachers, and USBE cannot evaluate training requirements, target resources effectively, or demonstrate a return on the state's investment.

Multiple SoR faculty expressed awareness of the data gap and the need to determine training effectiveness. These faculty expressed a desire to improve program analysis and use findings to improve teacher training. This effort to understand the impact of SoR teacher training will require USBE to work with universities and improve their communication and coordination. Improved collaboration between USBE and universities will allow for analysis on a larger scale. At least one SoR faculty member is already preparing to conduct an analysis using student assessment data and is well positioned to assist with this analysis. USBE should build on this foundation by establishing a coordinated research effort to analyze the impacts of UFORA and LETRS training. While USBE is the primary owner of student and teacher data, they should work with USHE to access data from university-based EPPs.



Making improvements in data gathering and implementing changes to teacher training both require guidance and support from USBE leadership. To maximize student proficiency outcomes, leadership should carefully plan and oversee



USBE should establish a coordinated research effort to analyze the impacts of UFORA and LETRS training.

analysis of program impacts on students. Well-designed analysis and intervention can provide information on what does and does not work. We recommend that USBE work with universities to thoroughly analyze the impact of these trainings and assessments on student achievement. We also recommend that USBE create a list of identifiers and require them in all future data sets, including those

created by contractors, to ensure that robust analysis can be conducted.

Furthermore, USBE leadership should set the tone for statewide focus on student growth and ensure that the measure of success for literacy programs is their impact on student proficiency.

RECOMMENDATION 2.1

The Utah State Board of Education and local education agencies should include, and require vendors to include, a set of standard identifiers in all data sets to enable more complete analysis of programs and initiatives. (Structure)

RECOMMENDATION 2.2

The Utah State Board of Education, in collaboration with university-based Educator Preparation Programs, should conduct data analysis to measure the impact of science of reading teacher training on K-12 student literacy scores. This analysis should include the Utah Foundations of Reading Assessment and Language Essentials for Teachers of Reading and Spelling and should be used to inform program improvements. (Process)

RECOMMENDATION 2.3

The Utah State Board of Education and local education agencies should, in future proposal requests for science of reading training, require potential vendors to guarantee proctored assessments. (Structure)



RECOMMENDATION 2.4

The Utah State Board of Education leadership should set the tone for statewide focus on student growth and ensure that the measure of success for student literacy programs is their impact on student proficiency. (Leadership)

2.2 Science of Reading Personnel Can Be Better Utilized

SoR personnel include faculty at USHE institutions, the Center for the School of the Future, and an expert panel created by the Legislature.¹⁶ S.B. 127 funded SoR faculty positions at USHE universities and created an expert reading panel to advise USBE. All eligible institutions hired an SoR faculty member, and the expert panel was created. However, neither SoR faculty nor panel members have clearly defined roles or responsibilities, which may limit the value the state receives from these positions.

S.B. 127 created three primary ways for SoR experts to advise and collaborate with USBE:

- A requirement for USBE to consult with the Center for the School of The Future in developing a best practices repository
- Dedicated funding for USHE universities to hire SoR expert faculty¹⁷
- An SoR expert panel to advise USBE on policy and implementation

While USBE met the minimum requirements for working with the organizations included in S.B. 127, the knowledge and expertise of these groups can be more fully utilized to improve student outcomes. Previous USBE leadership was reportedly reluctant to work with some of these groups and did not adequately communicate with USHE universities to ensure that expectations for SoR faculty were clear. Therefore, we recommend that USBE improve its relationship with these literacy experts and more fully utilize their insights to promote statewide literacy growth.

We recognize that leadership changes at USBE may impact the organization's approach to literacy program implementation. Effective leaders can positively

¹⁶ USBE is currently selecting new panel members. This new panel will become effective July 2026.

¹⁷ All eligible USHE institutions hired an SoR faculty member following the bill's implementation. One SoR faculty member hired with this funding left their institution in February 2026.



shift the culture of the organization and use their position to petition for necessary changes. We recommend that USBE's new leaders build productive relationships with SoR experts, ensure all bill implementation efforts are focused on student outcomes, and address the impact of these programs on student proficiency when reporting to the Legislature.

Science of Reading Faculty Need Clear Roles and Increased Supports

SoR faculty members have helped universities improve their UFORA preparation processes and literacy instruction, as outlined above. However, our interviews with multiple faculty members across institutions revealed that they have not been provided with clearly defined roles and responsibilities. Additionally, some faculty reported that their universities did not understand their role in collaborating with USBE on statewide SoR initiatives. These faculty are uniquely positioned as literacy experts who can assist USBE in data collection and analysis while they help prepare future generations of teachers.

The lack of clear role statements is particularly concerning for SoR faculty in tenure track positions. These faculty have comprehensive role statements that



SoR faculty may be overutilized by their universities and underutilized by USBE as literacy experts because they lack clear role statements.

outline how they are expected to split their time between teaching, research, and service. When they are assigned SoR faculty roles without clearly defined responsibilities, they may struggle to allocate their time. They may be overutilized by their university or underutilized by USBE as literacy experts. SoR faculty are expected to meet regularly with USBE and contribute to statewide initiatives, but that expectation may not be reflected in their role

statement and may compete with their research and service obligations. These faculty often manage UFORA preparation for their universities and collaborate with USBE to ensure that pre-service teachers are meeting the required core competencies. SoR faculty may also work with USBE on important research and data analysis to identify areas where the state can improve.

Without clearly defined external responsibilities, universities may also struggle to understand what support faculty need. While some SoR faculty had good alignment and support within their college, others did not. It appears that USBE's expectations for SoR faculty were not adequately communicated to university leaders or changed over the course of the academic year. Additionally, university leaders may not have fully considered SoR responsibilities when determining staff's roles and levels of support. Guidance from USBE to USHE



and university leadership regarding the expectations for SoR faculty will help to address this issue.

The Expert Panel Has Been Underutilized and Lacks Clear Responsibilities

S.B. 127 created an SoR expert panel to advise USBE on literacy policy and implementation. Panel members are recognized as experts in their fields. These individuals are volunteering their time because they want to see Utah successfully improve elementary student literacy scores. If USBE hired consultants with comparable expertise, the cost would likely be significant. This panel represents a substantial resource that USBE may be underutilizing.



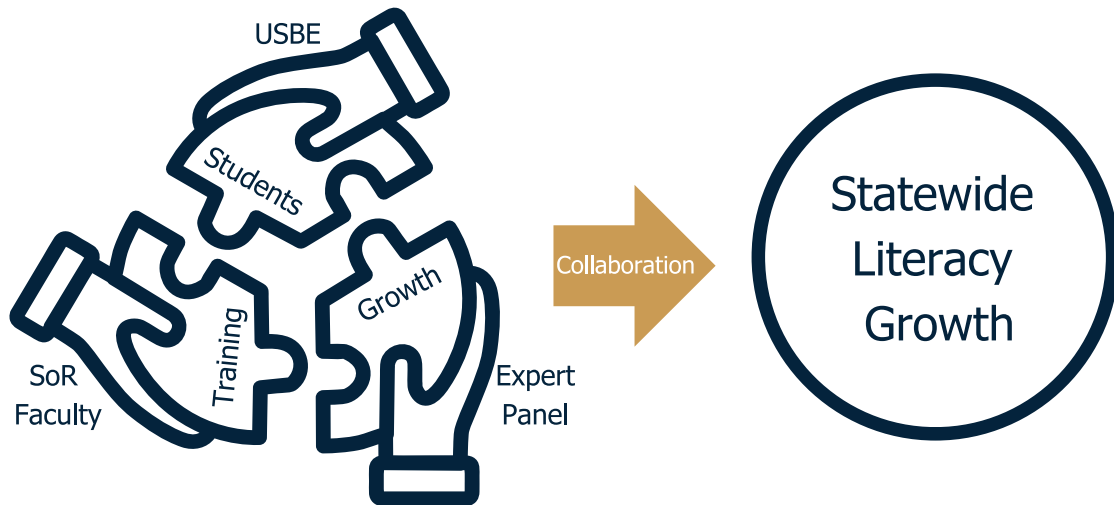
Members of the expert panel reported that USBE met the minimum requirements for the panel's role, but panel members wanted to be more involved.

Panel members reported that USBE met the minimum requirements in regard to the expert panel's role, but the panel expressed a desire to be more involved.¹⁸ Members expressed frustration that they were not given opportunities to contribute meaningfully to USBE's plans to improve literacy statewide.¹⁹ For example, panel members reportedly asked to help USBE with its implementation of literacy coaching but were not given a chance to do so. However, panel members did report that the relationship with USBE has somewhat improved following recent leadership changes at the agency. This is an encouraging development and suggests that the foundation for a more productive working relationship is in place. The panel's potential to inform policy, review implementation strategies, and provide expert guidance could help with the state's efforts to improve early literacy and should be more fully utilized.

Both the expert panel and SoR faculty can provide USBE with significant knowledge and counsel as they seek to improve student literacy outcomes statewide. While some SoR experts reported that panel members may have different approaches to literacy instruction, the panel should still be recognized as a resource for the state.

¹⁸ The minimum requirements for the panel were established in S.B. 127 from the 2022 General Legislative Session. These requirements include meeting at least quarterly, serving in a consulting capacity for the state board, and taking part in the hiring of SoR faculty.

¹⁹ Several expert panel members are also employed at the Center for the School of the Future and reported that USBE did not adequately collaborate on a project outlined in S.B. 127. USBE was able to provide context and documentation for this instance. However, USBE and the Center for the School of the Future should work together to improve their relationship and focus on their shared role of improving student literacy outcomes.



Source: Auditor generated.

Despite differences in roles and perspectives, USBE, the expert panel, and SoR faculty represent valuable resources to help Utah achieve statewide literacy growth. However, their current relationship has not produced the level of collaboration needed to promote this statewide growth. We recommend that USBE and members of the expert panel work to improve their relationship and consult together regularly on how Utah can improve student literacy outcomes. While USBE is the public education oversight body, it should seek insights and input from the expert panel, SoR faculty, and other key stakeholders outlined in S.B. 241²⁰ as they work to create a statewide system for literacy growth. USBE should ensure that all SoR personnel are working together to improve student proficiency outcomes.²¹

RECOMMENDATION 2.5

The Utah State Board of Education and Utah System of Higher Education need to work with university-based Educator Preparation Programs to ensure that science of reading faculty have clear role statements that account for their time spent working on statewide literacy initiatives.

²⁰ S.B. 241 was passed in 2026 while this audit was ongoing. This bill made changes to the code provisions implemented through S.B. 127.

²¹ Utah Leading through Effective, Actionable, and Dynamic (ULEAD) Education has published multiple reports that cover science of reading and effective reading practices. These reports are publicly available and could be used in the collaboration between the stakeholders included in S.B. 241. ULEAD reports can be found at <https://schools.utah.gov/ulead/repository/reports>.



RECOMMENDATION 2.6

The Utah State Board of Education should improve its collaboration with the expert panel, the Center for the School of the Future, science of reading faculty, and other key stakeholders outlined in S.B. 241. These collaborations should be focused on improving student proficiency.





BACKGROUND

Almost 50 schools have received an instructional coach with funding from S.B. 127. These schools were all considered to be low-achieving schools. Some schools have had their coach removed due to improvement in student achievement. However, some have had their coach removed for other reasons

FINDING 3.1

Results are Mixed for Schools with S.B. 127 Literacy Coaches

RECOMMENDATION 3.1

LEAs should establish clear evidence-based metrics for determining the effectiveness of a school leader and then provide adequate support and accountability in meeting those metrics.



