

All Learners.  
Every Day.

# Dyslexia Resource Guide

An Update to Include Guidance on TISA and  
Characteristics of Dyslexia

Tennessee Department of Education | July 2023

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# Introduction

Language, barring significant barriers, is a natural process. Reading is not. Reading is a complex process of mapping speech sounds onto symbols of print that requires explicit, systematic instruction for most students. In fact, only about 35% of individuals learn to read easily with broad instruction (Young, 2023). The rest require systematic, explicit instruction to acquire reading skills, and a small percentage require more intensive support. Students who have not mastered basic reading skills by grade 3 are likely to still be behind in grade 8 and then in grade 12 (National Assessment of Educational Progress (NAEP) 2022).

Reading proficiency is influenced by a number of factors, including those neurobiological and environmental in nature. Dyslexia (and associated characteristics) is one of the most common causes of reading struggles and the specific learning disability of dyslexia is a common learning disability (Alexander et al., 2023; International Dyslexia Association (IDA) 2020). Without early intervention and support, students struggling with foundational reading skills, such as phonological and phonemic awareness, sound-symbol correspondence, alphabet knowledge, word identification and decoding, and encoding, are at risk for not meeting proficiency standards in literacy. These students need support in deficit skills, continued access to grade-level standards, high-quality Tier I instruction, and high-quality instructional materials (HQIM).

According to the most recent reports from The Nation's Report Card, national performance in reading has declined in both grades 4 and 8 since last reported in 2019. Tennessee's performance mirrors the national averages, with a decline of about 3 points in both grade 4 and grade 8 scores (NAEP, 2022). Nationally, in 2022, only 32% of students (averaged between grades 4 and 8) were at or above proficiency levels in reading (NAEP, 2022).

The Tennessee Department of Education (department) strives to ensure all students are reading on grade level by grade 3. The department has created the Reading 360 initiative which provides training for teachers in evidence-based reading instruction, home-literacy resources for families, and a free sounds-first curriculum for kindergarten through grade 2. The Tennessee Investment in Student Achievement (TISA) Act provides additional funding to support students with unique learning needs, including a category for students identified with characteristics of dyslexia. Summer learning camps, TN ALL Corps tutoring, and collaboration with organizations such as the Tennessee Technical Assistance Network (TN-TAN) and The Arc Tennessee are building a state-wide community of invested stakeholders.

The department last updated its *Dyslexia Resource Guide: Guidance on the "Say Dyslexia" Law* in April 2018. The original guide provided information on dyslexia and its characteristics, screening, Response to Instruction and Intervention framework (RTI<sup>2</sup>), data-based decision making, family resources, and student support, as well as other related areas. The department is updating guidance to ensure consistency with the TISA Act and Chapter 0520-12-05. This updated guidance adds a focus on how to identify and support students with characteristics of dyslexia in a timely and appropriate manner. In addition to providing a state-wide universal standard of practice for identifying and serving students with characteristics of dyslexia, this guide will provide additional district support for data-based decision making, dyslexia-specific intervention selection, TISA-specific policies and procedures, and family resources.

The guide is separated into three main sections. First, the RTI<sup>2</sup> Framework is summarized. This section presents how ALL learners receive educational support and how students with unique learning needs fit within an existing framework. Second, TISA, the unique learning need category of characteristics of dyslexia, and Individual Learning Plans for characteristics of dyslexia (ILP-D) are discussed. Third, student learning plans and services through Section 504 and special education through the Individuals with Disabilities Education Act (IDEA) are discussed. Whether a student is receiving support for reading as a unique learner through funding under TISA or through a Section 504 plan or IEP, instruction begins in Tier I and can be provided through the RTI<sup>2</sup> framework. This guide will discuss where students with a specific learning disability in basic reading and/or fluency, such as dyslexia, and where students with characteristics of dyslexia under TISA fit into the continuum of services. Additional resources are available through hyperlinks throughout this guide, in the appendices, and on the department's website.

## Response to Intervention and Instruction (RTI<sup>2</sup>)

### ***RTI<sup>2</sup> Overview***

Response to Instruction and Intervention (RTI<sup>2</sup>) is a framework designed to meet the needs of all students through high-quality instruction and increasingly intensive interventions. With RTI<sup>2</sup>, all students receive Tier I instruction. Some students may need more targeted support to engage with Tier I content and materials through Tier II instruction, intervention, learning acceleration, or enrichment, while a few students may need more intensive skills-based interventions in addition to Tier I instruction through Tier III supports. As outlined in Tenn. Code Ann. § 49-1-229 districts must identify characteristics of dyslexia through their existing RTI<sup>2</sup> universal screening process and provide appropriate tiered dyslexia-specific interventions for students identified with these characteristics. Detailed guidance on identifying characteristics of dyslexia through Tennessee Investment in Student Achievement (TISA) is outlined in detail later in this guide.

### **Tier I**

Tier I instruction, also known as core instruction, provides rich learning opportunities for all students that are aligned to the Tennessee academic standards and are responsive to student strengths and needs through the use of high-quality instructional materials (HQIM), embedded access points, and purposeful instructional scaffolds. The entire range of learners, including those identified with disabilities, students with characteristics of dyslexia, students who are identified as gifted, and English learners, are included and actively participate in Tier I instruction. Varying levels of support, based on multiple sources of data, is a hallmark of Tier I.

### **Tiers II and III**

Tiers II and III address the needs of struggling students and can address the needs of advanced students as well. Those students who require assistance beyond the usual time allotted for Tier I instruction should

receive additional opportunities for instructional support or intensive intervention aligned to the specific area of need. Advanced students should receive reinforcement and enrichment. Intervention includes explicit instruction within the area of need for all struggling students. For example, students with the characteristics of dyslexia should receive interventions that address the specific deficits identified through targeted assessments.

When teachers and school-level RTI<sup>2</sup> support teams are making placement decisions for tiered interventions and support, school-based teams should consider various forms of assessments, data, and information on the student. Such examples may include classroom-based and/or formative assessments, attendance records, past retention, performance on Tennessee Comprehensive Assessment Program (TCAP), and family history of reading and learning difficulties. Students at this level should receive targeted support in a small group or individual intervention targeting specific area(s) of deficit. Students who have received Tier I instruction and/or tiered interventions and continue to show marked difficulty in acquiring necessary reading, mathematics, and writing skills may need increased intensity in their intervention programming. Intensity can be increased through length, frequency, and duration of implementation. A problem-solving approach within an RTI<sup>2</sup> model is highly recommended so that the data team can tailor an intervention to an individual student. It typically has four stages: problem identification, analysis of problem, intervention planning, and response to intervention evaluation.



Intervention includes explicit instruction within the area of need for all struggling students. For example, students with the characteristics of dyslexia should receive interventions that address the specific related deficits identified through targeted assessments.

If a student is not successful with interventions provided through general education (i.e., RTI<sup>2</sup>), the student may be referred for evaluation to consider eligibility for special education as this may indicate a possible specific learning disability. See “Special Education and Section 504” section later in this guide for more information on referral processes.

## ***Universal Reading Screener (URS)***

All students are served through the RTI<sup>2</sup> framework, and this framework includes Tier I instruction in the general education classroom. Assessing students for characteristics of dyslexia begins in the general education classroom and is accomplished through the universal reading screening (URS) process.

RTI<sup>2</sup> is a process focused on prevention and early intervention that uses multiple sources of data for increasing access to Tier I instruction, learning acceleration, intervention, and transitions between tiers. Ongoing assessment is a major component of the RTI<sup>2</sup> framework, which includes the universal screening process and formative assessments in Tier I to inform data-based decision making. The requirement that districts must implement RTI<sup>2</sup> has resulted in districts establishing a universal screening process that best meets the needs of their students. This process should use multiple sources of data to identify individual student strengths and areas of need and that provides them with accurate information for making informed decisions about skills-specific interventions, gap closure through learning acceleration, re-teaching, and enrichment for each child.

For the URS process in grades K - 8 districts should administer a nationally normed, skills-based universal screener three times a year as part of the universal screening process. According to Hughes & Dexter (2011), a nationally normed skills-based universal screener is necessary because relying only on local performance could give a false impression of student proficiency. Universal screeners are not assessments in the traditional sense. They are brief, informative tools used to measure academic skills in six general areas (i.e., basic reading skills, reading fluency, reading comprehension, math calculation, math problem solving, and written expression). For additional information related to K-3 universal reading screener guidelines, please reference the TN [Universal Reading Screener Administration Guidelines](#).

Per the Tennessee Literacy Success Act, all students in kindergarten through grade 3 must participate in a universal screening process to identify those who may need additional support and/or other types of instruction, interventions, and suggestions for at home activities to support learning. See Tenn. Code Ann. § 49-1-905 and the [Tennessee Foundational Literacy Toolkit](#) resources for additional guidance. The universal screening process also plays an important role in fulfilling the requirements of Tennessee's dyslexia legislation, codified at Tenn. Code Ann. § 49-1-229. Passed during the 2016 legislative session, this law requires that districts implement a screening process for identifying characteristics of dyslexia. Districts with an appropriate, effective universal screening process in place will be able to use the information they collect to make important determinations about dyslexia-specific class-level support and interventions.

Information from the URS and additional data sources can further inform data-based decision-making regarding classroom support and intervention placement. With the addition of TISA, the URS is the core of



identification for students with the unique learning need of characteristics of dyslexia. The URS window occurs 3 times per school year with one administration each in the Fall, Winter, and Spring.

In grades 9-12, schools should collect multiple sources of data that can be incorporated into an early warning system (EWS). The EWS may include data from universal screeners, achievement tests (from both high school and grades K-8), End-of-Course (EOC) exams, student records (e.g., grades, behavioral patterns, attendance, retention, and past RTI<sup>2</sup> interventions), Tennessee Value-Added Assessment System (TVAAS) student score projections, and the ACT/SAT exam or other nationally normed assessments. EWS should include an attendance indicator, a behavior indicator (discipline history, et cetera), and an academic competencies indicator. Other factors included in EWS are for the district to decide. (Note: A template can be found on the department's [RTI<sup>2</sup> webpage under the Educator tab](#).) Districts will establish criteria for identifying students who are at-risk using this EWS by determining appropriate thresholds for each indicator (e.g., missing ten percent of instructional days may be a flag for attendance) and weighting each indicator to appropriately differentiate students based on local context (e.g., student population and school improvement plan goals). Students who flag for risk on the EWS should be considered for additional screeners, survey-level assessments, necessary classroom supports, and interventions as determined appropriate by the school-based decision-making team.

## **Summary**

RTI<sup>2</sup> is a general education framework designed to support all learners. The URS process is at the foundation and core of a successful RTI<sup>2</sup> framework. The URS helps to identify students at risk for academic struggle. Students who are struggling to meet grade level expectation measured on the URS should be administered additional diagnostic assessments and placed in appropriate interventions and provided necessary classroom supports. The URS process drives early identification and the provision of appropriately aligned instructional support and interventions. With the addition of TISA, URS also supports the identification of students with the unique learning need of characteristics of dyslexia and the provision of an individual learning plan for such characteristics, also called an ILP-D.



# Tenn. Code Ann. § 49-1-229

## **Overview**

Tenn. Code Ann. § 49-1-229, which took effect in 2016, sets forth requirements for LEAs regarding the identification and service of students with characteristics of dyslexia through dyslexia-specific interventions and details out processes for screening students with survey-level, drill-down assessments who flag for risk on the universal reading screener. Screening for characteristics of dyslexia is to take place as part of the universal screening process through existing RTI<sup>2</sup> procedures or other available means. Every LEA must screen for dyslexia and dyslexia screening procedures should include phonological and phonemic awareness, alphabet knowledge, sound symbol recognition, decoding skills, rapid automatized naming, and encoding skills.

If a dyslexia screener indicates that a child has characteristics of dyslexia, then the LEA must

- Notify the student's parent or legal guardian;
- Provide the student's parent or legal guardian with information and resource material regarding dyslexia;
- Provide the student with appropriate tiered dyslexia-specific intervention through its RTI<sup>2</sup> framework; and
- Monitor the student's progress using a tool designed to measure the effectiveness of the intervention.

See [Tenn. Code Ann. § 49-1-229](#).

# The Tennessee Literacy Success Act

## **Overview**

The Tennessee Literacy Success Act (TLSA) took effect in 2021 with the goal of improving Tennessee literacy through appropriate screening, early identification, high-quality instruction, targeted intervention, and aligned assessments of student progress, performance, and achievement. The TLSA mandates practices for LEAs to perform for student in kindergarten through grade 3, including universal reading screener tools and data reporting. See [Tenn. Code Ann. § 49-1-905](#).

The TLSA supports the screening and identification of kindergarten through grade 3 students at risk for a significant reading deficiency and for students who have a significant reading deficiency. The State Board of Education defines a "significant reading deficiency" as a student who scores at or below the 15<sup>th</sup> percentile on one of the state-board approved universal reading screeners. See [State Board of Education Rule 0520-01-](#)

[03-15\(1\)\(c\)](#). For grades 4 and 5, a student would be determined to have a significant reading deficiency if the student scores below proficient on the most recently administered English Language Arts (ELA) TCAP assessment. The State Board of Education defines being “at risk for significant reading deficiency” as a student scoring between the 16<sup>th</sup> and the 40<sup>th</sup> percentiles on a nationally normed universal reading screener. See [State Board of Education Rule 0520-01-03-.15\(1\)\(d\)](#).

To ensure the literacy development and reading success of Tennessee students, the TLSA requires all LEAs to implement foundational literacy instruction in K-3 utilizing high-quality instructional materials for all learners. In addition, the law requires that all students identified as having a significant reading deficiency receive targeted interventions through the RTI<sup>2</sup> framework. See [Tenn. Code Ann. § 49-1-905](#).

Immediately upon determining that a student in kindergarten through grade 3 has a significant reading deficiency, based on the results of the universal reading screener most recently administered to the student, the LEA or public charter school shall notify the student's parent in writing that the student has been identified to have a significant reading deficiency, and shall provide the student's parent with:

- Information about the importance of a student being able to read proficiently at the end of the third-grade level;
- Reading intervention activities that the parent may use with the parent's student at home to improve reading proficiency;
- Information about the specific reading interventions and supports that the LEA or public charter school recommends for the student, which may include the interventions provided by the LEA or public charter school pursuant to Tennessee's RTI<sup>2</sup> framework manual; and
- Information about mandatory retention under § 49-6-3115(a)(1) for students in grade three (3) with an achievement level of “approaching” or “below” on the ELA portion of the student's most recent TCAP test.

See [Tenn. Code Ann. § 49-1-905\(d\)](#). Home Literacy Reports are required for all students identified with a significant reading deficiency (15<sup>th</sup> percentile and below) and recommended for those at-risk (between the 16<sup>th</sup> and the 40<sup>th</sup> percentile). See [Tenn. Code Ann. § 49-1-905\(e\)](#). [The Foundational Literacy Skills Toolkit](#) contains more information on district requirements of Tennessee Literacy Success Act.

Home Literacy Reports should include

- Information about the importance of a student being able to read proficiently at the end of the third-grade level;

- Reading intervention activities that the parent may use with their student at home to improve reading proficiency; and
- Information about the specific reading interventions and supports that the LEA or public charter school recommends for the student, which may include the interventions provided by the LEA or public charter school pursuant to Tennessee’s RTI<sup>2</sup> framework manual.

For students identified as needing dyslexia-specific intervention due to skill deficits in areas associated with characteristics of dyslexia, Home Literacy Reports must also include information and resources related to dyslexia.

## ***Summary***

Both Tenn. Code Ann. § 49-1-229 and the Tennessee Literacy Success Act and accompanying [Tennessee State Board of Education Rule Chapter 0520-01-03](#) require LEAs to screen students in reading and to identify students at risk for foundational literacy deficits. Additionally, both laws require LEAs to make data-based decisions for student placement within tiered support in the RTI<sup>2</sup> framework, to notify parents, and to monitor progress.

The implementation of Tennessee Investment in Student Achievement (TISA) provides a unique learning need’s category of “characteristics of dyslexia” that can secure funding for students who meet criteria under [Tennessee State Board Rule Chapter 0520-12-05](#). How TISA fits in to the existing requirements surrounding literacy screening and intervention is discussed in detail in the next section.

# **Tennessee Investment in Student Achievement (TISA)**

## ***TISA Overview***

The Tennessee Investment in Student Achievement (TISA) funding formula provides additional funding weights for students with unique learning needs. This section of the Dyslexia Resource Guide will detail out the process for identifying students with characteristics of dyslexia, creating and implementing an ILP-D, providing dyslexia-specific interventions, selecting and provisioning appropriate classroom-level supports, and communicating effectively with families. The TISA portion of this guide contains six subsections:

1. Overview
2. Identification
3. Individualized Learning Plans for characteristics of dyslexia (ILP-D)
4. Guidance
5. Implementation Support

## 6. Family Supports

Appendices at the end of the guide house resources, additional information from the previous edition of the Dyslexia Resource Guide, and links to related content.

# Section I: Overview

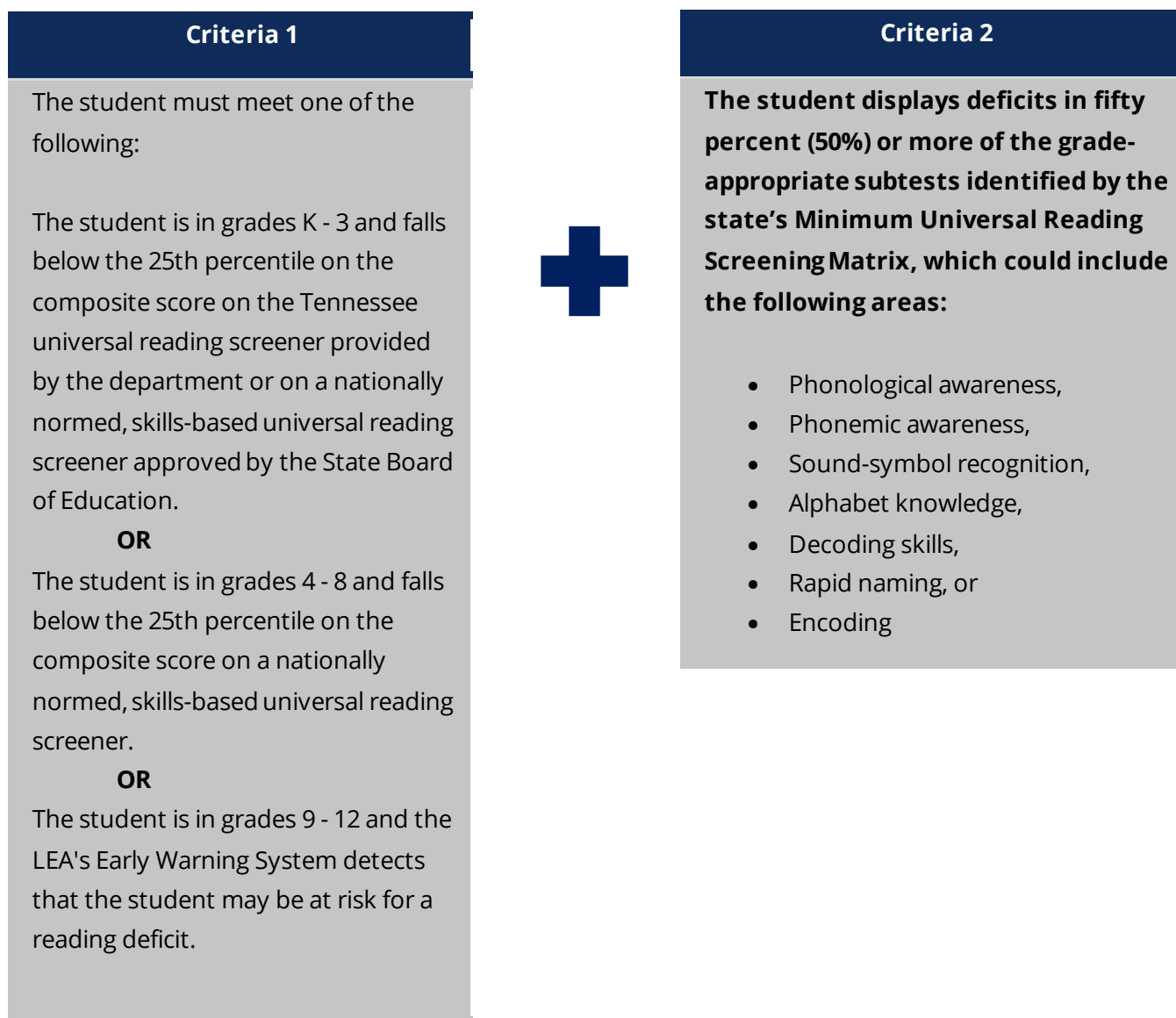
The Dyslexia Resource Guide update creates a consistent statewide model for identifying and supporting students with characteristics of dyslexia under the TISA unique learning needs (ULN). Per TISA, students with unique learning needs include students with disabilities (SWD), students with characteristics of dyslexia, and English learners (EL). Students may qualify for more than one category under unique learning needs, with some exceptions.

This guide will ensure that districts and public charter schools have a clear understanding of the concept of “characteristics of dyslexia” and can distinguish this concept from a special education eligibility determination for a specific learning disability. In addition, the guide will outline the components of an ILP-D, research-based support for struggling readers, including those that may be ELs or SWDs, and resources for family support.

## ***Characteristics of Dyslexia***

“Characteristics of dyslexia” is a defined term in [Chapter 0520-12-05 of the Department of Education Rules](#) that covers a student’s struggle with foundational reading skills, such as phonological and phonemic awareness, sound-symbol recognition, alphabet knowledge, decoding, encoding, and rapid automatized naming. Tennessee has created a category of learners under students with unique learning needs who have characteristics of dyslexia to provide funding and additional academic considerations to support student success. Students must meet criteria outlined below to be identified as a student with characteristics of dyslexia, as well as receive a finalized individual learning plan for characteristics of dyslexia, or an Individualized Learning Plan - Dyslexia (ILP-D).

Students who meet both of the above criteria must have a finalized ILP-D to be classified as a student with characteristics of dyslexia (discussed in detail later in this guide). Students with characteristics of dyslexia under TISA are served in the general education setting through the existing RTI<sup>2</sup> framework.