CONCLUSION

Where school administrators of low-achieving school have been involved in literacy professional development, greater improvement in the percentage of students meeting the Acadience Reading Benchmark can occur. An effective school leader can positively impact a school, and it is the responsibility of each local education agency to ensure schools are staffed with effective administrators.





Chapter 3

Accountability and Outcome Measures Are Needed to Help Improve Student Literacy Achievement

3.1 Results Are Mixed for Schools with S.B. 127 Literacy Coaches

Under the early literacy legislation enacted during the 2022 General Legislative Session, instructional coaches were assigned to support low-achieving schools. Following implementation, literacy outcomes across schools receiving coaching support have been uneven, with gains in some schools but not others. We found that schools that chose to remove their coaches improved less than those that kept their coaches until they had significant improvement.

There is also evidence that the involvement of the school administrator in literacy-based professional development can impact that school's improvement. Therefore, there needs to be more support and accountability of school administrators concerning their effectiveness and their school's. We use both our *Best Practice Handbook for Student Achievement in Public Education* and our *Best Practice Handbook* to highlight best practices for local education agencies (LEAs).

Low-Performing Schools that Received Coaches Are Having Mixed Results

Among schools that received legislatively funded coaches, reading improvement rates have varied. We found that schools that gave up their coach were performing lower initially and have not seen the same magnitude of improvement as schools that kept their coach until USBE staff determined they had sufficient achievement improvement.

Senate Bill (S.B.) 127 requires the Utah State Board of Education (USBE) to provide and train literacy coaches for schools that are low achieving in literacy. The coaches' responsibilities include the following:

- Assisting educators with data analysis for instructional purposes
- Ensuring coaching cycles exist to build instructional capacity of educators
- Helping educators use science of reading and other evidence-based practices to maximize student learning
- Partnering with the school's leader to achieve schoolwide literacy goals and support teachers in student learning



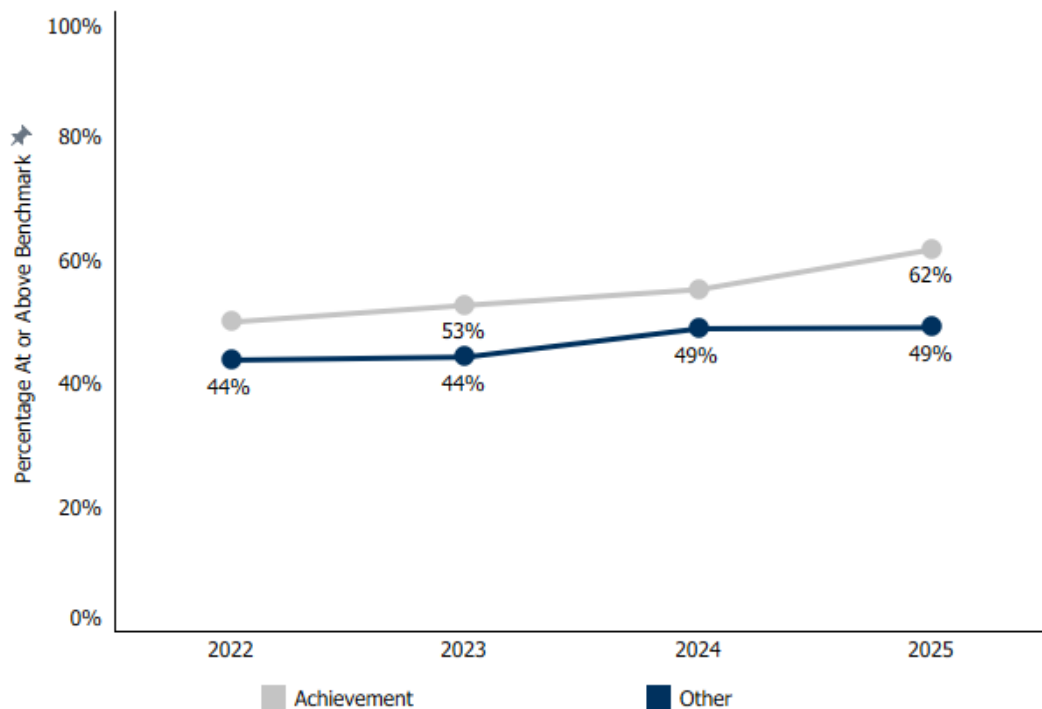
USBE employs some instructional coaches who work in low-achieving schools. However, most of the S.B. 127 literacy coaches are employed by a school's LEA.



Instructional coaches should partner with the school's leader to achieve schoolwide literacy goals and support teachers in student learning.

Since the 2023 school year, 48 schools have received a coach through early literacy legislation funding. Of those schools, four had their coaches removed due to improvement in student achievement. Thirteen other schools had their coaches removed for other reasons, such as closing the school, starting a schoolwide specialty program like foreign language immersion, or the coach being removed for unspecified reasons. Figure 3.1 shows a comparison between the schools that no longer have instructional coaches provided through this funding.

Figure 3.1 Schools Whose Coaches Were Removed for a Reason Other than Achievement Have Not Had the Same Literacy Improvement. Schools that had coaches removed without significant improvement continue to perform lower. Reasons why a school no longer had a coach despite low achievement included when the school switched to a specialty program or the coach being removed for an unspecified reason.



Source: Auditor generated based on USBE data.

Note: Schools that were closed prior to 2025 were not included in this visualization. After we accounted for school closures, three schools were included in the "Achievement" category, and nine were in the "Other" category.



Figure 3.1 shows that schools who removed their S.B. 127 coach for a reason other than achievement started out and ended with fewer students proficient, on average. The most recent year of data showed a 13% average percentage point difference between these two groups.

Through the 2026 school year, USBE placed coaches in schools and provided oversight. Legislation passed during the 2026 General Legislative Session removes coach funding from USBE and places it directly with LEAs. While we recommend that USBE only remove coaches because of significant improvement in achievement, we acknowledge the decision now rests with the LEAs.

School Administrators Can Impact School Performance

In our *Best Practice Handbook for Student Achievement in Public Education*,²² we discuss the significant impact of school administrators on their students. For example, one report we cite states that when a principal in the 25th percentile of effectiveness is replaced by one in the 75th percentile, the impact is equal to almost three additional months of learning.²³ The same report also makes the following assertions:

“...Principals’ effects on students come largely through their effects on teachers, including how principals hire, retain, develop, and encourage teachers and create appropriate conditions for teaching and learning.”



“...A student learns more in a school with an effective principal in part because the principal makes it more likely the student gets that [effective teaching] exposure.”

²² *The Best Practice Handbook for Student Achievement in Public Education* (2025–13).
https://pf.utleg.gov/olag/reports/audits/2025/2e08c05d-2bf6-40e8-b46c-5ab79dbcf0ed/2025-13_RPT.pdf.

²³ This conclusion is based on the Wallace Foundation report titled “How Principals Affect Students and Schools,” by Jason A. Grissom, Anna J. Egalite, and Constance A. Lindsay. (2021).
<https://doi.org/10.59656/EL-SB1065.001>.



An effective school leader is an important part of an effective school. A book titled *10 Traits of Highly Effective Schools*²⁴ highlights this point. It states several important functions effective school leaders must carry out:

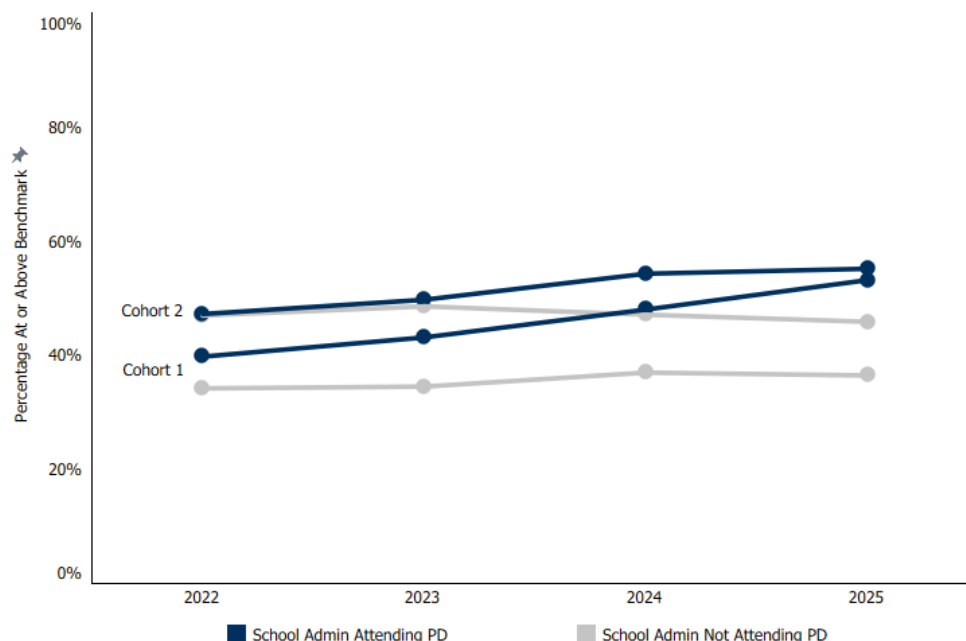
- Lead in both teaching and learning
- Set, implement, and achieve academic goals
- Create and facilitate a culture that allows for student learning
- Communicate the school's vision and mission by their actions
- Set high expectations for themselves and their staff
- Develop teacher leadership in their school
- Demonstrate a positive attitude

An effective school administrator that prioritizes literacy can impact the success of their school. Figure 3.2 shows the difference between schools with S.B. 127 coaches whose administrators have participated in the current USBE-provided professional development and those who have not.

²⁴ McEwan, Elaine K. (2009). *Strong Instructional Leadership. 10 Traits of Highly Effective Schools*, 11-34. Corwin Press: California.



Figure 3.2 Schools with Administrators Who Participate in Professional Development Perform Better, on Average, on Reading Assessments than Those Whose Administrators Do Not Participate. For both cohorts, the school average for principals that attended professional development exceeded the school average for principals that did not attend.²⁵



Source: Auditor generated based on USBE data.

Note: Cohort 1 includes schools that first received an S.B 127 coach for the 2022-2023 school year.

Cohort 2 includes schools that first received one for the 2023-2024 school year.

Figure 3.2 demonstrates differing achievement levels based on a school administrator's degree of involvement in improving literacy. The results shown in this figure align with research available on effective school leaders, some of which is covered in this chapter and demonstrates the positive impact a school leader can have on student achievement.

Our *Best Practice Handbook for Student Achievement in Public Education* states that effective principals allow teachers to focus on student learning and achievement. In the handbook, we outline four traits that characterize effectiveness, which are similar to those listed on the previous page:

- Visionary school planners

²⁵ Administrator participation in state professional development was associated with significant improvements in benchmark rates. Across cohorts, schools whose administrators participated saw significant gains on Acadience Reading ($p < .1$), while schools without participating administrators did not.



- Instructional leaders
- Champions of teacher collaboration
- Experts in tiered interventions

The roles of school and LEA administrators can also fit into the management level of an organization as explained in our *Best Practice Handbook*. The handbook explains the need to balance the responsibilities of an organization's board, its management, and its internal audit.



Source: OLAG Best Practice Handbook, adapted from the Institute of Internal Auditors

Management is responsible for implementing the priorities of the organization's board. This includes meeting its goals, such as 80% of third graders meeting the reading benchmark. The board must then hold management accountable for fulfilling its responsibilities. If a school is not on track to meet this goal, then the LEA's board must expect management to address the gap in performance or they must take appropriate action.



Auditors can also play a significant role in literacy achievement. With the responsibility of ensuring effectiveness, they should make sure the other two parties, as seen in the above figure, are using data to inform decisions.