## ***Specific Learning Disability in Basic Reading***

In contrast, dyslexia “is a specific learning disability . . . that is neurobiological in origin. It is characterized by difficulties with accurate and/or fluent word recognition and by poor spelling and decoding abilities. These difficulties typically result from a deficit in the phonological component of language that is often unexpected in relation to other cognitive abilities and the provision of effective classroom instruction. Secondary consequences may include problems in reading comprehension and reduced reading experience that can impede growth of vocabulary and background knowledge.” [International Dyslexia Association, 2002](#); see also [Department of Education Rule 0520-12-05-.02\(14\)](#).

Students with dyslexia **may** be eligible for special education and related services under IDEA and state special education law and served through an IEP. When eligible for special education and related services,

students with dyslexia fall under the disability category of specific learning disability. To be eligible under IDEA and state special education law, students must meet two prongs. First, the student must meet the [Tennessee State Board of Education Standards for Evaluation and Eligibility for Specific Learning Disability](#), and second, the disability in question must have an adverse educational impact that cannot be addressed through normal classroom-level support, instructional scaffolds, and other reasonable considerations. In other words, some students with identified dyslexia may require an IEP, and some may not. Additional information about dyslexia and some common myths surrounding the disability are available later in this guide (see Appendix A). For information about dyslexia and special education, including parent referrals, outside evaluations, and school-based assessments for special education, see “Special Education and Section 504” later in this guide.

### ***Other Disabilities under IDEA***

Some students may have an IEP for one or more disabilities that are not related to reading. For example, a student may have an orthopedic impairment (OI) or multiple disabilities (MD) for which the IEP provides services and support related explicitly to those needs. These students may also meet the criteria for characteristics of dyslexia as outlined above. In such cases, a student may have an IEP **AND** an ILP-D. Some other eligibility categories may include speech impairment (SI), language impairment (LI), and other health impairment (OHI).

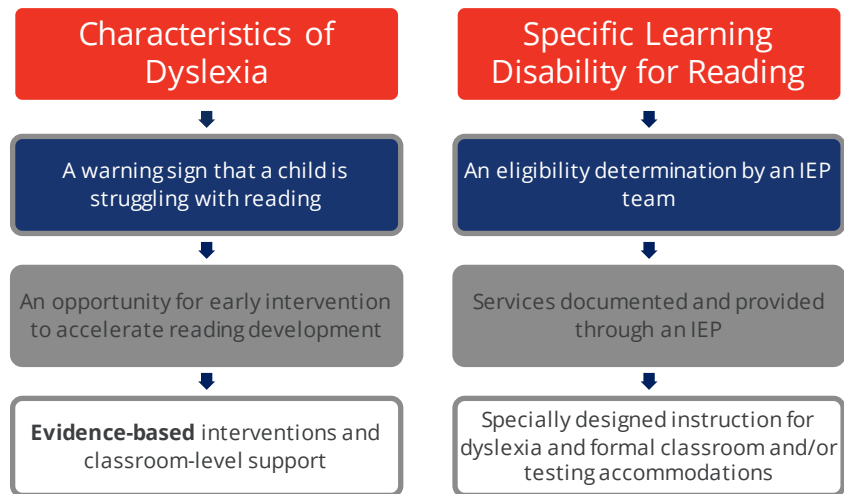
However, if a student with a disability’s IEP addresses reading as a primary or secondary disability category, the student is not eligible for an ILP-D and will instead be served solely through an IEP. Additionally, if a student’s IEP identifies reading as an exceptional area, or deficit, under present levels of performance, and the student is receiving support or services for reading through an IEP, the student would not require an ILP-D to meet the child’s needs.

Therefore, to summarize, according to [Chapter 0520-12-05 of the Department of Education Rules](#), a student would **not** meet criteria for an ILP-D if:

- the student with an ILP-D is subsequently determined eligible for special education and related services to support deficiencies in the area(s) of basic reading, reading fluency, or reading comprehension; or
- the student has a primary or secondary eligibility category on the student’s finalized IEP to support deficiencies in the area(s) of basic reading, reading fluency, or reading comprehension.

In simple terms, if a student is being served for reading through an existing IEP, the student would not require or be eligible for an ILP-D and associated funding under TISA.

# Characteristics of Dyslexia under TISA vs. Specific Learning Disability under IDEA



## 504s

Section 504 of the Rehabilitation Act of 1973 (Section 504) is a broad civil rights law that prohibits discrimination based on disability in programs and activities that receive federal financial assistance. Title II of the Americans with Disabilities Act of 1990 (Title II) also prohibits discrimination based on disability in public entities. Section 504 guarantees that a child with a disability has access to an education comparable to the education provided to a nondisabled child. For some children, this may require the development of a 504 plan. 504 plans are not one of the categories of unique learning needs under TISA. **However, a student with a 504 plan who meets the criteria for having characteristics of dyslexia under the TISA rule may also receive an ILP-D and receive the weighted allocation ULN 2 funding.**

## English Learners

An English Learner (EL) is a non-English language background (NELB) student who qualifies for English as a Second Language (ESL) services through a Tennessee Department of Education-approved English Language Proficiency screener. See [State Board of Education Rule 0520-01-22-.01\(4\)](#). ELs in TN will have an Individualized Learning Plan (ILP), which is a document developed pursuant to [Chapter 0520-01-19 of the State Board of Education Rules](#) that prescribes the academic goals, supports, and/or accommodations that an EL student needs to access classroom instruction and to improve English language proficiency.

In addition to ELs having an ILP, LEAs shall ensure that EL students suspected of having characteristics of dyslexia are screened and served in accordance with Tenn. Code Ann. § 49-1-229 and Chapter 0520-01-22 of the State Board of Education Rules. See [State Board of Education Rule 0520-01-22-.02\(g\)](#). When conducting



screenings for characteristics of dyslexia, LEAs shall consider the English language proficiency of EL students in determining the appropriate assessments and other evaluation materials to be used. EL students shall not be identified as having characteristics of dyslexia solely because of their limited English language proficiency. In addition to a developed ILP, an LEA shall provide to an EL student identified as having characteristics of dyslexia an Individualized Learning Plan - Dyslexia (ILP-D). The EL's ILP and ILP-D shall be coordinated to ensure the seamless provision of coherent and complete services and support. For more information on developing ILPs for ELs grade K-12 and ILPs for Transitional students Year 1 and Year 2, please see the *ILP Instructional Decision-Making Guide K – 12*.

## Summary

Students struggle with reading for a variety of factors, but the most common reading struggles stem from inability to access the text on the page due to foundational reading deficits. Students who struggle with basic reading skills, such as those related to the sounds of language (phonological and phonemic awareness), the relationship between speech and print (sound-symbol correspondence and alphabet knowledge), and the accurate identification and reading of words (decoding) and spelling words (encoding), are at risk of not becoming proficient readers and writers. Through streamlined communication and screening procedures, as well as uniform identification standards, districts can appropriately identify struggling readers with characteristics of dyslexia and serve them through targeted interventions in a timely manner. Understanding what the category of “characteristics of dyslexia” is and is not can help districts best serve students with this reading profile.

Continued access to grade-level standards and high-quality instructional materials (HQIM) is crucial to continued language and vocabulary development, as well as the literacy reasoning skills necessary to support comprehension of rigorous text, the critical analysis of concepts and ideas, and the development of proficient readers and thinkers. In addition to HQIM, to ensure access to high-quality literacy instruction, educators should use access points (embedded suggestions in the curriculum), and instructional scaffolds (temporary supports) to bridge a student to the learning. The integration of high-quality Tier I instruction and appropriate interventions is essential to ensure that skill deficit gaps are closed, and grade-level learning is accelerated.

## Section II: Identification

The process for identifying students as having the unique learning need of characteristics of dyslexia is defined under the Rules implementing TISA. See [Chapter 0520-12-05 of the Department of Education Rules](#). “Characteristics of dyslexia” is defined in rule as “reading challenges that are identified when a student is: (a) Identified by the composite score of the universal reading screener and/or the Early Warning System (in grades 9-12 only); **and** (b) Demonstrates deficiencies in fifty percent (50%) or more of the grade appropriate subtests of skills which support the goal of reading proficiently as identified by the Department’s Minimum Universal Reading Screening Matrix.” See [Department of Education Rule 0520-12-05-.02\(7\)](#).

This section will detail the two-step analysis for data-based decision making in relation to the identification of students with characteristics of dyslexia in grades K – 3, grades 4 – 8, and grades 9 – 12. Timely identification and early intervention are key in addressing foundational deficits and accelerating literacy skills. This guide should serve as a tool for making data-based decisions on the identification of students with characteristics of dyslexia who would then require an ILP-D, but it is not an exhaustive guide for identifying students in need of intervention support in general. District RTI<sup>2</sup> data teams should continue developing and expanding their practices in the analysis of student data and the alignment of targeted intervention supports and acceleration strategies for all students. See the department's RTI<sup>2</sup> Manual for specific and current guidance on best practices and requirements for districts in the implementation of RTI<sup>2</sup> frameworks.

*Timely identification and early intervention are key in addressing foundational deficits and accelerating literacy skills.*

## **General Identification Criteria**

Per the rules implementing TISA, a student has characteristics of dyslexia if the student meets both of the following requirements.

First, the student must be:

- In the grades K – 3 and fall below the 25th percentile on the composite score on the Tennessee universal reading screener provided by the Department or on a nationally normed, skills-based universal reading screener approved by the State Board;
- In grades 4 – 8 and fall below the 25th percentile on the composite score on a nationally normed, skills based universal reading screener; **or**
- In grades 9 – 12 and the LEA's Early Warning System (EWS) and/or universal reading screener detects that the student may be at-risk for a reading deficit.

Second, the student must additionally display deficits in fifty percent (50%) or more of the grade-appropriate subtests identified by the state's Minimum Universal Reading Screening Matrix, which could include the areas of phonological awareness, phonemic awareness, sound symbol recognition, alphabet knowledge, decoding skills, rapid naming, or encoding skills. Guidance on how to determine these deficits is discussed later in this section, and links to URS Decision-making Crosswalks for each state-approved URS are available.

A student generates a weighted TISA funding allocation aligned to ULN 2 for characteristics of dyslexia if the student meets the criteria above AND the student meets both of the following:

1. The student has a finalized ILP-D in accordance with Tenn. Code Ann. § 49-1-229 and [Chapter 0520-12-05 of the Department of Education Rules](#), **AND**
2. The parent and teacher (or team) agree the student demonstrates characteristics of dyslexia as described in the Dyslexia Resource Guide.

This guide will detail the data-based decision-making process for determining student eligibility for an ILP-D and the corresponding weighted funding by looking at the two-part analysis of universal reading screener (URS) data required to determine categorization.

## The Minimum Universal Reading Screening Matrix

The minimum matrices for all grades detail the assessments required by districts to be administered during each tri-annual window. Some measures are not required during each window and F, W, and S are used to indicate Fall, Winter, and Spring requirements. Each matrix includes all seven state-board approved screeners and the grade(s) listed at the top. Districts should utilize these documents to ensure that they are administering ALL required subtests for each grade during each screening window. Below is a snapshot illustrating the components of the minimum matrix described above.