An LEA's internal audit function can also play a significant role in literacy achievement. With the responsibility of ensuring effectiveness, auditors should make sure the other two parties, as seen in the above figure, are using data to inform decisions. Without this type of informed decision-making, LEAs and schools are at risk of misappropriating resources to something that is not necessarily the cause of low achievement. We recommend that each LEA establishes clear evidence-based metrics for determining the effectiveness of a school leader. It is then the LEA's responsibility to support its school

administrators in developing and implementing the skills of effective school leaders and holding them accountable.²⁶

RECOMMENDATION 3.1

Local education agencies should establish clear evidence-based metrics for determining the effectiveness of a school leader and then provide adequate support and accountability in meeting those metrics.

²⁶ A sample of LEAs will be used in determining implementation during the audit follow-up process.

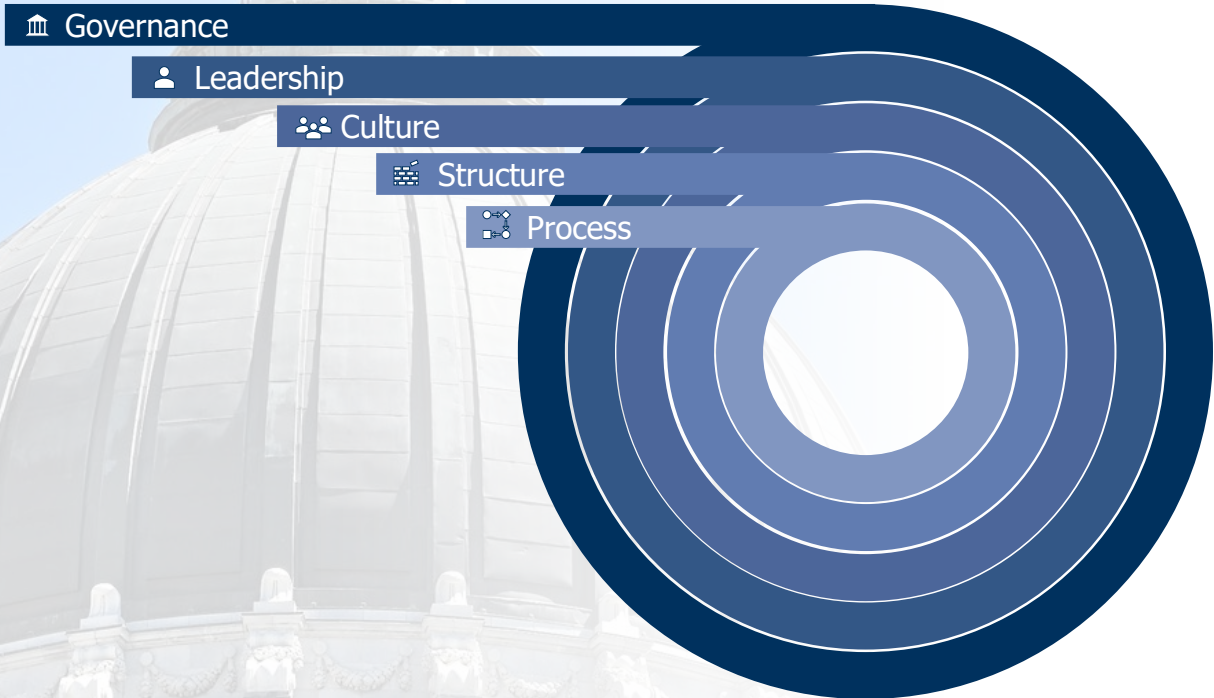




Complete List of Audit Recommendations

THE FIVE LAYERS OF CAUSE

We developed the Five Layers of Cause Framework to assist leaders in identifying the causes of organizational success and failure. To truly improve as an organization, leaders must understand the causes of major risks. Only when leaders understand these causes and their roots can they make meaningful improvements. Root causes are deeper and more fundamental.

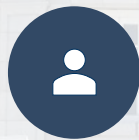


The five layers of cause are defined below. They are ranked from most impactful in organizational change to least. The next page identifies the layer of cause in each recommendation.



GOVERNANCE

The laws and rules that establish the organization's mission, accountability, and funding. Governance empowers the organization with the leadership and resources needed to achieve meaningful results.



LEADERSHIP

The competency and character of the leaders of the organization. Leadership is the decisive force that transforms vision into action and effort into results.



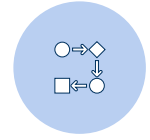
CULTURE

The collective beliefs, values, and behaviors of the organization. An organization's culture can determine employee engagement and morale, willingness to innovate, and quality of product.



STRUCTURE

The policies and standards that guide an organization's work. Structures direct the flow of work and establish what is and is not acceptable.



PROCESS

The steps taken to accomplish a task. Processes are the logistics—the capital, workflows, timing, and practices—that move work along.



Complete List of Audit Recommendations

This report made the following ten recommendations. The numbering convention assigned to each recommendation consists of its chapter followed by a period and recommendation number within that chapter.

Recommendation 1.1 (Governance)

Every local education agency should hold its schools accountable for early literacy goal setting and goal achievement. While accountability processes will vary to meet local needs, goal setting and assessing progress should happen at least three times a year following Acadience Reading administrations.

Recommendation 1.2 (Structure)

Local education agencies should ensure that they are addressing all six science of reading areas through early literacy curriculum(s).

Recommendation 1.3 (Process)

The Utah State Board of Education, through the Science of Reading Panel, should approve the specific combination of curriculum as a unit for any local education agency that meets the 80% goal for at least 2 consecutive years.

Recommendation 2.1 (Structure)

The Utah State Board of Education and local education agencies should include and require vendors to include a set of standard identifiers in all data sets to enable more complete analysis of programs and initiatives.

Recommendation 2.2 (Process)

The Utah State Board of Education, in collaboration with university-based Education Preparation programs, should conduct data analysis to measure the impact of science of reading teacher training on K-12 student literacy scores. This analysis could include the Utah Foundations of Reading Assessment and Language Essentials for Teachers of Reading and Spelling and should be used to inform program improvement.

Recommendation 2.3 (Structure)

The Utah State Board of Education and local education agencies should, in future proposal requests for science of reading training, require potential vendors to guarantee proctored assessments.

Recommendation 2.4 (Leadership)

The Utah State Board of Education leadership should set the tone for statewide focus on student growth and ensure that the measure of success for student literacy programs is their impact on student proficiency.

Recommendation 2.5 (Structure)

The Utah State Board of Education and Utah System of Higher Education need to work with university-based Educator Preparation Programs to ensure that science of reading faculty have clear role statements that account for their time spent working on statewide literacy initiatives.

Recommendation 2.6 (Leadership)

The Utah State Board of Education should improve its collaboration with the expert panel, the Center for the School of the Future, science of reading faculty, and other key stakeholders outlined in S.B. 241. These collaborations should be focused on improving student proficiency.

Recommendation 3.1 (Structure)

Local education agencies should establish clear evidence-based metrics for determining the effectiveness of a school leader and then provide adequate support and accountability in meeting those metrics.



Appendices



**A. Percentage of Students At or
Above Benchmark on Acadience
Reading by LEA**



All Local Education Agencies

Institution Name	2025 Percent At or Above Benchmark on Acadience Reading
Odyssey Charter School	>= 95%
Jefferson Academy	92%
Mountainville Academy	90%
Park City District	88%
Thomas Edison	88%
American Preparatory Academy	87%
Summit Academy	86%
Canyon Rim Academy	86%
Morgan District	85%
Beehive Science & Technology Academy	85%
North Star Academy	84%
Edith Bowen Laboratory School	84%
Channing Hall	83%
Early Light Academy at Daybreak	82%
Legacy Preparatory Academy	82%
Highmark Charter School	82%
Beaver District	81%
Lincoln Academy	81%
Canyon Grove Academy	80%
Lakeview Academy	80%
George Washington Academy	80%
Ranches Academy	80%
Renaissance Academy	80%
Quest Academy	80%
Cache District	79%
Monticello Academy	79%
Box Elder District	78%
Vista School	78%
Mountain West Montessori Academy	78%
Kane District	78%
Voyage Academy	77%
South Sanpete District	77%
American Leadership Academy	77%
Garfield District	77%
Washington District	76%
Provo District	76%
South Summit District	76%

Institution Name	2025 Percent At or Above Benchmark on Acadience Reading
North Summit District	75%
Davis District	75%
Gateway Preparatory Academy	74%
Venture Academy	74%
Logan City District	74%
Timpanogos Academy	73%
Navigator Pointe Academy	73%
Alpine District	73%
Uintah District	72%
Canyons District	72%
Sevier District	72%
Hawthorn Academy	72%
Jordan District	71%
Nebo District	71%
Wasatch District	71%
Iron District	71%
Millard District	70%
Wasatch Peak Academy	70%
Leadership Learning Academy	70%
Reagan Academy	70%
Franklin Discovery Academy	69%
North Sanpete District	69%
Weber District	69%
Murray District	69%
Excelsior Academy	68%
Freedom Preparatory Academy	68%
Noah Webster Academy	68%
Juab District	68%
Carbon District	68%
Dual Immersion Academy	67%
Good Foundations Academy	67%
Salt Lake District	67%
Emery District	66%
Ignite Entrepreneurship Academy	66%
Terra Academy	66%
Wallace Stegner Academy	65%
Syracuse Arts Academy	65%
Entheos Academy	65%

Institution Name	2025 Percent At or Above Benchmark on Acadience Reading
Duchesne District	65%
John Hancock Charter School	63%
Mountain Sunrise Academy	63%
Wasatch Waldorf Charter School	63%
San Juan District	61%
Tooele District	61%
Providence Hall	61%
Davinci Academy	61%
Granite District	61%
Treeside Charter School	60%
Ascent Academies of Utah	60%
Valley Academy	60%
Grand District	59%
North Davis Preparatory Academy	59%
Promontory School of Expeditionary Learning	58%
Ogden City District	57%
Advantage Arts Academy	57%
Bridge Elementary School	56%
Spectrum Academy	55%
Esperanza School	55%
Guadalupe School	53%
Utah Virtual Academy	44%
Scholar Academy	43%
Ogden Preparatory Academy	42%
Athlos Academy of Utah	38%

Source: Auditor generated based on USBE data.

Note: Local education agencies (LEAs) with fewer than 40 students in third grade were excluded from these tables. Masking rules used by the Utah State Board of Education²⁷ were applied to the LEAs included in this appendix.

²⁷ USBE Masking Rules: In compliance with FERPA regulations and the USBE policy for protecting students' personally identifiable information, data for groups with fewer than ten students is reported as "n<10." For groups with fewer than forty students, counts are not shown and percentages are obscured by providing the range within which the percentage falls (e.g., 43% would display as 40-49%). Percentages that are close to 100% or 0% are also not reported. This is indicated by a ≤ or > (e.g., ≥95%).

School Districts

Institution Name	2025 Percent At or Above Benchmark on Acadience Reading
Park City District	88%
Morgan District	85%
Beaver District	81%
Cache District	79%
Box Elder District	78%
Kane District	78%
South Sanpete District	77%
Garfield District	77%
Washington District	76%
Provo District	76%
South Summit District	76%
North Summit District	75%
Davis District	75%
Logan City District	74%
Alpine District	73%
Uintah District	72%
Canyons District	72%
Sevier District	72%
Jordan District	71%
Nebo District	71%
Wasatch District	71%
Iron District	71%
Millard District	70%
North Sanpete District	69%
Weber District	69%
Murray District	69%
Juab District	68%
Carbon District	68%
Salt Lake District	67%
Emery District	66%
Duchesne District	65%
San Juan District	61%
Tooele District	61%
Granite District	61%
Grand District	59%
Ogden City District	57%

Source: Auditor generated based on USBE data.