Minimum URS Matrix							KINDERGARTEN
Reading Measure	aimswebPlus	i-Ready Suite	DIBELS 8th Edition	easyCBM	MAP Suite	Star Assessment Suite	FastBridge Suite/FAST
<b>Basic Reading Skills:</b> The ability to identify and manipulate individual sounds in language, identify printed letters and their associated sounds, and decode written language.  Basic reading skills relate to the foundational skills of phonological and phonemic awareness, sound-symbol correspondence,	Initial Sounds (F)	i-Ready Diagnostic Phonics and Phonological Awareness Domains (F, W, S)	Letter Naming Fluency (F, W, S)	Letter Name (F)	MAP Growth Reading K-2 Outcome: Overall RIT Score (F, W, S)	Star Early Literacy: Phonics and Phonological Awareness Domain (F, W, S)	earlyReading Concepts of Print (F)
	Letter Naming Fluency (F, W, S)		Phonemic Segmentation (F, W, S)	Letter Sounds (F, W, S)			earlyReading Letter Name (F)
	Letter Word Sound Fluency (F, W, S)		Nonsense Word Fluency (F, W, S)	Phoneme Segmenting (F, W, S)			earlyReading Onset Sounds (F, W)
	Phoneme Segmentation (W, S)						earlyReading Letter Sounds (F, W, S)
							earlyReading Word Segmenting (W, S)
							earlyReading

## Grade-Appropriate Skills

Seven skills have been identified in which students with characteristics of dyslexia typically exhibit deficits. Screeners at different grades assess different skills based on the expectations of that developmental age. Therefore, while students in any grade may have deficits in any of these areas, not all skills are screened for at all grades. Below, the seven skills are defined and explained. Additionally, the grades for which they are determined appropriate and, therefore, included in the second step of analysis are stated. Each URS has a Decision-Making Data Crosswalk to aid districts in determining if students have exhibited a deficit in 50% or more of the grade-appropriate subtests of skills for target grade(s). URS norm students against similarly

aged peers. Students with characteristics of dyslexia are often performing below grade level on skill sets related to foundational reading.

### **Phonological Awareness (Kindergarten and Grade 1)**

Phonological awareness is a broad category comprising a range of understandings related to the sounds of words and word parts. For example, individuals with phonological awareness understand the concept of rhyme, can count the words in a sentence, and can break words into syllables.

### **Phonemic Awareness (Kindergarten and Grade 1)**

Phonemic awareness is the ability to notice, think about, and work with the individual sounds in spoken words. A phoneme is the smallest unit of speech. Students with developed phonemic awareness, depending on age, can isolate beginning, medial, and final sounds in words, can segment words into their individual phonemes, and can isolate and manipulate sounds in words to create new words. Phonemic awareness is expected to be fully developed by the age of 10 (Moats & Tolman, 2009).

### **Alphabet Knowledge (Kindergarten and Grade 1)**

Alphabet knowledge is the understanding that letters represent sounds, which form words. Alphabet knowledge encompasses basic print awareness, letter identification, and alphabet sequence as well.

### **Sound-symbol Recognition (Kindergarten through Grade 12)**

Sound-symbol recognition is the understanding that there is a predictable relationship between phonemes (sounds in spoken language) and graphemes (the letters that represent those sounds). Sound-symbol recognition begins with 1:1 correspondence and grows to include phonics patterns of multiple letters.

***Note, beyond Grade 1, this is evaluated by the accuracy percentage demonstrated on oral or passage reading fluency measures listed on the Minimum Matrix. See the URS Decision-making Crosswalk for specific vendor details.***

### **Decoding Skills (Kindergarten through Grade 12)**

Decoding skills is a set of skills that involves using knowledge of letters and sounds to recognize and analyze printed words to make connections to the spoken words they represent. This also can be referred to as

word attack skills. Not all words are decodable but almost all words include at least some decodable features that can aid students in deciphering unknown and unfamiliar words.

***Note, beyond Grade 1, this deficit is evaluated by looking at both the risk criteria (percentile, domain cut score, et cetera) and accuracy on oral or passage reading fluency measures listed on the Minimum Matrix. Accuracy deficit is defined as reading with less than 90% accuracy. See the URS Decision-making Crosswalks for specific vendor details.***

## **Encoding Skills (Grade 1 through Grade 12)**

Encoding skills, or spelling, is the translation of speech into writing. To spell a word, students must have foundational phonological and phonemic skills, as well as alphabet knowledge and the necessary sound-symbol correspondence knowledge for the target word. Strong orthographic representations support the act of spelling.

## **Rapid Automatic Naming (RAN) (Kindergarten and Grade 1)**

Rapid naming is the ability to connect visual and verbal information by giving the appropriate names to common objects, colors, letters, and digits (quickly naming what is seen). Reading requires the retrieval of phonological information related to phonemes (letter/letter combination sounds), segments of words, and words from long-term memory in an efficient manner. RAN is a performance task that relates to processing, and deficits in RAN can be predictive of the development of such reading skills as reading fluency and automatic word recognition. Rapid naming can support the decoding and encoding of words, the reading of sight words, and the fluent, automatic reading of connected text. Unlike the above skills, RAN is not a “skill” that can be intervened upon through direct instruction. However, other areas affected by RAN can be (e.g., reading fluency, word identification and decoding).

## ***RAN and Encoding Guidance***

### **Rapid Automatic Naming (RAN)**

Not all universal reading screeners approved by the State Board include a RAN measure. RAN is grade-appropriate in kindergarten and first grade and an important indicator of processing necessary for fluency and automatic word reading. If the district’s selected measure does not include a RAN assessment, districts should roster their kindergarten and first grade students in the TN URS (aimswebPlus) for free and administer the RAN measure.

For screeners that use letter identification as a RAN measure, interpret with caution. RAN should only be tested with mastered content. If a student has not mastered letter names, performance on a RAN measure using letters will not be a true indicator of RAN. If districts have concerns for particular students, it is

encouraged to administer a separate RAN measure with objects or colors before analyzing this subtest for a deficit. In the spring, some screeners have a letter naming fluency subtest for kindergarten. If a student is above the cut-off criteria on this subtest, they can consider that for RAN and conclude that RAN is not a deficit. If the student is below the cut-off criteria, it is suggested that districts then administer the state-approved RAN measure if their screener does not include one to determine deficit in this skill area.

For screeners that only require the administration of RAN 1x per year or in the fall, districts are encouraged to consider the administration of RAN in the winter and spring to students who did not previously flag for characteristics of dyslexia but who score below the 25<sup>th</sup> percentile on the composite score in later testing window.

## Encoding

Not all approved URS include an encoding measure. Encoding has been determined to be a grade-appropriate skill for grades 1 through 12. Refer to grade-specific guidance below for needed information. The state-approved encoding measure for grades 1 – 3 is the TN-URS Spelling subtest. **If districts have an encoding measure, they currently use for grades 4 – 12, they can include detailed justification for their chosen spelling measure, including scoring criteria, in their ILP-D oversight plans, discussed later in this guide.**

## Kindergarten through Grade 12

### Kindergarten

For kindergarten students, all districts must administer the measures listed on the Minimum URS Matrix in the Fall, Winter, and Spring. Please note some measures are only administered during certain screening periods. In kindergarten, grade-appropriate subtests of skills relate to phonological and phonemic awareness, sound symbol recognition, alphabet knowledge, decoding skills, and rapid naming. *Due to the developmental state of emergent reading skills, encoding has been determined to not be a grade-appropriate skill for this grade.* See notes on RAN above for administration guidance and see URS Decision-making Crosswalk sheets for detailed rubrics for each approved URS.

### Grade 1

For grade 1 students, all districts must administer the measures listed on the Minimum URS Matrix in the Fall, Winter, and Spring. Please note some measures are only administered during certain screening periods. In grade 1, all seven skills identified as related to foundational literacy and characteristics of dyslexia are determined to be grade appropriate. All grade 1 student URS data will be analyzed for deficits in phonological awareness, phonemic awareness, sound symbol recognition, alphabet knowledge, decoding

skills, rapid naming, and encoding. See notes on RAN and encoding above for administration guidance and see URS Decision-making Crosswalk tool for detailed rubrics for each approved URS.

For grade 1 students, if a district's adopted URS does not include an encoding measure, districts must roster their students in TN-URS and administer the Spelling subtest. This is free for all K – 3 districts regardless of what URS they have adopted.

## **Grades 2 – 3**

For grade 2 and 3 students, all districts must administer the measures listed on the Minimum URS Matrix in the Fall, Winter, and Spring. Please note, some measures are only administered during certain screening periods. In grades 2 and 3, the grade-appropriate subtests included on the Minimum URS Matrix provide information on the skill areas of sound-symbol correspondence, decoding, and encoding. All grade 2 and 3 student URS data will be analyzed for deficits in these areas. See notes on encoding above for administration guidance and see URS Decision-making Crosswalk for detailed rubrics for each approved URS. Guidance on which subtests relate to which skills is explicitly detailed for districts on the URS Decision-making Crosswalks.

For grade 2 – 3 students, if a district's adopted URS does not include an encoding measure, districts must roster their students in TN-URS and administer the Spelling subtest. This is free for all K – 3 districts regardless of what URS they have adopted.

## **Grade 4**

For grade 4 students, all districts must administer the measures listed on the Minimum URS Matrix in the Fall, Winter, and Spring. Please note some measures are only administered during certain screening periods. In grade 4, the grade-appropriate subtests provide information on foundational literacy skills, primarily in the areas of decoding and encoding. See notes on encoding above for administration guidance and see URS Decision-making Crosswalks for detailed rubrics for each approved URS. Guidance on which subtests relate to which skills areas is explicitly detailed for districts on the URS Decision-making Crosswalks.

## **Grades 5 – 8**

For students in grades 5 – 8, all districts must administer the measures listed on the Minimum URS Matrix in the Fall, Winter, and Spring. Please note some measures are only administered during certain screening periods. In grades 5 – 8, the grade-appropriate subtests provide information on foundational literacy skills, primarily in the areas of decoding and encoding. See notes on encoding above for administration guidance and see URS Decision-making Crosswalks for detailed rubrics for each approved URS. Guidance on which subtests relate to which skills areas is explicitly detailed for districts on the URS Decision-making Crosswalks.



## Grades 9 - 12

For students in grades 9 – 12, the Early Warning System indicates risk. As it is functioning as the equivalence of the URS for earlier grades, all districts must administer the measures listed on the Minimum URS Matrix in the windows indicated **only for those students whose EWS indicates risk of academic reading failure**. Please note some measures are only administered during certain screening periods. In grades 9 – 12, the grade-appropriate subtests provide information on foundational literacy skills, primarily in the areas of decoding and encoding. See notes on encoding above for administration guidance and see URS Decision-making Crosswalks for detailed rubrics for each approved URS. Guidance on which subtests relate to which skills areas is explicitly detailed for districts on the URS Decision-making Crosswalks.

### *Summary*

A student may be identified as a student with the unique learning need of characteristics of dyslexia through the universal reading screener process and subsequent analysis of data. URS Decision-making Crosswalks for each approved screener at each grade/band are available to aid districts in accurately analyzing and interpreting student performance after taking all assessments listed on the corresponding Minimum Matrix.

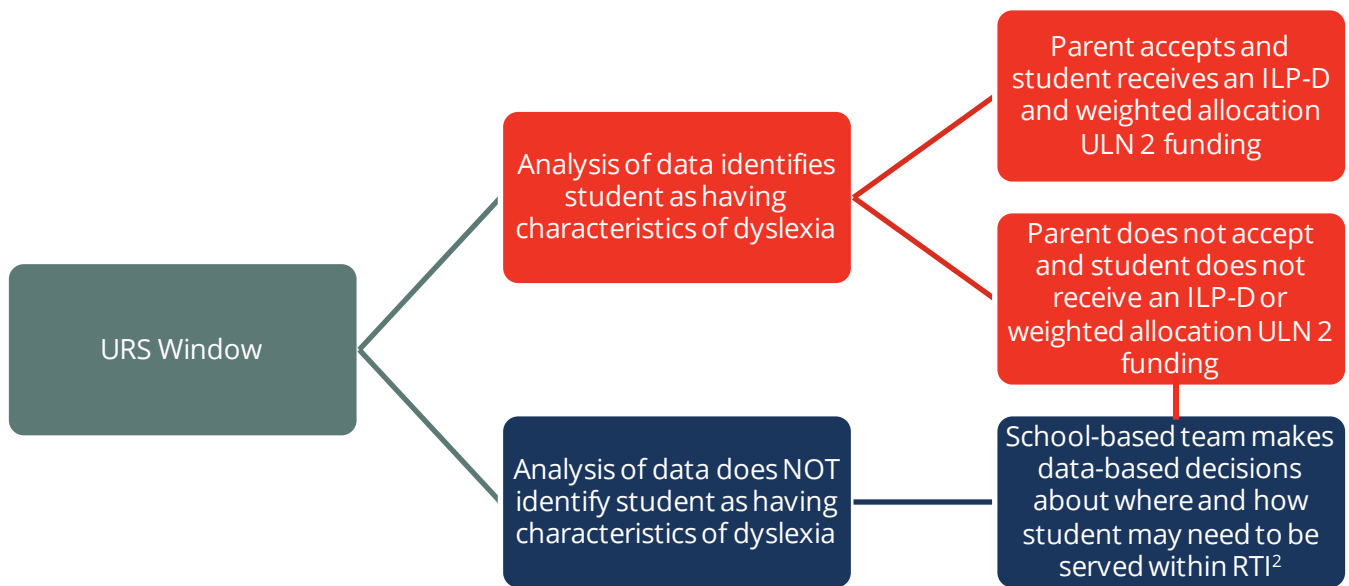
## Section III: Plans

Once students have taken the assessments listed on the Minimum Matrix and have met initial criteria under TISA for characteristics of dyslexia through analysis of their data, students are eligible for an individual learning plan for characteristics of dyslexia, or an ILP-D.

Assuming the student does not meet any of the previously mentioned criteria related to special education eligibility or direct services (refer to Section I: Overview for more detail), the student would receive an ILP-D if the parent accepts the ILP-D and agrees with the educator team that the student exhibits characteristics of dyslexia. The provision of an ILP-D following agreement by the parent and educator team secures the weighted allocation funding ULN 2.

**Students who do not qualify as having characteristics of dyslexia under TISA may still have deficits that warrant service through RTI<sup>2</sup> tiered intervention for math, reading, or written expression.**

**Students who do not meet criteria for TISA or whose parents decline an ILP-D are still protected by the 2016 Dyslexia Law and the Tennessee Literacy Success Act. If a student flags for risk on dyslexia screeners or drill-down assessments and/or meets criteria for a significant reading deficiency or risk for a significant reading deficiency, LEAs must still comply with Tenn. Code Ann. § 49-1-229 and TLSA to place and serve students within the RTI<sup>2</sup> framework. Districts should still make data-based decisions using multiple sources of data to place students appropriately and to meet individual student literacy needs. Any requirements in regard to parent notification, progress monitoring, and interventions remain.**



## ***ILP-D Overview***

The ILP-D is a version of an intervention plan for students who qualify for the TISA weighted allocation ULN 2 for characteristics of dyslexia. Students who qualify as having characteristics of dyslexia as outlined in Section II: Identification of this guide are eligible for an ILP-D and ULN 2 funding. Parent(s)/guardian(s) must agree for their child to be served through an ILP-D. The ILP-D is designed to document:

1. student universal reading screener data,
2. parent notification and agreement to the provision of an ILP-D,
3. grade-appropriate deficit areas identified through the universal reading screener process,
4. targeted skills for intervention,
5. current interventions and intervention history,
6. classroom access through support and accommodations, including assistive technology (grades 4–12),
7. team members, and
8. exit criteria.

Additionally, districts must adopt and implement an oversight plan that outlines the development, implementation, and monitoring of ILP-Ds for students with characteristics of dyslexia in accordance with this rule, State Board of Education Rule Chapter 0520-01-22-.02, and the Tennessee Investment in Student Achievement (TISA) Guide. See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(5\)](#). This oversight plan must address:

- the development of ILP-Ds for all students with characteristics of dyslexia in the LEA or public charter school;
- the monitoring of student progress on ILP-Ds quarterly;
- annual review and revision of ILP-Ds;
- communication with parents and/or legal guardians and notification regarding ILP-Ds;
- the special education referral process and how the LEA will ensure RTI<sup>2</sup> is not used to delay or deny special education evaluations;
- the seamless coordination of services and supports for students with characteristics of dyslexia who are also ELs and/or students with disabilities;
- identification of school-based staff who are responsible for developing and implementing ILP-Ds;
- training for appropriate staff regarding ILP-D requirements, development, and implementation; and
- the sufficient staffing and resources required to support the development and implementation of all ILP-Ds across the LEA or public charter school.

ILP-Ds will be developed and housed within the statewide TN PULSE data platform. Implementation of plans through TN PULSE is discussed in Section VI of this guide. When plans are written the system will default the plan to a 365-day term. ILP-Ds must be reviewed and revised annually to determine continued eligibility for support through an ILP-D and continued eligibility for TISA ULN 2 funding. See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(3\)](#). Exit criteria considerations are discussed later in this section.

## ***ILP-D Sections***

All components of the ILP-D function together to serve struggling readers within both intervention and the general classroom.

### **Data**

Most recent and historical composite percentile scores will be included in the ILP-D data section. In this area, those responsible for the plan will be asked to confirm that the student both 1) flags below the 25th percentile on the composite URS score (and/or flags for risk on the EWS in grades 9-12 only) and 2) exhibits a deficit in 50% or more of the grade appropriate subtests of skills on the Minimum URS Matrix. Districts will utilize the URS Decision-making Crosswalks for their vendor to ensure they are correctly analyzing URS data to determine which students meet criteria for having characteristics of dyslexia.

### **Parent Agreement**

Parents must be notified if their student meets criteria for characteristics of dyslexia and qualifies for an ILP-D (letter template is available in Appendix F). Parents **must** be given the option to decline an ILP-D for their child. If a parent declines, the student does not receive an ILP-D. ***The declining of an ILP-D, however, does not constitute a waiver of RTI<sup>2</sup> services. The student will continue receiving intervention support as determined by school-based teams within the RTI<sup>2</sup> process and perhaps have an intervention plan.*** The student will not have an ILP-D or generate TISA ULN 2 funding if the parent declines, though.

If a parent agrees, the team will create an ILP-D through the TN PULSE data system for the student. Parents may but are not required to be included in this process, but it is best practice to involve families and document signatures of agreement on all finalized plans.

## Grade-appropriate Skills Deficits

Districts must determine if a student exhibits a deficit in 50% or more of the grade-appropriate subtests of skills for the student to be eligible for an ILP-D. School teams will indicate in which grade-appropriate areas the student exhibited deficits as determined through the URS. Revisit Section II to see which skills have been determined to be appropriate at which grades, as well as reference URS Decision-making Crosswalks for district vendor/grade.

Understand that, while students are being measured on grade-appropriate skills, they may have deficits in other foundational skills more appropriate for younger grades that could be targeted during intervention. Additional sources of data, including survey-level assessments, may be necessary to drill down to pinpoint individual student needs (discussed in more detail below). This guide provides a visual of a suggested trajectory for drilling down on literacy skills (see Appendix C).

## Targeted Skills for Intervention

Students who qualify for an ILP-D will flag with deficits on the universal reading screener on grade-appropriate subtests of skills. These skills, as mentioned earlier in this guide, are associated with characteristics of dyslexia, and gaps in these areas mean a student has gaps in foundational literacy skills. Because different skills may not be grade-appropriate for all students, students may have deficit skills discovered through additional modes of data collection. Districts may choose to do additional survey-level or criterion-referenced assessments specific to a skill, and/or they may utilize other sources of data such as classroom observation and grades, formative and summative assessments, and parent/student surveys or questionnaires.

**Most students who are struggling with foundational literacy skills may be below grade-level in the areas associated with characteristics of dyslexia.** Additionally, some skills are prerequisite for other skills and some intervention programs, materials, or methodologies may focus explicitly on certain skill areas. For this reason, students may be in more than one intervention, or the skill areas marked as being targeted in intervention may include more or fewer skills than are flagged on the universal reading screener. This being said, explicit and systematically structured literacy lessons should address all foundational skills and areas of language.

## Interventions and Intervention History

All interventions being utilized should be detailed in this section. Historical data on past interventions will remain on the plan to document if an intervention change was made and why. Interventions may change for a variety of reasons, including but not limited to:

- the intervention was not producing adequate growth and needed to be adjusted;
- the intervention was successful in addressing skill deficits and was no longer applicable, or
- the student's data changed and indicated new or different needs than originally identified.

This section of the ILP-D includes the ability to mark when intervention decisions are updated and may coincide with progress monitoring and/or the most recent universal screening window. Progress monitoring involves using assessments to gauge student performance on either skills or standards. Different types of assessments measure different targets, but the most important consideration for progress monitoring is whether the assessment is appropriately aligned to the target deficit. For example, if a student is working on decoding, or identifying, words with short vowel sounds and the intervention team utilizes a standards-based oral reading fluency measure, the information gained from that is unlikely to align and be interpretable for the skill on which the student is working without error or item-level analysis.

Districts must adopt an oversight plan that outlines the development, implementation, and monitoring of ILP-Ds. See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(5\)](#). Within the requirements of the oversight plan, districts must address the quarterly monitoring of student progress. Therefore, districts must be able to speak to how student progress on ILP-Ds is being monitored. However, progress monitoring is currently included as an optional section on the ILP-D since many districts already monitor progress through other systems and procedures or on separate intervention plans.

All decisions surrounding intervention placement and change should be data-based and supported by evidence. Guidance on how to ensure an intervention meets the criteria of being dyslexia-specific, including that it is aligned to individual student needs is available in Section IV of this document.