Charters

Institution Name	2025 Percent At or Above Benchmark on Acadience Reading
Odyssey Charter School	>= 95%
Jefferson Academy	92%
Mountainville Academy	90%
Thomas Edison	88%
American Preparatory Academy	87%
Summit Academy	86%
Canyon Rim Academy	86%
Beehive Science & Technology Academy	85%
North Star Academy	84%
Edith Bowen Laboratory School	84%
Channing Hall	83%
Early Light Academy at Daybreak	82%
Legacy Preparatory Academy	82%
Highmark Charter School	82%
Lincoln Academy	81%
Canyon Grove Academy	80%
Lakeview Academy	80%
George Washington Academy	80%
Ranches Academy	80%
Renaissance Academy	80%
Quest Academy	80%
Monticello Academy	79%
Vista School	78%
Mountain West Montessori Academy	78%
Voyage Academy	77%
American Leadership Academy	77%
Gateway Preparatory Academy	74%
Venture Academy	74%
Timpanogos Academy	73%
Navigator Pointe Academy	73%
Hawthorn Academy	72%
Wasatch Peak Academy	70%
Leadership Learning Academy	70%
Reagan Academy	70%
Franklin Discovery Academy	69%
Excelsior Academy	68%
Freedom Preparatory Academy	68%

Institution Name	2025 Percent At or Above Benchmark on Acadience Reading
Noah Webster Academy	68%
Dual Immersion Academy	67%
Good Foundations Academy	67%
Ignite Entrepreneurship Academy	66%
Terra Academy	66%
Wallace Stegner Academy	65%
Syracuse Arts Academy	65%
Entheos Academy	65%
John Hancock Charter School	63%
Mountain Sunrise Academy	63%
Wasatch Waldorf Charter School	63%
Providence Hall	61%
Davinci Academy	61%
Treeside Charter School	60%
Ascent Academies of Utah	60%
Valley Academy	60%
North Davis Preparatory Academy	59%
Promontory School of Expeditionary Learning	58%
Advantage Arts Academy	57%
Bridge Elementary School	56%
Spectrum Academy	55%
Esperanza School	55%
Guadalupe School	53%
Utah Virtual Academy	44%
Scholar Academy	43%
Ogden Preparatory Academy	42%
Athlos Academy of Utah	38%

**B. Percentage of Students At or
Above Benchmark on Acadience
Reading by School**



LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Advantage Arts Academy	Advantage Arts Academy	57%
Alpine District	Foothill School	88%
Alpine District	Traverse Mountain School	88%
Alpine District	Fox Hollow School	87%
Alpine District	Westfield School	85%
Alpine District	Highland School	85%
Alpine District	Ridgeline School	83%
Alpine District	Liberty Hills Elementary	82%
Alpine District	Deerfield School	82%
Alpine District	Cedar Ridge School	81%
Alpine District	Springside School	80%
Alpine District	Orem School	80%
Alpine District	Eaglecrest School	80%
Alpine District	Rocky Mountain School	80%
Alpine District	Orchard School	79%
Alpine District	Hidden Hollow School	79%
Alpine District	Sego Lily School	79%
Alpine District	Manila School	79%
Alpine District	Alpine School	79%
Alpine District	Freedom School	78%
Alpine District	Snow Springs School	77%
Alpine District	Riverview School	77%
Alpine District	Sage Hills School	77%
Alpine District	Aspen School	76%
Alpine District	Barratt School	76%
Alpine District	Saratoga Shores School	76%
Alpine District	Legacy School	75%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Alpine District	Silver Lake Elementary	75%
Alpine District	Vineyard School	75%
Alpine District	Lindon School	74%
Alpine District	Black Ridge School	74%
Alpine District	Northridge School	74%
Alpine District	Desert Sky	74%
Alpine District	Cascade School	74%
Alpine District	Dry Creek School	73%
Alpine District	Meadow School	73%
Alpine District	Belmont School	73%
Alpine District	Thunder Ridge School	72%
Alpine District	River Rock School	71%
Alpine District	Harvest School	71%
Alpine District	Shelley School	71%
Alpine District	North Point School	70%
Alpine District	Trailside Elementary	69%
Alpine District	Harbor Point Elementary	68%
Alpine District	Pony Express School	68%
Alpine District	Central School	67%
Alpine District	Cherry Hill School	67%
Alpine District	Lehi School	66%
Alpine District	Eagle Valley School	64%
Alpine District	Centennial Elementary	63%
Alpine District	Windsor School	60%
Alpine District	Parkside Elementary	60%
Alpine District	Grovecrest School	60%
Alpine District	Forbes School	60%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Alpine District	Bonneville School	59%
Alpine District	Mountain Trails School	57%
Alpine District	Brookhaven School	56%
Alpine District	Mount Mahogany School	54%
Alpine District	Westmore School	54%
Alpine District	Greenwood School	50%
American Leadership Academy	American Leadership Academy	77%
American Preparatory Academy	American Preparatory Academy - Draper #1	95%
American Preparatory Academy	American Preparatory Academy - Salem	92%
American Preparatory Academy	American Preparatory Academy - Draper #2	91%
American Preparatory Academy	American Preparatory Academy - Accelerated School	91%
American Preparatory Academy	American Preparatory Academy - The School for New Americans	61%
Ascent Academies of Utah	Ascent Academies of Utah Saratoga Springs	77%
Ascent Academies of Utah	Ascent Academies of Utah Lehi	75%
Ascent Academies of Utah	Ascent Academies of Utah West Jordan	42%
Ascent Academies of Utah	Ascent Academies of Utah - West Valley	36%
Athlos Academy of Utah	Athlos Academy of Utah	38%
Beaver District	Belknap School	82%
Beehive Science & Technology Academy	Beehive Science & Technology Academy Elementary	85%
Box Elder District	Century School	91%
Box Elder District	Fielding School	85%
Box Elder District	Three Mile Creek School	80%
Box Elder District	Golden Spike Elementary	80%
Box Elder District	Garland School	79%
Box Elder District	Discovery School	75%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Box Elder District	North Park School	73%
Box Elder District	Lake View School	71%
Box Elder District	Mckinley School	71%
Bridge Elementary School	Bridge Elementary School	56%
Cache District	River Heights School	91%
Cache District	Birch Creek School	88%
Cache District	Sunrise School	88%
Cache District	Heritage School	86%
Cache District	North Park School	85%
Cache District	Lewiston School	83%
Cache District	Providence School	80%
Cache District	White Pine School	80%
Cache District	Summit School	77%
Cache District	Wellsville School	77%
Cache District	Nibley School	76%
Cache District	Lincoln School	75%
Cache District	Cedar Ridge School	75%
Cache District	Canyon School	72%
Cache District	Millville School	71%
Cache District	Greenville School	68%
Cache District	Mountainside School	64%
Canyon Grove Academy	Canyon Grove Academy	80%
Canyon Rim Academy	Canyon Rim Academy	86%
Canyons District	Brookwood School	88%
Canyons District	Butler School	86%
Canyons District	Canyon View School	86%
Canyons District	Peruvian Park School	85%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Canyons District	Park Lane School	84%
Canyons District	Sunrise School	84%
Canyons District	Willow Canyon School	84%
Canyons District	Ridgecrest School	82%
Canyons District	East Sandy School	81%
Canyons District	Lone Peak School	81%
Canyons District	Draper School	80%
Canyons District	Willow Springs School	79%
Canyons District	Alta View School	78%
Canyons District	Oakdale School	76%
Canyons District	Altara School	74%
Canyons District	Quail Hollow School	73%
Canyons District	Oak Hollow School	71%
Canyons District	Silver Mesa School	67%
Canyons District	Sprucewood School	65%
Canyons District	Midvalley School	63%
Canyons District	Glacier Hills Elementary	58%
Canyons District	East Midvale School	54%
Canyons District	Crescent School	54%
Canyons District	Sandy School	49%
Canyons District	Midvale School	33%
Carbon District	Castle Heights School	79%
Carbon District	Creekview School	75%
Carbon District	Wellington School	64%
Carbon District	Sally Mauro School	53%
Channing Hall	Channing Hall	83%
Davinci Academy	Davinci Academy	60%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Davis District	Kay's Creek Elementary	95%
Davis District	Windridge School	94%
Davis District	Kaysville School	90%
Davis District	Stewart School	90%
Davis District	Valley View School	89%
Davis District	South Weber School	88%
Davis District	Reading School	88%
Davis District	Tolman School	87%
Davis District	Boulton School	86%
Davis District	Holbrook School	86%
Davis District	Snow Horse School	86%
Davis District	Taylor School	84%
Davis District	Canyon Creek School	84%
Davis District	Morgan School	84%
Davis District	Bountiful School	83%
Davis District	Bluff Ridge School	83%
Davis District	Farmington School	82%
Davis District	Mountain View School	80%
Davis District	Parkside School	80%
Davis District	Orchard School	80%
Davis District	Oak Hills School	80%
Davis District	Endeavour School	79%
Davis District	Creekside School	79%
Davis District	Syracuse School	79%
Davis District	West Point School	79%
Davis District	Buffalo Point School	78%
Davis District	Lakeside School	77%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Davis District	Eagle Bay School	77%
Davis District	H C Burton School	77%
Davis District	Columbia School	76%
Davis District	Sunburst School	76%
Davis District	Odyssey School	76%
Davis District	Whitesides School	76%
Davis District	Cook School	75%
Davis District	Island View Elementary	75%
Davis District	West Bountiful School	74%
Davis District	Sand Springs School	73%
Davis District	Heritage School	72%
Davis District	Knowlton School	71%
Davis District	Muir School	71%
Davis District	Clinton School	68%
Davis District	Adams School	67%
Davis District	Layton School	67%
Davis District	Antelope School	67%
Davis District	Ellison Park School	66%
Davis District	East Layton School	65%
Davis District	Meadowbrook School	63%
Davis District	King School	63%
Davis District	Sunset School	62%
Davis District	Adelaide School	62%
Davis District	South Clearfield School	60%
Davis District	Hill Field School	59%
Davis District	West Clinton School	58%
Davis District	Woods Cross School	57%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Davis District	Foxboro School	56%
Davis District	Wasatch School	55%
Davis District	Holt School	49%
Davis District	Lincoln School	40%
Dual Immersion Academy	Dual Immersion Academy	67%
Duchesne District	Altamont School	71%
Duchesne District	East School	61%
Duchesne District	Kings Peak School	59%
Duchesne District	Centennial School	58%
Early Light Academy at Daybreak	Early Light Academy at Daybreak	82%
Edith Bowen Laboratory School	Edith Bowen Laboratory School	84%
Entheos Academy	Entheos Academy Kearns	79%
Entheos Academy	Entheos Academy Magna	50%
Esperanza School	Esperanza School	55%
Excelsior Academy	Excelsior Academy	66%
Franklin Discovery Academy	Franklin Discovery Academy	69%
Freedom Preparatory Academy	Freedom Preparatory Academy - Vineyard	74%
Freedom Preparatory Academy	Freedom Preparatory Academy	66%
Freedom Preparatory Academy	Freedom Preparatory Academy Washington	64%
Gateway Preparatory Academy	Gateway Preparatory Academy	74%
George Washington Academy	George Washington Academy	80%
Good Foundations Academy	Good Foundations Academy	68%
Grand District	Helen M. Knight School	59%
Granite District	Howard R. Driggs School	>= 95%
Granite District	Oakridge School	93%
Granite District	Upland Terrace School	92%
Granite District	Crestview School	91%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Granite District	Morningside School	90%
Granite District	William Penn School	83%
Granite District	Cottonwood School	82%
Granite District	Oakwood School	78%
Granite District	Calvin S. Smith School	77%
Granite District	Neil Armstrong Academy	76%
Granite District	Woodstock School	76%
Granite District	Bennion School	73%
Granite District	Diamond Ridge School	70%
Granite District	Fox Hills School	69%
Granite District	West Valley School	68%
Granite District	Whittier School	65%
Granite District	Thomas W. Bacchus School	63%
Granite District	Woodrow Wilson School	63%
Granite District	Valley Crest School	63%
Granite District	Academy Park School	62%
Granite District	Rolling Meadows School	62%
Granite District	Jim Bridger School	57%
Granite District	West Kearns School	57%
Granite District	Taylorsville School	57%
Granite District	South Kearns School	56%
Granite District	Hillside School	56%
Granite District	Vista School	56%
Granite District	David Gourley School	55%
Granite District	Stansbury School	54%
Granite District	Hillsdale School	51%
Granite District	Hunter School	51%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Granite District	Pioneer School	49%
Granite District	Beehive School	48%
Granite District	Elk Run Elementary	48%
Granite District	Silver Hills School	47%
Granite District	Arcadia School	46%
Granite District	Lake Ridge School	45%
Granite District	Monroe School	44%
Granite District	Gearld Wright School	43%
Granite District	Magna School	42%
Granite District	Pleasant Green School	40%
Granite District	Philo T. Farnsworth School	39%
Granite District	Granger School	39%
Granite District	James E. Moss School	38%
Granite District	Olene Walker Elementary	38%
Granite District	Plymouth School	33%
Granite District	Jackling School	33%
Granite District	Copper Hills School	32%
Granite District	Lincoln School	29%
Guadalupe School	Guadalupe School	54%
Hawthorn Academy	Hawthorn Academy South Jordan	75%
Hawthorn Academy	Hawthorn Academy West Jordan	66%
Highmark Charter School	Highmark Charter School	82%
Ignite Entrepreneurship Academy	Ignite Entrepreneurship Academy	66%
Iron District	Cedar North School	83%
Iron District	Iron Springs School	81%
Iron District	Cedar East School	74%
Iron District	Cedar South School	68%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Iron District	Parowan School	66%
Iron District	Fiddlers Canyon School	65%
Iron District	Enoch School	62%
Iron District	Three Peaks School	61%
Jefferson Academy	Jefferson Academy	92%
John Hancock Charter School	John Hancock Charters School Eagle Mountain	59%
Jordan District	Eastlake School	86%
Jordan District	Elk Meadows School	85%
Jordan District	Herriman School	84%
Jordan District	Monte Vista School	83%
Jordan District	Jordan Hills School	82%
Jordan District	Westland School	82%
Jordan District	South Jordan School	82%
Jordan District	Southland School	81%
Jordan District	Butterfield Canyon School	81%
Jordan District	Welby School	81%
Jordan District	Riverton School	81%
Jordan District	Jordan Ridge School	79%
Jordan District	Blackridge School	77%
Jordan District	Golden Fields School	76%
Jordan District	Oak Leaf Elementary	76%
Jordan District	Falcon Ridge School	75%
Jordan District	Bastian School	74%
Jordan District	Rosamond School	73%
Jordan District	Rose Creek School	73%
Jordan District	Foothills School	70%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Jordan District	Hayden Peak School	69%
Jordan District	Ridge View Elementary	68%
Jordan District	Midas Creek School	68%
Jordan District	Fox Hollow School	68%
Jordan District	Mountain Point Elementary	68%
Jordan District	Aspen Elementary	68%
Jordan District	Bluffdale School	67%
Jordan District	Oakcrest School	67%
Jordan District	Antelope Canyon Elementary	67%
Jordan District	Silver Crest School	65%
Jordan District	Riverside School	63%
Jordan District	Copper Canyon School	61%
Jordan District	Heartland School	60%
Jordan District	Oquirrh School	60%
Jordan District	Mountain Shadows School	58%
Jordan District	Terra Linda School	53%
Jordan District	Daybreak School	51%
Jordan District	Westvale School	48%
Jordan District	Columbia School	45%
Jordan District	Majestic School	38%
Juab District	Mona School	73%
Juab District	Nebo View School	73%
Juab District	Red Cliff School	63%
Kane District	Kanab School	77%
Lakeview Academy	Lakeview Academy	80%
Leadership Learning Academy	Leadership Learning Academy	88%
Leadership Learning Academy	Leadership Learning Academy - Ogden	44%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Legacy Preparatory Academy	Legacy Preparatory Academy	82%
Lincoln Academy	Lincoln Academy	81%
Logan City District	Woodruff School	80%
Logan City District	Hillcrest School	75%
Logan City District	Wilson School	67%
Logan City District	Ellis School	67%
Logan City District	Bridger School	63%
Millard District	Fillmore School	71%
Millard District	Delta North School	69%
Monticello Academy	Monticello Academy West Point	83%
Monticello Academy	Monticello Academy	75%
Morgan District	Mountain Green School	88%
Morgan District	Morgan School	82%
Mountain Sunrise Academy	Mountain Sunrise Academy	63%
Mountain West Montessori Academy	Mountain West Montessori Academy	78%
Mountainville Academy	Mountainville Academy	90%
Murray District	Longview School	84%
Murray District	Viewmont School	82%
Murray District	Mcmillan School	77%
Murray District	Horizon School	66%
Murray District	Parkside School	35%
Navigator Pointe Academy	Navigator Pointe Academy	73%
Nebo District	Maple Ridge School	88%
Nebo District	Park View School	86%
Nebo District	Rees School	85%
Nebo District	Mapleton School	85%
Nebo District	East Meadows School	81%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Nebo District	Canyon School	80%
Nebo District	Sage Creek School	76%
Nebo District	Hobble Creek School	75%
Nebo District	Larsen School	75%
Nebo District	Sierra Bonita Elementary	74%
Nebo District	Foothills School	72%
Nebo District	Nebo Online School	70%
Nebo District	Meadow Brook School	70%
Nebo District	Cherry Creek School	69%
Nebo District	Park School	69%
Nebo District	Apple Valley School	68%
Nebo District	Wilson School	68%
Nebo District	Salem School	67%
Nebo District	Art City School	66%
Nebo District	Spanish Oaks School	66%
Nebo District	Riverview School	66%
Nebo District	Westside School	65%
Nebo District	Spring Lake School	63%
Nebo District	Orchard Hills School	61%
Nebo District	Taylor School	61%
Nebo District	Goshen School	60%
Nebo District	Mt. Loafer School	58%
Nebo District	Santaquin School	57%
Nebo District	Brookside School	56%
Nebo District	Brockbank School	55%
Nebo District	Barnett School	49%
Noah Webster Academy	Noah Webster Academy	68%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
North Davis Preparatory Academy	North Davis Preparatory Academy	59%
North Sanpete District	Mt. Pleasant School	70%
North Star Academy	North Star Academy	84%
North Summit District	North Summit School	75%
Odyssey Charter School	Odyssey Charter School	>= 95%
Ogden City District	Shadow Valley School	84%
Ogden City District	Liberty Elementary School	59%
Ogden City District	Wasatch School	58%
Ogden City District	Polk School	57%
Ogden City District	Heritage School	48%
Ogden City District	East Ridge Elementary School	48%
Ogden City District	Lincoln School	47%
Ogden City District	New Bridge School	43%
Ogden City District	Odyssey School	36%
Ogden Preparatory Academy	Ogden Preparatory Academy	42%
Park City District	Jeremy Ranch School	94%
Park City District	Trailside School	89%
Park City District	McPolin School	87%
Park City District	Parley's Park School	83%
Promontory School of Expeditionary Learning	Promontory School of Expeditionary Learning	58%
Providence Hall	Providence Hall	61%
Provo District	Rock Canyon School	94%
Provo District	Canyon Crest School	92%
Provo District	Lakeview School	89%
Provo District	Westridge School	85%
Provo District	Wasatch School	83%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Provo District	Edgemont School	80%
Provo District	Sunset View School	76%
Provo District	Provost School	71%
Provo District	Amelia Earhart School	69%
Provo District	Provo Peaks School	61%
Provo District	Timpanogos School	61%
Provo District	Franklin School	57%
Provo District	Spring Creek School	46%
Quest Academy	Quest Academy	80%
Ranches Academy	Ranches Academy	80%
Reagan Academy	Reagan Academy	70%
Renaissance Academy	Renaissance Academy	80%
Salt Lake District	Indian Hills School	90%
Salt Lake District	Wasatch School	89%
Salt Lake District	Nibley Park School	89%
Salt Lake District	Ensign School	88%
Salt Lake District	Bonneville School	88%
Salt Lake District	Uintah School	86%
Salt Lake District	Dilworth School	86%
Salt Lake District	Beacon Heights School	86%
Salt Lake District	Highland Park School	79%
Salt Lake District	Whittier School	76%
Salt Lake District	Emerson School	74%
Salt Lake District	North Star School	67%
Salt Lake District	Newman School	51%
Salt Lake District	Liberty School	50%
Salt Lake District	Washington School	49%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Salt Lake District	Mountain View School	47%
Salt Lake District	Edison School	45%
Salt Lake District	Parkview School	44%
Salt Lake District	Escalante School	40%
San Juan District	Blanding School	69%
San Juan District	Montezuma Creek School	34%
Scholar Academy	Scholar Academy	43%
Sevier District	Pahvant School	72%
Sevier District	Monroe School	71%
Sevier District	Salina School	69%
South Sanpete District	Gunnison Valley School	78%
South Sanpete District	Ephraim School	77%
South Sanpete District	Manti School	76%
South Summit District	South Summit School	74%
Summit Academy	Summit Academy - Bluffdale	90%
Summit Academy	Summit Academy - Independence	87%
Summit Academy	Summit Academy - Draper Campus	80%
Syracuse Arts Academy	Syracuse Arts Academy - North	69%
Syracuse Arts Academy	Syracuse Arts Academy - Antelope	59%
Terra Academy	Terra Academy	66%
Thomas Edison	Thomas Edison - South	94%
Thomas Edison	Thomas Edison - North	79%
Timpanogos Academy	Timpanogos Academy	73%
Tooele District	Rose Springs School	78%
Tooele District	Stansbury Park School	77%
Tooele District	Old Mill School	74%
Tooele District	Copper Canyon School	63%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Tooele District	Willow School	63%
Tooele District	Middle Canyon School	59%
Tooele District	Overlake School	56%
Tooele District	Grantsville School	55%
Tooele District	Settlement Canyon School	54%
Tooele District	Sterling School	53%
Tooele District	Twenty Wells Elementary	53%
Tooele District	Northlake School	48%
Treeside Charter School	Treeside Charter School	60%
Uintah District	Maeser School	82%
Uintah District	Discovery School	75%
Uintah District	Ashley School	71%
Uintah District	Davis School	69%
Uintah District	Naples School	68%
Utah Virtual Academy	Utah Virtual Academy	44%
Valley Academy	Valley Academy	60%
Venture Academy	Venture Academy	74%
Vista School	Vista School	78%
Voyage Academy	Voyage Academy	77%
Wallace Stegner Academy	Wallace Stegner Academy Kearns K-12	74%
Wallace Stegner Academy	Wallace Stegner Academy	64%
Wallace Stegner Academy	Wallace Stegner Academy West Valley	60%
Wasatch District	Midway School	87%
Wasatch District	Old Mill School	75%
Wasatch District	Heber Valley School	62%
Wasatch District	Daniels Canyon School	62%
Wasatch District	J.R. Smith School	57%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Wasatch Peak Academy	Wasatch Peak Academy	70%
Wasatch Waldorf Charter School	Wasatch Waldorf Charter School	63%
Washington District	Crimson View School	>= 95%
Washington District	South Mesa Elementary	92%
Washington District	Arrowhead School	89%
Washington District	Majestic Fields School	85%
Washington District	Three Falls School	84%
Washington District	Riverside School	84%
Washington District	Santa Clara School	82%
Washington District	Diamond Valley School	80%
Washington District	Bloomington School	79%
Washington District	Enterprise School	78%
Washington District	Heritage School	77%
Washington District	Horizon School	76%
Washington District	Washington School	76%
Washington District	Little Valley School	75%
Washington District	Desert Canyons Elementary	72%
Washington District	Hurricane School	72%
Washington District	Sunset School	71%
Washington District	Red Mountain School	71%
Washington District	Panorama School	70%
Washington District	Bloomington Hills School	70%
Washington District	LaVerkin School	69%
Washington District	Paradise Canyon	68%
Washington District	Legacy School	66%
Washington District	Sandstone School	59%
Washington District	Coral Canyon School	57%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Weber District	Lomond View School	94%
Weber District	Country View School	82%
Weber District	Silver Ridge Elementary	81%
Weber District	Green Acres School	80%
Weber District	Plain City School	79%
Weber District	Haven Bay Elementary	79%
Weber District	North Ogden School	79%
Weber District	Farr West School	79%
Weber District	West Weber School	79%
Weber District	Roy School	78%
Weber District	Orchard Springs	78%
Weber District	Valley School	76%
Weber District	Majestic School	76%
Weber District	Bates School	72%
Weber District	Hooper School	72%
Weber District	Uintah School	71%
Weber District	H. Guy Child School	67%
Weber District	Kanesville School	65%
Weber District	Riverdale School	63%
Weber District	Valley View School	62%
Weber District	Washington Terrace School	60%
Weber District	Freedom School	59%
Weber District	Municipal School	57%
Weber District	Roosevelt School	55%
Weber District	Burch Creek School	54%
Weber District	Pioneer School	52%
Weber District	West Haven School	51%