## Classroom Access: Supports and Accommodations

*Instructional scaffolds are temporary, student-specific support structures designed to maximize access to grade-level concepts and tasks.*

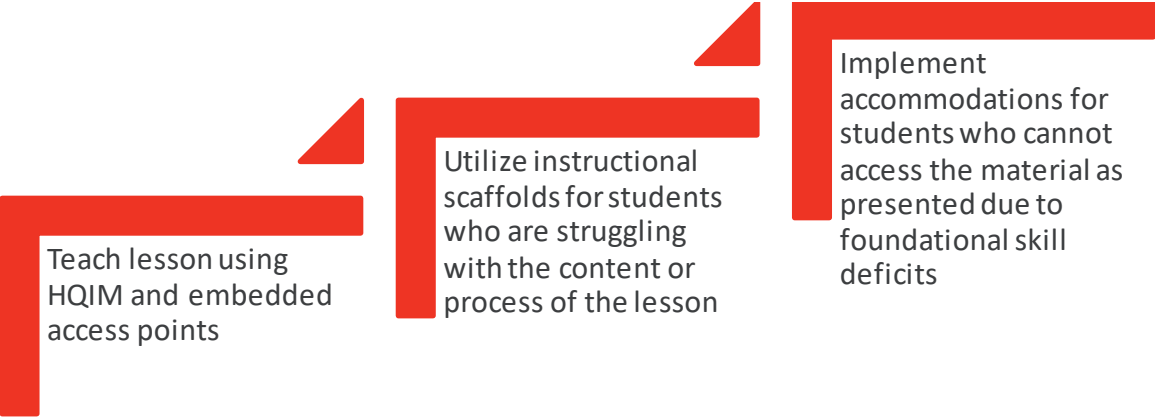
Students with characteristics of dyslexia who struggle with foundational literacy skills may require additional considerations, scaffolds, and supports within the classroom to access grade-level content and fully engage with high-quality instructional materials (HQIM). HQIMs embed access points within instructional lessons to ensure all learners can engage with them. These might be checks for understanding, purposeful questioning, or another engagement opportunity. For some students, access points are not enough, and they may require additional support to be able to engage and/or complete an assignment or task. Instructional scaffolds are

temporary, student-specific support structures designed to maximize access to grade-level concepts and tasks. Accommodations are similar to instructional scaffolds. However, instructional scaffolds should occur first, and then for students who are still struggling, additional accommodations may need to be considered. Instructional scaffolds relate more directly to the content of the lesson, while an accommodation addresses how content is presented. For example, a student may need the instructional scaffold of pre-teaching difficult vocabulary but also may need the accommodation of text-to-speech (oral/audio presentation) to access the material. **Accommodations do not and should not lower the educational standard or expectation for mastery or proficiency.** Accommodations are designed to support access, not guarantee proficiency.

Accommodations is a term used in IDEA and Section 504 as well. When the word accommodations is used in relation to support available through an ILP-D, it refers to classroom-level considerations that allow a student to engage with grade-level materials. Refer to the graphic below for suggestions on how increasing levels of support may be implemented in the classroom.

Section IV of this resource provides information on selecting and implementing specific scaffolds and accommodations. The Guidance section also distinguishes between support and accommodations available through the ILP-D for classroom use only and accommodations allowable on state testing through other student plans (i.e., ILPs, IEPs, and Section 504 plans).

*Instructional Scaffolds and Accommodations within Tier I Instruction*



**While the ILP-D does not allow for accommodations on state testing,** it does present various evidence-supported classroom-level considerations and accommodations for students with foundational literacy struggles. These include:

- oral/audio presentation of anchor and supplemental texts,
- opportunities for fluency practice with decodable (grades K-3) or appropriate texts (grades 4-12),
- multiple formats of presentation (auditory, visual, etc.) and opportunity for multi-sensory learning engagement,
- no penalty for spelling in writing tasks/opportunities to correct spelling of words with previously taught concepts,
- chunking of text and/or task, and
- pre-teaching of vocabulary and/or background knowledge.

Educators will also be able to enter custom scaffolds and accommodations specific to the student if the team determines they are appropriate and necessary.

**Assistive technology (AT) must be considered for students in grades 4-12 who have an ILP-D.** See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(2\)](#). The ILP-D presents some general AT considerations such as 1) consistent access to text-to-speech and speech-to-text capabilities, 2) use of headphones, and 3) use of microphone. Opportunities to enter custom options are also present in this section. Because research supports that AT is most successful for students with training and follow-up support, the ILP-D will ask the team to identify who is responsible for ensuring the student has appropriate support in utilizing the AT provided for the student.

The district oversight plan requires LEAs to identify the school-based staff who are responsible for designing and implementing the ILP-D. This should be kept in mind when it comes to ensuring the faithful implementation of all necessary supports within Tier I classroom instructional time.

## Team Members

As mentioned, districts are responsible for identifying school-based staff responsible for designing and implementing the ILP-D, training said staff, and ensuring sufficient staffing and resources. See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(5\)](#). Additionally, districts must have a plan for how to seamlessly coordinate the service of students with disabilities and English learners with IEPs, ILPs, or both. See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(5\)\(vi\)](#). For this reason, districts should consider the school-based team carefully through a student-focused lens. There are no mandates in TISA rule as to who should comprise the school-based teams for the creation and implementation of ILP-Ds, and teams may vary from district to district. These teams will likely reflect district school-based data teams, such as the RTI<sup>2</sup> data team, but may include additional members as determined appropriate or necessary.



## Exit Criteria

ILP-Ds default in the system for one calendar year (365 days) and must be reviewed annually. See [State Board of Education 0520-01-22-.02\(1\)\(d\)\(3\)](#). When an ILP-D is created for a student, that student's continued eligibility is based on universal reading screener data. A student whose data continues to meet both requirements to be identified as a student with characteristics of dyslexia will continue to be served with an ILP-D and have the plan revised and a new annual ILP-D will be created for the next 365 days.

The faithful provision of aligned interventions and classroom support are designed to help students close skill and learning gaps. Therefore, some students may no longer require an ILP-D or the support it offers after receiving targeted interventions and continued high-quality Tier I instruction. To be exited from an ILP-D and to discontinue the weighted allocation ULN 2 funding linked to the provision of the plan, a student must exceed the URS criteria for characteristics of dyslexia for **TWO (2) consecutive** universal reading screening windows.

This exit criteria of two consecutive performances on the URS is a recommendation for best practice which will ensure that performance is consistently improved and lowers the chances that students will move in and out of eligibility unnecessarily.

**Students who do not meet or no longer meet the criteria for having characteristics of dyslexia may still require intensive, targeted intervention.** School-based teams should consider all data when implementing, changing, or discontinuing an intervention, regardless of being eligible for funding under TISA.

Additionally, if a student subsequently becomes eligible for special education with a primary or secondary eligibility category related to basic reading or becomes eligible for special education and the IEP addresses reading through special education services, the student would also no longer be eligible for an ILP-D and be exited from the plan. See [State Board of Education Rule 0520-01-22-.02\(1\)\(f\)](#).

If a student with an active ILP-D transfers to a new school within the state, their current ILP-D will be available to the new district within the TN PULSE platform upon proper transfer of records within the system to reflect the new district of enrollment. New districts should finalize an ILP-D revision to reflect any changes that allow the ILP-D to be fulfilled by the new district. For example, District A may utilize a different intervention program or materials than District B; therefore, District B, upon student transfer, would update the intervention section of the ILP-D and finalize a revision. The ILP-D end date will remain the same as the original ILP-D end date (365 days from creation), but this updated final ILP-D will ensure that the appropriate district receives funding for the student, allowing for the provision of appropriate and necessary instruction and support.

## Summary

Individualized learning plans for students with characteristics of dyslexia, or ILP-Ds, are documents with multiple functions. The finalization of the ILP-D is the final step in securing ULN 2 funding through TISA for that student for the time for which they have an active plan finalized in TN PULSE. The contents of the document itself are designed to ensure that students are placed in appropriately aligned dyslexia-specific interventions, that educators are monitoring the effectiveness of current interventions, and that students are receiving necessary and student-specific scaffolds and accommodations during Tier I instruction.

Districts must have oversight plans for monitoring progress quarterly, ensuring the RTI<sup>2</sup> process is not denying or delaying special education referrals or eligibility, integrating services for dually or multi-identified students, such as ELs who also have an IEP or an ILP-D, and securing school-based teams who are equipped to manage the ILP-Ds in accordance with [Chapter 0520-01-22 of the State Board of Education Rules](#) for all students who qualify.

## Section IV: Guidance

Effectively creating and implementing the components of an ILP-D to ensure students with characteristics of dyslexia are receiving appropriate interventions and necessary classroom-level support is the responsibility of districts. A thoughtful and thorough implementation plan covering the required areas outlined in the previous section can help. The guidance in this section focuses directly on the following areas to aid districts in making student-centered decisions:

- Dyslexia-Specific Interventions:
  - assessing and choosing dyslexia-specific interventions that meet the criteria outlined by the department,
  - identifying deficits and appropriately aligning interventions to individual need, and
  - determining if additional survey-level assessments or other data are needed to determine student need.
- Classroom Access through Support and Accommodations:
  - selecting and implementing classroom-level support and accommodation, and
  - Understanding the difference between support and accommodations allowable through an ILP-D and those allowable through other provisioned plans, such as ILPs for EL students, IEPs for SWDs, and 504s.

### Dyslexia-specific Interventions

The majority of students require explicit and systematic instruction in literacy to learn how to read (Young, 2023) and all can benefit from it. Tennessee's use of sounds-first instruction in Tier I is aligned to the science of reading and meets the criteria for explicit and systematic curriculum. However, some students may continue to struggle even with high-quality research-based instruction and explicit, systematic lessons. These students can learn how to read but require more intensive support, higher numbers of repetitions, and more practice opportunities. Therefore, students who have been identified as having characteristics of dyslexia through the LEA's dyslexia screening procedures (in compliance with both TISA and §49-1-229) should be placed in dyslexia-specific interventions. Students identified as having characteristics of dyslexia under TISA and in accordance with [Tenn. Code Ann. § 49-1-229](#) and Chapter 0520-01-22 of the State Board of Education Rules will have an ILP-D that provides appropriate tiered dyslexia-specific interventions. Dyslexia-specific interventions must meet the following criteria:

- explicit – skills explained, directly taught, and modeled by the teacher,
- systematic and cumulative – introduces concepts in a definite, logical sequence; concepts are ordered from simple to more complex,
- multi-sensory – links listening, speaking, reading, and writing together; involves movement and “hands-on” learning,
- language-based – addresses all levels of language, including sounds (phonemes), symbols (graphemes), meaningful word parts (morphemes), word and phrase meanings (semantics), and sentence formation (syntax), and
- aligned to individual student need – should address the skill deficit(s) identified through targeted assessments.

Students who are placed in dyslexia-specific interventions have exhibited deficits in foundational reading skills, which may include phonological awareness, phonemic awareness, alphabet knowledge, sound-symbol recognition, decoding, encoding, and rapid naming. Refer to Section II for definitions of these skill areas. Struggling readers with characteristics of dyslexia may have deficits in some or all these areas, and choosing an intervention that aligns to student individual need requires that the school-based team have knowledge of the child's skills.

Districts will know the areas students with characteristics of dyslexia exhibit deficits after they analyze student data using the URS Decision-making Crosswalk for those who fall below the 25th percentile on the URS composite score. Screeners do not provide complete instructionally diagnostic information, however, and school-based teams may need to perform additional survey level assessments as well as error analysis of screener subtests to appropriately place a student in an intervention. For example, a student's URS may indicate that she has a deficit in decoding, but without additional information, the school-based team would not know where in a phonics program to place the student. Similarly, phonemic awareness skills range from simple to complex. Teams need to understand what a child can do as much as what he/she cannot to ensure targeted intervention and instruction.

For more detailed information regarding progress monitoring within RTI<sup>2</sup> intervention, please refer to the RTI<sup>2</sup> Manual.

Districts can reference the included flowchart to guide decision making around drill-down assessments and intervention placement (see Appendix C).

## Classroom Access: Support and Accommodations

High-quality instruction materials (HQIM) are designed to include access points and opportunities for teachers to embed necessary instructional scaffolds. This ensures that all learners are not just being exposed to but are accessing grade-level content and texts. The section of the ILP-Ds dedicated to classroom access lists both instructional scaffolds and accommodations that may be necessary for students with characteristics of dyslexia. The research-based supports listed on the ILP-D are intended to be purposefully selected based on individual student need. This need, as students close gaps and improve skills, may change throughout the year. If this occurs, the ILP-D can be revised to reflect updated student need. Revisit Section III for more information on instructional scaffolds and accommodations, and see chart for guidance on selecting and utilizing classroom-level support and accommodations (see Appendix D).

Assistive technology (AT) can be a great asset in providing access to grade-level content for students with foundational literacy deficits. For students in grades 4 – 12, assistive technology must be addressed on the ILP-D. See State Board of Education Rule 0520-01-22-.02(1)(d)(2). **Please note, the team does not have to indicate that assistive technology is necessary, but it must be considered.** More information on AT is available later in this resource (see Appendix E).

**Support and accommodation options available on the ILP-D are specific to the classroom. The ILP-D does not entitle students with characteristics of dyslexia to accommodations on end-of-year testing, unless they also have an ILP, IEP, or Section 504 plan which outlines such accommodations.** The intention of the classroom access options on the ILP-D is to ensure students maintain access to grade-level standards-based instruction through their district HQIM. The combination of high-quality Tier I instruction, targeted dyslexia-specific intervention, and appropriate classroom-level support helps ensure that students with characteristics of dyslexia are accessing grade-level content and meeting standards while closing their learning gaps in foundational skills. Access to grade-level content and high expectations are crucial to continued student growth.

## Summary

The URS process is used to determine if a student requires dyslexia-specific interventions and classroom-level support. However, in order to effectively intervene aligned to student need and to select appropriate access and support options, LEAs may need additional information. Other sources of data can help drive instructional decision making and decisions surrounding classroom-level support. An ILP-D includes the

provision of dyslexia-specific interventions as well as necessary support to ensure access to grade-level content and standards. An ILP-D does not, however, qualify a student for accommodations on end-of-year testing (unless they have an IEP, ILP, or Section 504 plan which outlines these). LEAs should be purposeful in selecting and implementing classroom supports and ensure that students with characteristics of dyslexia can access the grade-level content.

## Section VI: Implementation

ILP-Ds will be created, monitored, and housed within the statewide platform, TN PULSE. The platform should facilitate the coding, reporting, monitoring, and service of students with characteristics of dyslexia. In tandem with detailed district oversight plans, districts can ensure that students with characteristics of dyslexia are appropriately identified and that appropriate services are provisioned.

School-based teams identified as responsible for ILP-Ds will ensure that dyslexia-specific interventions are provided through appropriate tiered support.

Reference the TN PULSE Manual for detailed guidance on navigating the system and creating ILP-Ds.

## Section VII: Family Support

A child's educational team is not complete without family engagement. Districts have certain requirements for communication of characteristics of dyslexia, tiered support, resources, and progress monitoring. *See* Tenn. Code Ann. § 49-1-229(c). However, it is best practice to involve families as much as possible and to utilize family-friendly language and various modes of communication to ensure understanding and to provide opportunities for input and collaboration. A number of resources, including a sample letter for communication for when a student meets eligibility for characteristics of dyslexia under TISA and a link to a glossary of terms for family-friendly communications is included (see Appendix F).

## Special Education (IDEA) and Section 504

While the majority of students with deficits in foundational reading skills can be served through general education classroom support and targeted intervention within the RTI<sup>2</sup> tiers, some students with characteristics of dyslexia may have a specific learning disability in basic reading and/or reading fluency. These students may continue to struggle despite appropriate classroom supports and targeted, intense interventions.

Students with a specific learning disability in basic reading and/or reading fluency may qualify for an individualized education plan (IEP) through special education under IDEA or for a Section 504 plan. Eligibility for protections under IDEA or Section 504 involves identified need and referral, evaluation, and eligibility processes. Details on how students with dyslexia qualify for and are served through special education or Section 504 follow.

## ***Special Education and Dyslexia***

Literacy deficits should be addressed through the least restrictive environment for individual students

The term ***Specific Learning Disability*** means a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or do mathematical calculations, and that adversely affects a child's educational performance. Such term includes conditions such as perceptual disabilities (e.g., visual processing), brain injury that is not caused by an external physical force, minimal brain dysfunction, **dyslexia**, and developmental aphasia. Specific Learning Disability does not include a learning problem that is primarily the result of Visual Impairment; Hearing Impairment; Orthopedic Impairment, Intellectual Disability, Emotional Disturbance; Limited English Proficiency; or Environmental or Cultural Disadvantage. See Sec. 300.8(c)(10) of the Individuals with Disabilities Education Act (IDEA).

within a continuum of alternative placements. Schools, in collaboration with parents and families, should consider all available information to develop a plan to address the individual needs of each student. This continuum of support may include tiered interventions through RTI<sup>2</sup>, accommodations provided through Section 504 plans or IEPs, and/or special education interventions. If a student is not successful with interventions provided through general education (i.e., RTI<sup>2</sup>), the student *may* be referred for evaluation to consider eligibility for special education as this may indicate a possible specific learning disability. (Section 504 plans for dyslexia also require an evaluation and eligibility process.)

States must adopt criteria for determining whether a child has a specific learning disability. See 34 C.F.R. § 300.307(a). In Tennessee, before determining that a student is eligible for special education and related services under the specific learning disability category, LEAs must obtain data through the RTI<sup>2</sup> framework demonstrating that the student was provided “empirically research-based instruction that is rigorous and systematic throughout all Tiers of instruction/intervention.” See [Standards of the State Board of Education for Evaluation and Eligibility for Specific Learning Disability](#). Students with dyslexia must meet state eligibility criteria prior to receiving special education services through an IEP—an outside diagnosis of dyslexia alone is not sufficient for a student to receive special education. Dyslexia is typically associated with a specific learning disability in basic reading, which includes foundational skills related to decoding (i.e., phonemic awareness, letter/sound knowledge, sight word recognition, phonics, and word analysis).

Pursuant to 34 C.F.R. § 300.301(b), a parent or the LEA may refer a child for an evaluation at any time to determine if the child is a child with a disability. If a student is suspected of having an educational disability at any time, the student may be referred by the student's teacher, parent, or outside sources for an initial special education evaluation based on referral concerns. The use of RTI<sup>2</sup> strategies may not be used to delay or deny the provision of a full and individual evaluation to a child suspected of having a disability. For more information on the rights to an initial evaluation, refer to [Memorandum 11-07](#) from the U.S. Department of Education Office of Special Education and Rehabilitation Services.

A dyslexia evaluation is not required for a school to provide interventions to address characteristics of dyslexia; however, if a parent chooses to seek an evaluation (outside of the school system) for dyslexia and shares the results with the school district of the evaluation obtained at private expense, the school district must consider the results of the evaluation in any decision made with respect to the provision of a free appropriate public education (FAPE).

It is not required that the school team identify dyslexia in order to meet criteria for a specific learning disability; however, the team should consider referral concerns and determine the most appropriate assessment plan to identify student deficits and develop a plan based on a continuum of services in the least restrictive environment. **There is nothing in IDEA that prevents the usage of the term "dyslexia" in discussion about the child.** See [United States Department of Education OSERS "Dear Colleague: Dyslexia Guidance."](#) Since the state of Tennessee recognizes dyslexia under the umbrella of specific learning disability (SLD), in formal evaluation, eligibility determinations, and/or IEP documents (e.g., within basic reading present levels of performance, adverse impact statements, etc.), the student's disability may be referred to as SLD in basic reading and/or fluency.

For more information regarding characteristics of dyslexia that teams may choose to assess as part of an evaluation, refer to <https://dyslexiaida.org/testing-and-evaluation/>.

Special education interventions are considered the most intensive and are provided based on a student's eligibility and the need for specialized instruction. The student will remain in the core instruction (Tier I) and will have access to tiered intervention within the general education curriculum to the greatest extent possible. The same problem-solving approach used in the general education RTI<sup>2</sup> process will be used in special education. Furthermore, interventions will be tailored to the student in the area of the identified disability (i.e., dyslexia-specific interventions when appropriate), and progress toward their IEP goals will be monitored weekly or every other week. If students fail to respond to the provision of special education services, an IEP team meeting will be reconvened.

## ***Section 504 and Dyslexia***

As mentioned previously, Section 504 of the Rehabilitation Act of 1973 (Section 504) is a broad civil rights law that prohibits discrimination based on disability in programs and activities that receive federal financial assistance. Title II of the Americans with Disabilities Act of 1990 (Title II) also prohibits discrimination based on disability in public entities. Section 504 guarantees that a child with a disability has access to an



education comparable to the education provided to a nondisabled child. For some children, this may require the development of a 504 plan.

Under Section 504, a student with a disability may have a plan that guarantees equal access to education and allows for certain accommodations or modifications. A student may be eligible for a Section 504 plan if the student has a “physical or mental impairment” that “substantially limits one or more major life activities.” See Section 504 regulations at 34 C.F.R. 104.3(j)(1)(i). To receive a Section 504 plan, students must also be referred by a school-based team or parent and meet certain criteria for eligibility. When a student has a 504 plan for dyslexia, the 504 plan typically provides classroom-based and testing accommodations designed to support the access of grade-level content and standards.

Like IDEA, Section 504 requires a district to identify and locate every eligible student with a disability and provide FAPE to each eligible student within its jurisdiction, regardless of the nature or severity of the student’s disability. To ensure compliance with Section 504, a district should timely refer and evaluate a student with dyslexia who needs or is believed to need special education or related services. Evaluations of students with dyslexia must include a variety of sources of information, be tailored to evaluate the specific areas of educational need and be validated for the specific purpose for which they are used and appropriately administered by trained personnel.

An external “diagnosis” of dyslexia is not required before consideration of eligibility for a 504. Eligibility for a section 504 plan is based on an evaluation (see the office of civil rights [document](#) and the department section 504 guide for further information regarding 504 evaluations) and the determination that a student’s mental or physical impairment substantially limits one or more major life activity (including reading). A school evaluation can address the profile of dyslexia, and results may be sufficient to determine a possible impairment. The profile of dyslexia is considered a type of specific learning disability. Should the team consider a referral to special education, the student would need to meet the educational criteria for a specific learning disability as outlined by the Tennessee evaluation standards.

School teams should work with parents and families to consider all available information when developing plans to address the individual student's needs.

## **Summary**

For some students, an ILP-D may not provide all the support needed to be successful in the general education setting. Some students may need the support that special education or Section 504 provides. Both avenues involve an evaluation and eligibility process. Neither an ILP-D nor RTI<sup>2</sup> can be used to deny or delay a referral for an evaluation if a student is suspected of having a disability.