LEA Name	School Name	2025 Percent At or Above Benchmark on Acadience Reading
Weber District	North Park School	51%
Weber District	Midland School	49%
Weber District	Lakeview School	31%



C. Science of Reading Training Results



Utah Foundations of Reading Assessment (UFORA)

The following information was published by the Utah State Board of Education (USBE) in its 2025 *Utah Educator Preparation Program (EPP) Annual Report*:

The Literacy Preparation Assessment

During the 2020 General Session, the Utah State Legislature established a new licensing requirement for individuals seeking a professional teaching license in early childhood, elementary, and special education (see Utah Code 53E-6-301). Candidates seeking licensure in these areas are required to pass a literacy preparation assessment before they are eligible to receive a professional educator license.

During the pilot phase (September 1, 2022 to August 31, 2024), candidates who took the Utah Foundations of Reading test had to pass with a minimum score of 100 or higher, which is the lowest score a candidate can receive if they successfully finish the test. In Spring of 2024, a standard setting was conducted on Utah pilot test data and the statewide passing cut score of 240 was established. Starting September 1, 2024, any candidate who applies for a professional teaching license in early childhood, elementary or special education must receive a score of 240 or higher on the Utah Foundations of Reading test.

Statewide Literacy Preparation Assessment Results 2023-2025

School Year	Number of Test Takers	Average Score	Passing Rate
2022-2023	1,630	242	56%
2023-2024	2,383	248	70%
2024-2025	2,197	256	88%

Source: USBE's 2025 *Utah Educator Preparation Program (EPP) Annual Report*

2024-2025 Literacy Preparation Assessment Results by Institution of Higher Education

Institution of Higher Education	Number of Test Takers	Average Score	Pass Rate
Brigham Young University	212	264	93%
Southern Utah University	91	257	92%
University of Utah	56	255	91%
Utah State University	188	260	89%
Utah Tech University	34	264	94%

Institution of Higher Education	Number of Test Takers	Average Score	Pass Rate
Utah Valley University	216	255	88%
Weber State University	80	255	88%
Western Governors University	1,110	254	88%
Westminster University	n < 10	n < 10	n < 10

n < 10 = results are masked for privacy due to low number of test takers

Source: USBE's 2025 Utah Educator Preparation Program (EPP) Annual Report

2024-2025 Literacy Preparation Assessment Results by Alternate Pathways to Professional Educator Licensing (APPEL) program

APPEL Program Name	Number of Test Takers	Average Score	Pass Rate
Alpine School District	10	254	80%
American Preparatory Academy	10	258	90%
Jordan School District	13	255	92%
Northeastern Utah Educational Services	16	261	94%
Utah Association of Public Charter Schools	28	253	89%
Utah State Board of Education (APPEL-SpEd)	53	247	75%

NOTE: Only APPEL programs with 10 or more test takers are presented.

Source: USBE's 2025 Utah Educator Preparation Program (EPP) Annual Report

Utah's Alternative Pathways to Professional Educator License (APPEL) programs were created in 2020 and prepare individuals to meet the requirements of a professional teaching license. APPEL programs are administered by local school districts, charter schools, private schools, consortiums of districts or schools, or the Board. Generally, candidates who are enrolled in an APPEL program have earned a bachelor's degree or higher from an institution of higher education and are employed in a school which has a partnership with an approved APPEL program.

Language Essentials for Teachers of Reading and Spelling (LETRS)

The following information was published by USBE in its *Grant for Professional Learning and Elementary Teacher Preparation Assessment Grant* report published in November 2023:

Literacy (LETRS) Professional Learning Outcomes

According to post survey results, the literacy (LETRS) professional learning challenged ninety-nine percent of educators to always or sometimes think differently about their instructional practice. Ninety-six percent of educators stated that the literacy (LETRS) professional learning deepened the understanding of early literacy. Ninety-seven percent of educators directly used the knowledge, skills, and strategies learned in the literacy (LETRS) professional learning with their students. Ninety-seven percent reported that the literacy (LETRS) professional learning helped them to continue to grow as a professional.

OLAG compiled the following data from a report of all LETRS participants provided by USBE:

District Name	Completed LETRS	Enrolled in LETRS	Completion Percentage
Alpine	1097	1268	87%
Beaver	33	36	92%
Box Elder	168	200	84%
Cache	275	288	95%
Canyons	443	534	83%
Carbon	45	49	92%
Daggett	7	8	88%
Davis	976	1087	90%
Duchesne	46	52	88%
Emery	34	48	71%
Garfield	5	8	63%
Grand	21	26	81%
Granite	863	996	87%
Iron	129	138	93%
Jordan	759	850	89%
Juab	16	17	94%
Kane	8	9	89%
Logan	106	120	88%
Millard	42	46	91%
Morgan	55	58	95%
Murray	98	114	86%
Nebo	514	583	88%
North Sanpete	7	10	70%
North Summit	3	6	50%
Ogden	86	117	74%

District Name	Completed LETRS	Enrolled in LETRS	Completion Percentage
Park City	63	72	88%
Piute	9	10	90%
Provo	212	268	79%
Rich	11	11	100%
Salt Lake	385	422	91%
San Juan	44	58	76%
Sevier	64	67	96%
South Sanpete	27	30	90%
South Summit	14	17	82%
Tintic	7	7	100%
Tooele	191	204	94%
Uintah	23	23	100%
Utah DOE	1077	1436	75%
Utah State Office of Education	14	21	67%
Utah Virtual	4	7	57%
Wasatch	94	112	84%
Washington	291	318	92%
Wayne	2	2	100%
Weber	465	517	90%

Source: Auditor generated from USBE data.

D. State Criteria For Retention Policies Based on Literacy Gaps



Senate Bill (S.B.) 241 Early Literacy, from the 2026 General Legislative Session, implemented a retention policy that begins in 2030. This policy requires students to be retained in third grade if they are not meeting grade-level reading benchmarks.²⁸ Utah is not the first state to implement this type of policy. The table below contains retention policy components found in other states.

State	Grade Level	Assessment(s) Used	Alternative Options ²⁹	Other "Good Cause Exemptions" ³⁰
Arizona	3rd	Arizona's Academic Standards Assessment (AASA)	• Summer school • Promotion at midyear of retention • Demonstrate 3rd grade reading skills through multiple state-approved reading assessments	• Student has less than 3 years of English instruction • Referral to or evaluation for special education • Diagnosed with a significant reading impairment • IEP team determines that moving to 4th grade is appropriate
Indiana	3rd	Indiana Reading Evaluation and Determination (IREAD)—beginning in Spring of a student's 2nd grade school year	• Summer administration of IREAD	• Student has an intellectual disability • IEP team determines that moving to 4th grade is appropriate • Less than 2 years of English Instruction and team determines that moving to 4th grade is appropriate • Passed the state's ILEARN math assessment

²⁸ There are exemptions for certain situations, such as when a student's Individualized Education Plan (IEP) states that participating in the Acadience Reading assessment would be inappropriate.

²⁹ Students must take the required third-grade assessment, but students who do not pass have alternative options to demonstrate proficiency to be promoted to fourth grade.

³⁰ "Good Cause Exemptions" is the term used in S.B. 241 to identify situations where a student can still be promoted to fourth grade regardless of performance on the required assessment.

				• Student has received intensive intervention for at least 2 years • Student has already been retained in 3rd grade • Student was retained twice in grades K-2
Mississippi	3rd	Mississippi Academic Assessment Program (MAAP)	• Two opportunities to pass the 3rd Grade Reading Alternative Assessment • Receive a proficient score after the writing portion of the MAAP is scored	• Less than 2 years of English instruction • IEP determined that it would not be appropriate for the student to participate in the MAAP • Student with disability that has received at least 2 years of intensive reading remediation • Student with disability that was already retained in grades K-3 • Received at least 2 years of intensive remediation and has been retained for 2 years in grades K-3
Utah (Will be implemented in the 2030 school year)	3rd	Acadience Reading	• Benchmark is met on a summer assessment following summer school • Student portfolio demonstrates proficiency equivalent to	• Student scores below benchmark (not well below) and makes typical progress • Fewer than 3 years of English instruction • IEP or 504 determined it would not be appropriate for the

			Acadience Reading	student to participate in Acadience Reading • Student has already been retained in grades K-3 and has received at least 2 years of intensive remediation • Student moved to the school in grade 3 and previously did not have an Individualized Reading Plan • Student made above typical progress for multiple years on the reading benchmark
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The good cause exemptions offered to students in each of these states are similar. Indiana provides an additional exemption for students proficient in math. Utah provides additional exemptions for students with their first Utah enrollment in third grade and for those that demonstrate proficiency through a portfolio. However, we cannot compare the difficulty of promotion in each of these states. Indiana and Mississippi use multiple-choice exams to determine promotion or retention. Utah and Arizona, on the other hand, use tests that include an oral reading fluency portion.



E. Science of Reading Training Analysis



We conducted an analysis on the science of reading trainings provided to current teachers and teacher candidates. We asked the following analytical questions:

- Were teachers who passed the UFORA³¹ assessment more effective in moving students to reading benchmarks than those who failed the UFORA assessment?
- Were teachers who completed LETRS³² training more effective in moving students to reading benchmarks than those who did not complete LETRS training?

The analysis combined teacher-, student-, class-, and school-level data from the Utah State Board of Education (USBE). Student-level factors included economically disadvantaged status, race/ethnicity, homelessness, and beginning-of-year and end-of-year Acadience Reading benchmark statuses. Teacher-level factors included training type (UFORA or LETRS), pass status, and years of experience. School- and class-level factors consisted of aggregated student demographic and performance variables.

We used a value-added approach to determine the association between pass status and benchmark gains. Specifically, we regressed end-of-year benchmark scores onto teacher pass status and controlled for beginning-of-year benchmark scores, student attributes, teacher attributes, and classroom composition. Additionally, we incorporated school and year fixed effects and class-size weights.

Results from the bivariate regression of end-of-year benchmark on pass status indicated that teachers who passed science of reading trainings had higher end-of-year benchmark scores than teachers who did not pass (coefficient = .0285, $p < .05$). However, after controlling for beginning-of-year benchmark scores, student attributes, teacher attributes, and classroom composition, there was no distinguishable difference between the end-of-year benchmark rates for teachers who did and did not pass the training (see Chapter 2, page 23).

³¹ UFORA: Utah Foundations of Reading Assessment

³² LETRS: Language Essentials for Teachers of Reading and Spelling

These results indicate that when comparing teachers who passed or failed UFORA or LETRS, there is on average no noticeable difference in their ability to improve the percentage of students who meet reading benchmark thresholds.^{33,34}

³³ A large majority of teachers passed UFORA or LETRS. Therefore, teachers that failed were likely surrounded by teachers who had passed and could have benefited from working in a professional learning community with those individuals who passed.

³⁴ This was based on the matches we were able to make. The match rate could be better with more matching data fields, such as birthdate, as we discuss in Chapter 2 of this report.



Agency Response Plans





June 8, 2026

Kade Minchey, CIA, CFE, Auditor General
Office of the Legislative Auditor General
Rebecca Lockhart House Building, Suite W315
PO Box 145315
Salt Lake City, UT 84114

Dear Mr. Minchey,

Please find below USBE's required response to Report 2026-12, *A Performance Audit of Public Education K-3 Reading Programs*. We appreciate the report's findings and recommendations, which highlight key risks and proposed responses. We appreciate the report's analysis of literacy outcomes, data systems, and implementation practices. These insights will help guide ongoing efforts to improve literacy outcomes for Utah students.

Since the audit was completed, the Legislature enacted S.B. 241 (2026), which further clarifies Utah's early literacy framework. The law raises the statewide goal to 80 percent of third-grade students reading at or above benchmark by 2030 and confirms that local education agencies (LEAs) are primarily responsible for implementation, including curriculum selection within statutory parameters, intervention delivery, and school-level accountability for results.

The audit recommendations present opportunities to strengthen system performance. Under the authority provided in S.B. 241, LEAs retain primary responsibility for instructional implementation and local accountability, while USBE provides coordination, guidance, and statewide outcome monitoring.

Consistent with legislative direction and the audit findings, USBE will focus on:

- Setting clear statewide expectations aligned with statute
- Improving data systems and transparency
- Providing guidance and tools to support local implementation
- Monitoring statewide progress toward literacy outcomes

USBE's monitoring role will remain system-level and outcome-focused, including the aggregation, analysis, and public reporting of statewide and LEA-level performance data. LEAs will remain responsible for implementation, school-level monitoring, instructional decisions, and accountability for addressing identified gaps and improving student outcomes.

This response is provided in accordance with Utah Code Annotated (UCA) 36-12-15.3. Because draft audit reports are protected under the Government Records Access and Management Act (UCA 63G-2-305), the Utah State Board of Education has not had the opportunity to review either the report or this response. Accordingly, the response may be revised at the direction of the Board, and any changes will be identified in the audit response update required under UCA 36-12-15.3(6).

With appreciation,

A handwritten signature in black ink, appearing to read "M. Hart", with a stylized flourish at the end.

Molly Hart, Ed.D.
State Superintendent of Public Instruction

cc:

Rod Hall, Utah State Board of Education (USBE), Audit Committee Chair
Leah Voorhies, USBE, Deputy Superintendent of Student Achievement
Debbie Davis, USBE, Chief Audit Executive

Chapter 1

Finding	Finding Description
1.1	The Percentage of Students Reaching Benchmark Has Lacked Movement

Recommendation 1.1

Every Local Education Agency should hold its schools accountable for early literacy goal setting and goal achievement. While accountability processes will vary to meet local needs, goal setting and assessing progress should happen at least three times a year following Acadience Reading administrations.

USBE Response

Recommendation is directed to Local Education Agencies, not the Utah State Board of Education; therefore, no response is provided.

Finding	Finding Description
1.2	Some LEAs and Schools Are Already Meeting the New Higher Goal

Recommendation 1.2

Local education agencies should ensure that they are addressing all six science of reading areas through early literacy curriculum(s).

USBE Response

Recommendation is directed to Local Education Agencies, not the Utah State Board of Education; therefore, no response is provided.

Recommendation 1.3

The Utah State Board of Education, through the Science of Reading [SOR] panel, should approve the specific combination of curriculum as a unit for any local education agency that meets the 80% goal for at least 2 consecutive years.

USBE Response

The USBE will implement an alternative action.

Explanation: USBE cannot waive statutory curriculum requirements, including the science of reading alignment requirements established in S.B. 241.

Who: The USBE Policy and Literacy teams, SOR Panel

Alternative Action: USBE will direct the SOR Panel to develop recommendations for a performance-informed technical validation model with the following components:

1. Analyze outcomes and examine the instructional practices of high-performing LEAs.
2. Determine whether those practices align, explicitly or implicitly, with SOR principles.
3. Issue advisory findings on effective practices rather than formal approval.

LEAs will:

1. Submit performance data and instructional descriptions
2. Participate in panel-led review discussions

USBE will:

1. Indicate on the existing dashboard when an LEA's use of curriculum materials outside the published SOR-aligned list meets the science of reading requirements in statute.

USBE will also review all Board Rules related to early literacy curriculum to ensure they align with Utah Code. Because S.B. 241 substantially revised USBE's early literacy responsibilities, USBE must align its work to the new law, beginning with updates to all Board Rules related to the science of reading.

How: The Policy and Literacy teams will review the Board Rules and recommend needed updates to a standing committee of the Board, including provisions for a performance-informed technical validation model. The standing committee will then forward its Rule update recommendations to the full board. USBE will document the substantive updates to each Board Rule related to early literacy over the next year, with a planned completion date of June 2027.

Completion Date: June 2027

Documentation: USBE tracks updates to all Rules and will report update dates in semi-annual audit response updates.

Timetable: September 2026; February 2027; June 2027

When: June 2027

Chapter 2

Finding	Finding Description
2.1	Science of Reading Teacher Training Has Not Been Linked to Measurable Student Outcomes

Recommendation 2.1

The Utah State Board of Education and local education agencies should include, and require vendors to include, a set of standard identifiers in all data sets to enable more complete analysis of programs and initiatives.

USBE Response

The USBE will implement the recommendation.

Who: Julie Clark, USBE K-12 Literacy Coordinator and Michael Iwasaki, USBE Purchasing Director

What: USBE will require standard identifiers in literacy-related data reporting, including CACTUS numbers where appropriate.

How: Update USBE procedures, vendor contract terms, and Board Rule requirements to require standard identifiers in literacy-related data reporting by USBE, LEAs, and applicable vendors.

Documentation: Board Rule updates. Contract terms and conditions updates.

Timetable: June 2027

When: June 2027

Recommendation 2.2

The Utah State Board of Education, in collaboration with university-based Educator Preparation Programs, should conduct data analysis to measure the impact of science of reading teacher training on K-12 student literacy scores. This analysis could include the Utah Foundations of Reading Assessment and Language Essentials for Teachers of Reading and Spelling and should be used to inform program improvements.

USBE Response

The USBE will implement an alternative action.

Who: Julie Clark, USBE K-12 Literacy Coordinator and Aaron Brough, USBE Director, Data and Statistics

Explanation/Alternative Action: USBE agrees that robust, data-driven analysis is essential to evaluate the return on investment of statewide literacy initiatives. Correlating educator preparation benchmarks—specifically the Utah Foundations of Reading Assessment (UFORA) and Language Essentials for Teachers of Reading and Spelling (LETRS)—with K-12 student outcomes, such as Acadience Reading growth data, would support continuous program improvement and progress toward the state’s goal of 80 percent third-grade reading proficiency by 2030.

However, USBE faces a significant structural constraint: although S.B. 241 allocated \$16 million to LEAs, Regional Education Service Agencies (RESAs), and the State Charter School Board for implementation and coaching, **it did not provide administrative funding or dedicated data analyst positions for USBE** to build, maintain, or execute the longitudinal data-matching framework required by this recommendation.

How: To fulfill the intent of the audit, USBE will pursue a phased implementation strategy leveraging existing statutory partnerships and seeking the necessary legislative appropriations.

1. **Establish a Higher Education Data-Sharing Framework:** In alignment with the higher education mandates in SB 241, USBE will engage with the Utah Board of Higher Education (UBHE), university-based Educator Preparation Programs (EPPs), and the Center for the School of the Future at Utah State University. USBE will work to establish data-sharing agreements that allow university research arms to securely utilize anonymized K-12 student growth data linked via Statewide Student Identifiers (SSIDs) to analyze the impact of teacher candidate training.
2. **Task the Science of Reading Panel:** USBE will formally charge the six-member Science of Reading Panel established by SB 241 to define the research parameters, key performance indicators (KPIs), and statistical methodology required for this longitudinal study during an upcoming quarterly meeting.
3. **Submit a Legislative Appropriations Request:** USBE will develop and submit a proposal for the upcoming legislative session. This request will seek targeted, one-time or ongoing funding to secure external research contracts or dedicated internal data-science staff to merge, manage, and analyze the UFORA, LETRS, and K-12 student literacy datasets safely and legally under FERPA guidelines.

Documentation: Data sharing agreements, Science of Reading Panel meeting minutes, legislative request documentation.

Timetable:

- **October 2026:** Formally task the SB 241 Science of Reading Panel with designing the evaluation methodology framework.
- **November 2026:** Submit a formal request to the Legislature requesting the administrative funds necessary to execute the full data analysis.
- **Spring 2027:** Convene a working group with UBHE and EPP representatives to draft the technical data-sharing agreements.
- **Fall 2027 (Dependent on Legislative Funding):** Initiate the first data-matching run combining UFORA, LETRS, and student assessment scores to provide the initial baseline impact report.

When: Fall 2027 (*contingent upon legislative appropriation*)

Recommendation 2.3

The Utah State Board of Education and local education agencies should, in future proposal requests for science of reading training, require potential vendors to guarantee proctored assessments.

USBE Response

The USBE will implement the recommendation.

Who: Julie Clark, USBE K-12 Literacy Coordinator and Michael Iwasaki, USBE Purchasing Director

What: USBE will seek a vendor that provides proctored literacy assessments.

How: Update USBE Standard Operating Procedures related to literacy assessment, revise vendor contract terms and conditions, and update Board Rule requirements so LEAs use proctors for assessments.

Documentation: Board Rule updates. Contract terms and conditions updates.

Timetable: June 2027

When: June 2027

Recommendation 2.4

The Utah State Board of Education leadership should set the tone for statewide focus on student growth and ensure that the measure of studies for student literacy programs is their impact on student proficiency.

USBE Response

The USBE will implement the recommendation.

Who: Julie Clark, K-3 Literacy Coordinator, Aaron Brough, USBE K-12 Data and Statistics Director, and Michael Iwasaki, USBE Purchasing Director

What: USBE will ensure that student proficiency is the primary measure used to evaluate student literacy programs.

How: Update standard operating procedures for reviewing and recommending literacy programs based on student outcomes. Review currently recommended programs against student outcome criteria, then publish and disseminate an updated recommendation list. Develop business rules for literacy program studies to ensure recommendations are based on student outcome data, particularly proficiency.

Documentation: Standard Operating Procedure updates. Literacy Program recommendations list updates. Board Rule updates. Contract terms and conditions updates.

Timetable: June 2027

When: June 2027

Finding	Finding Description
2.2	Science of Reading Personnel and Resources Are Underutilized

Recommendation 2.5

The Utah State Board of Education and Utah System of Higher Education should work with university-based Educator Preparation Programs to ensure that science of reading faculty have clear role statements that account for their time spent working on statewide literacy initiatives.

USBE Response

The USBE will work with the Utah System of Higher Education to implement the recommendation.

Who: Dr. Aaron Wilson, USBE Assistant Superintendent of Student Outcomes

What: USBE will work with Utah System of Higher Education staff to establish guidelines for science of reading faculty in Educator Preparation Programs so their role statements clearly account for time spent on statewide literacy initiatives.

How: USBE will meet with Utah System of Higher Education staff to develop the guidelines, introduce them to educator preparation programs, and update the monitoring process to track faculty time dedicated to reading initiatives.

Documentation: Development of guidelines. Board Rule update. Educator Preparation Program monitoring updates.

Timetable: Guidelines developed by May 2027. Board Rule update by September 2027. Monitoring beginning in September 2028.

When: December 2028

Recommendation 2.6

The Utah State Board of Education should improve its collaboration with the SOR panel, the Center for the School of the Future, science of reading faculty, and other key stakeholders outlined in S.B. 241. These collaborations should be focused on improving student proficiency.

USBE Response

The USBE will implement an alternative action; also see response to Recommendation 2.5.

Explanation: Because improvement in a collaborative relationship is difficult to measure objectively, USBE will focus its discussions with partners on student proficiency.

Who: The USBE Literacy team and the USBE Superintendency.

Alternative Action: USBE will ensure that agendas for meetings with literacy stakeholders include a specific item on student proficiency and that student outcome data are discussed as soon as they are available.

How: The literacy team will update the standard operating procedure for meetings with literacy stakeholders to require a focus on student proficiency in every agenda.

Documentation: Standard Operating Procedure updates. Agendas of meetings with literacy stakeholders focus on student proficiency.

Timetable: December 2026

When: December 2026

Chapter 3

Finding	Finding Description
3.1	Results are Mixed for Schools With S.B. 127 Coaches

Recommendation 3.1

LEAs should establish clear evidence-based metrics for determining the effectiveness of a school leader and then provide adequate support and accountability in meeting those metrics.

USB E Response

Recommendation is directed to Local Education Agencies, not the Utah State Board of Education; therefore, no response is provided.





Utah School Superintendents Association

860 East 9085 South, Sandy, UT 84094

801.878.0661

Dr. Lexi Cunningham, Executive Director

June 9, 2026

Kade Minchey, CIA, CFE, Auditor General
Office of the Legislative Auditor General
Utah State Capitol Complex
450 N. State Street, Suite N385
North Capitol Building
Salt Lake City, UT 84114

Dear Mr. Minchey:

Thank you for the opportunity to review *The Performance Audit of Public Education Reading Programs*. The Utah School Superintendents Association (USSA) appreciates the thorough work conducted by the Office of the Legislative Auditor General and the attention given to one of the most important priorities in public education—ensuring that every child learns to read proficiently.

USSA shares the audit's commitment to improving literacy outcomes for all students. Across the state, superintendents, district leaders, principals, and teachers have embraced the challenge of implementing Senate Bill 241 and strengthening literacy instruction through evidence-based practices, targeted interventions, and ongoing professional learning. While we recognize there is still work to be done, we are encouraged by the significant efforts underway in districts and schools throughout Utah.

The audit appropriately highlights the importance of accountability, consistency, and data-informed decision-making. USSA believes that meaningful improvement requires both clear expectations and ongoing support for educators. As districts continue implementing literacy initiatives, it is important that efforts remain focused on building educator capacity and supporting students rather than creating additional compliance requirements that divert time and resources away from instruction.

We also believe that local context matters. Utah's school districts vary significantly in size, demographics, staffing, and resources. While statewide goals and expectations are important, districts must retain the flexibility necessary to implement literacy strategies that meet the unique needs of their students and communities. Local innovation, combined with evidence-based practices and strong accountability measures, will continue to be a critical component of long-term success.

USSA remains committed to working collaboratively with the Legislature, the Utah State Board of Education, educators, families, and community partners to strengthen literacy outcomes for all students. We appreciate the audit's contribution to this important conversation.

Thank you again for your work and for the opportunity to provide feedback.

Respectfully,

Lexi Cunningham

Lexi Cunningham
USSA Executive Director

cc: Dan Linford, USSA, President
Greg Maughn, USSA, 2nd Vice President
Todd McKee, Incoming 2nd Vice President

Kodey Hughes, USSA, 1st Vice President
John Dodds, USSA, Past President



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Recommendation 1.1 (Governance)

Every local education agency should hold its schools accountable for early literacy goal setting and goal achievement. While accountability process will vary to meet local needs, goal setting and assessing progress should happen at least three times a year following Acadience Reading administration.

Association Response: USSA concurs with this recommendation.

Contact: Lexi Cunningham, Executive Director, Utah School Superintendents Association, lcunningham@usba.cc

What: For third grade students to be proficient readers by the end of third grade, every local education agency will hold schools accountable for early literacy goal setting and goal achievement. Goals will be set and data collected three times a year.

How: Three times during the school year, local education agencies will present updates on goals and goal achievement. USSA will remind local education agencies of the requirement to set yearly goals and present updates during board of education meetings.

Documentation: Information presented will be shared with members of local boards of education and attached to board packets.

When: Three times per year following Acadience Reading administration beginning with the 2026-2027 school year.

Recommendation 1.2 (Process)

Local education agencies should ensure that they are addressing all six science of reading areas through early literacy curriculum(s).

Association Response: USSA concurs with this recommendation.

Contact: Lexi Cunningham, Executive Director, Utah School Superintendents Association, lcunningham@usba.cc

What: Each local education agency will ensure that the six science of reading areas are addressed in district curriculum and instructional materials.

How: Local education agencies will develop a plan to ensure that all six areas of the science of reading are addressed. USSA will provide reminders throughout the year.

Documentation: Copies of the reminders sent to local education agencies.

When: Beginning with the 2026-2027, local education agencies will address the six science of reading areas.

Recommendation 2.1 (Structure)

The Utah State Board of Education and local education agencies should include and require vendors to include a set of standard identifiers in all data sets to enable more complete analysis of programs and initiatives.

Association Response: USSA concurs with this recommendation.

Contact: Lexi Cunningham, Executive Director, Utah School Superintendents Association, lcunningham@usba.cc

What: USSA will work in collaboration with the Utah State Board of Education to ensure that vendors include a set of standard identifiers in all data sets to enable more complete analysis of programs and initiatives. Standard identifiers will enable local education agencies to be more thorough in their goals setting and review of student progress.

How: USSA will meet with the Utah State Board of Education to determine how to proceed in address the action item.

Documentation: Copies of calendar appointment, notes, and action items will be collected.

When: Communication to the Utah State Board of Education will occur by August 2026.



Utah School Superintendents Association

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Dr. Lexi Cunningham, Executive Director

Recommendation 2.3 (Structure)

The Utah State Board of Education and local education agencies should, in future proposal requests for science of reading training, require potential vendors to guarantee proctored assessments

Association Response: USSA concurs with this recommendation.

Contact: Lexi Cunningham, Executive Director, Utah School Superintendents Association,

lcunningham@usba.cc

What: USSA will work in collaboration with the Utah State Board of Education to develop model language for requiring potential SOR vendors to guarantee proctored assessments.

How: USSA will meet with the Utah State Board of Education to determine how to proceed in address the action item.

Documentation: Copies of calendar appointment, notes, and action items will be collected.

When: Communication to the Utah State Board of Education will occur by August 2026.

Recommendation 3.1 (Structure)

Local education agencies should establish clear evidence-based metrics for determining the effectiveness of a school leader and then provide adequate support and accountability in meeting those metrics.

Association Response: USSA concurs with this recommendation.

Contact: Lexi Cunningham, Executive Director, Utah School Superintendents Association,

lcunningham@usba.cc

What: SB241: Early Literacy (2026) requires local school boards to adopt a principal evaluation program that includes K-3 effective implementation of the science of reading as well as improved student performance and academic progress on benchmark reading assessments.

How: Local education agencies will work to develop and/or modify their principal evaluation programs to meet the new requirements established by SB241: Early Literacy (2026). Each evaluation program will include evidence of how principals will be supported and how accountability will be measured. USSA will provide time and a platform for members to share examples of their programs.

Documentation: Examples of principal evaluation programs will be collected. Board of education agendas and minutes will show when programs were discussed and adopted.

When: Beginning in the 2026-2027 school year, local education agencies will begin the process of implementing their new principal evaluation programs



June 5, 2026

Kade R. Minchey, CIA, CFE, Auditor General
Office of the Legislative Auditor General
Utah State Capitol Complex
Rebecca Lockhart House Building, Suite W315
PO Box 145315
Salt Lake City, UT 84114-5315

Dear Mr. Minchey,

Thank you for the opportunity to review the exposure draft of The Performance Audit of Public Education K-3 Reading Programs. We appreciate the audit team's thorough work and the collaborative approach taken throughout this process. We appreciate the opportunity to respond to the audit findings and to outline our ongoing and planned efforts to strengthen the implementation and impact of Science of Reading (SOR) initiatives across the state.

First, we recognize the importance of stronger coordination with our colleagues at the Utah State Board of Education (USBE). As recently codified in Utah Code Subsection 53E-6-302(4) (through passage of [2026 SB 241](#)) and recommended in this audit, we will work more closely to clarify and better define the roles and expectations of SOR professors within educator preparation programs. This includes aligning on how these roles can most effectively contribute to improving reading literacy outcomes and supporting educators in applying evidence-based instructional practices.

Second, as additional assessment data becomes available through USBE, we will engage in careful and ongoing analysis to identify trends, gaps, and areas for improvement. These insights will directly inform revisions and enhancements to teacher preparation programs, particularly with respect to SOR pedagogy.

Finally, we recognize that there may not yet have been sufficient time or comprehensive data to determine the impact of hiring dedicated SOR professors on student reading outcomes as some SOR professors were hired less than two years ago. While early implementation efforts are underway, the absence of robust longitudinal assessment data limits our ability to draw definitive conclusions at this stage. We recognize this as a limitation and are committed to working with USBE to consider clearer metrics and evaluation frameworks moving forward to better assess the effectiveness of these initiatives.

We remain dedicated to continuous improvement, transparency, and collaboration as we work with our public education and higher education partners to strengthen literacy outcomes for all students.

Thank you,



Commissioner Geoff Landward

Recommendation 2.5 (Structure):

The Utah State Board of Education and Utah System of Higher Education need to work with university-based Educator Preparation Programs to ensure that science of reading faculty have clear role statements that account for their time spent working on statewide literacy initiatives.

Department Response 2.5: OCHE Concur

1. **Who:** Office of the Commissioner of Higher Education (OCHE), Angie Stallings, Deputy Commissioner, angie.stallings@ushe.edu and Steve Hood, Assistant Commissioner for Academic Affairs, steve.hood@ushe.edu
2. **What:** As recently codified in Utah Code Subsection 53E-6-302(4) (through passage of 2026 SB 241) OCHE will partner with USBE to work with the Utah Council of Education Deans (UCED) to coordinate university teacher preparation programs, including ensuring that science of reading faculty have clear role statements that account for their time spent working on statewide literacy initiatives.
3. **How:** OCHE will meet with USBE colleagues to draft role statements that account for SOR faculty time spent working on statewide literacy initiatives. Once finalized, OCHE will share the role statements with the Utah Council of Education Deans (UCED).
4. **Documentation:** Calendar appointments, meeting notes, and action items will validate the coordination and joint work.
5. **Timetable:** OCHE and USBE will convene the inaugural meeting by August 15, 2026 and intend to hold at least two additional meetings in 2026. Additional meetings will be scheduled as needed.
6. **When:** Communication to UCED will occur by October 2026.



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