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[https://www.nancyyoung.ca/files/ugd/ff7f1a\\_0907efb358234fde9dc8f78c9d9f89e2.pdf](https://www.nancyyoung.ca/files/ugd/ff7f1a_0907efb358234fde9dc8f78c9d9f89e2.pdf)

## Appendix A

Taken and adapted from *Dyslexia Resource Guide* (2018 update). Information sources from IDA (2002) and IDA (2020). New content adapted from Alexander et al. (2023). See [Understanding Dyslexia: A Guide for Tennessee Families](#) for a more myths and truths.

Topic	Myth	Truth
<b>Reversals</b>	Dyslexia is a vision problem. Students with dyslexia see and write letters and words backwards.	Many children reverse their letters when learning to read and write. Reversing letters is not a sure sign of dyslexia, and not all students with dyslexia reverse letters.
<b>School Success</b>	If you perform well in school, you must not have dyslexia.	Some students with dyslexia perform well in school. These students work hard, are motivated, and have the accommodations necessary to show their knowledge.
<b>Intelligence</b>	Smart students cannot be dyslexic; students with dyslexia cannot be very smart.	Dyslexia is defined by an unexpected difficulty in learning to read. Said another way, dyslexia is a paradox—the same person who struggles to read quickly often has a very high intelligence.
<b>Reading Ability</b>	Students with dyslexia cannot learn to read.	Most students with dyslexia do learn to read, but with greater effort. They tend to remain “manual” rather than “fluent” readers, reading slowly and with great effort.
<b>Reading Difficulties</b>	All reading difficulties can be attributed to dyslexia.	The hallmark of dyslexia is an unexpected reading difficulty in a child who seems to have all the equipment (intelligence, verbal skills, motivation) necessary to become a reader. There are other ways students can struggle to read: (1) 3-10 percent of students who are strong decoders don’t understand what they are reading (specific reading comprehension deficit) <sup>1</sup> , and (2) some students struggle with both the code of the language and the meaning of the language (mixed reading deficit).

<b>Eligibility</b>	If a student has dyslexia, they will have an IEP. An IEP is the only way to get the appropriate instruction and accommodations needed.	Dyslexia comes in many degrees from mild to severe (IDA, 2020). Some children with dyslexic characteristics meet the <a href="#">Standards of the State Board of Education for Evaluation and Eligibility for Specific Learning Disability</a> and some do not. All students receive appropriate, differentiated instruction and universal accommodations in Tier I, and when needed, the student may receive Tier II or Tier III intervention. Students who do not respond to these interventions may be eligible to receive interventions through special education.
<b>Identification</b>	Schools cannot identify dyslexia.	Schools do not specifically evaluate whether students have dyslexia, but students with dyslexia may generally be eligible for special education and related services for having a specific learning disability or eligible for dyslexia-specific interventions within RTI <sup>2</sup> for displaying characteristics of dyslexia. Nothing prevents LEAs from using the term “dyslexia” in discussing a child’s learning profile.
<b>Gender</b>	Only boys are affected by dyslexia.	Students of both genders can have dyslexia. The higher number of male referrals may be due to differences in classroom behaviors.
<b>Short-term Problem</b>	Most students will eventually outgrow dyslexia.	Dyslexia is the result of a processing difference in the brain and will last a lifetime.
<b>Comprehension</b>	Students who have dyslexia have poor reading comprehension skills.	Students with dyslexia tend to have strong comprehension skills, but this can be masked by (1) the amount of mental effort required to decode, limiting access to the ability to think critically, and (2) a limited

		amount of reading, leading to a gap in the student's vocabulary as compared to students who read large amounts of appropriate text.
<b>Developmental Milestones</b>	Giving children more time will "fix" reading deficits and address their struggles with literacy.	Early identification and intervention are key! Students identified with a specific learning disability in reading or with characteristics of dyslexia are unlikely to catch up to peers without early, targeted intervention and high-quality instruction rooted in the science of reading.

## Appendix B

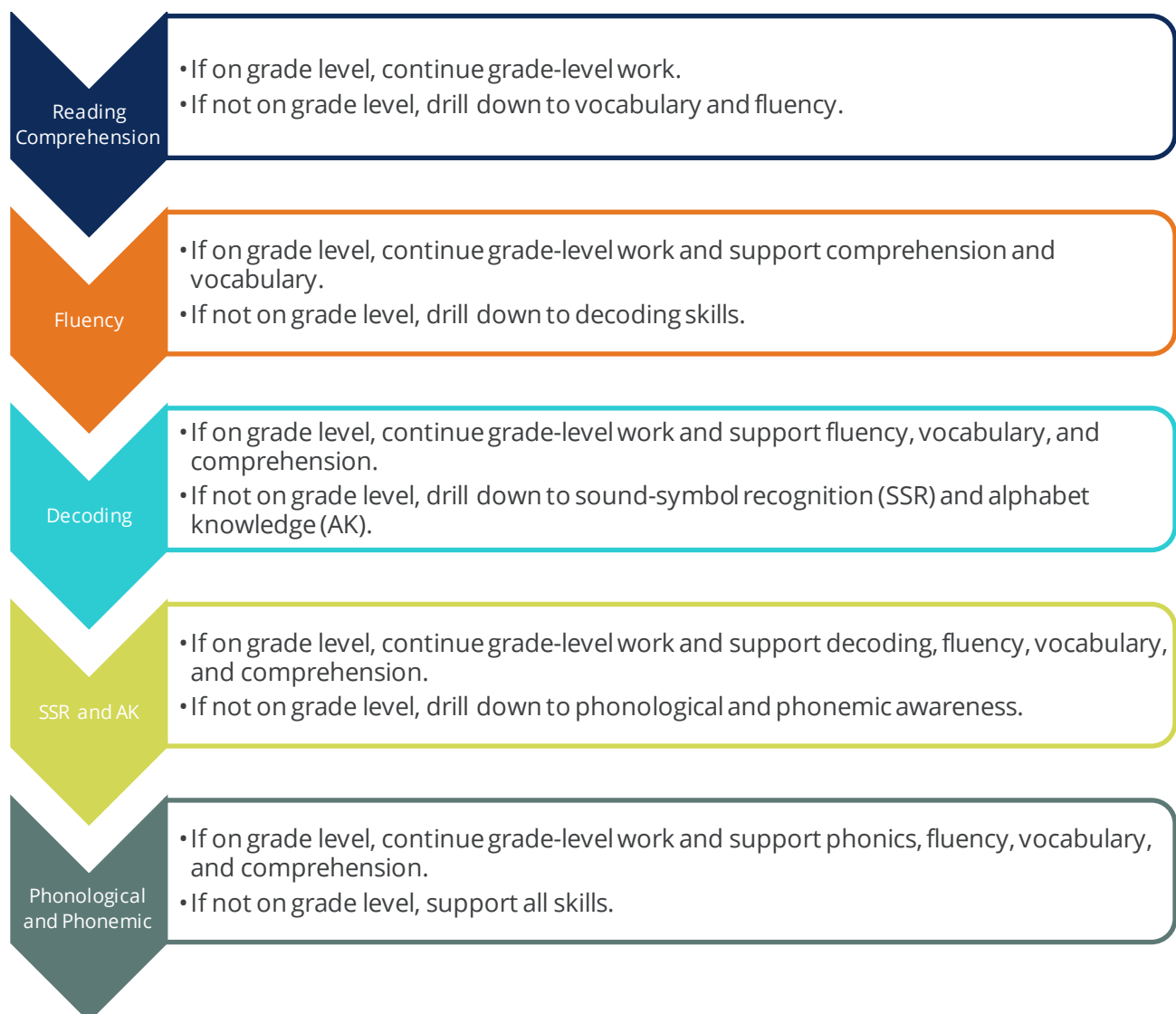
Common Signs of Dyslexia Across Grades and Development. Adapted from [Alexander et al. \(2023\)](#). See [Understanding Dyslexia: A Guide for Tennessee Families](#) for a more complete list.

Age Group	Difficulties
Preschool	<ul style="list-style-type: none"> <li>• Delays in language development or errors in speech sound production</li> <li>• Mispronunciation of words</li> <li>• Difficulties with phonological skills like rhyming or syllable identification/segmentation (word play)</li> <li>• Challenges in letter naming/identification</li> </ul>
Primary and Elementary School	<ul style="list-style-type: none"> <li>• Difficulty with sound symbol correspondence (matching sound to letter)</li> <li>• Persistent or ongoing confusion of similar looking and/or similar sounding letters</li> <li>• Difficulties with phonemic skill tasks, such as isolating beginning, medial, or final sounds, as well as segmenting the individual sounds in words</li> <li>• Reading and spelling errors such as reversals, substitutions, omissions, additions, transpositions, and the addition or omission of suffixes</li> <li>• Difficulty with directions, especially multi-step</li> <li>• Frequent errors when reading high frequency words</li> </ul>
Middle School	<ul style="list-style-type: none"> <li>• Slow or laborious oral reading fluency</li> <li>• Significant difficulties reading and spelling longer words</li> <li>• Lack of awareness in relation to word structure (morphology)</li> <li>• Difficulties in written expression due to root issues in spelling and organization</li> <li>• Challenges with reading comprehension due to word reading deficits</li> </ul>
High School and Adults	<ul style="list-style-type: none"> <li>• Persistent difficulty with word reading that affects comprehension</li> <li>• Slower reading fluency</li> <li>• Spelling and written composition challenges</li> </ul>

No child's development is the same. It is possible that children may reach developmental milestones at different points of the expected range. Reversals and errors are normal parts of learning to read. Persistent and ongoing difficulties in light of high-quality instruction and/or intervention, however, are suggestive of more significant reading struggles. Children with dyslexia continue to struggle after their typically developing peers have stopped.

## Appendix C

The following graphic outlines suggestions for drilling down to determine student need based on screener and skill area data. The suggestions of focus relate to intervention instruction but should also be areas to consider when selecting appropriate classroom-level support. For example, a student who is struggling with decoding would likely need both intervention with a phonics focus but also perhaps accessibility support, such as oral/audio presentation or assistive technology. Additional areas worth assessing are encoding and rapid automatized naming, depending on student profile. In grades K-2, if a student is not on grade level in comprehension, the team should drill down to decoding, since reading comprehension performance at those grade levels generally relates to decoding skill. Please also note that reading comprehension is different than oral language or listening comprehension. Students with characteristics of dyslexia and foundational literacy deficits **may** have average or even advanced oral language skills, while others may not.



## Appendix D

### Guidance on Selecting and Using Classroom Support and Accommodations

Support or Accommodation	Definition(s)	Guidance for Use
<b>Oral/Audio presentation</b>	Oral presentation of text; text to speech (this can be done through assistive technology as well)	Students who are reading below grade-level still need access to complex language and unaltered texts central to the purpose of the lesson and standard(s) being taught in Tier I instruction. This may also apply to textbooks, classroom tests, and written directions upon team discussion and agreement.
<b>Opportunities for fluency practice with decodable (K-3) or appropriate (4-12) texts</b>	Decodable texts are texts composed of predictably patterned words and other high frequency words that a student has already been taught. Appropriate texts, for older students, refer to texts within a student's instructional reading level. Repeated readings and practice with decodable and appropriate texts for the development of fluency is backed by research. The more fluent a student is, the more cognitive resources can be dedicated to comprehension rather than decoding.	Decodable and appropriately targeted texts <b><i>should not</i></b> replace rigorous core texts. Instead, students should be given opportunities for practice with these texts during alternative times to help build fluency (accuracy, rate, and prosody) and confidence. Repeated readings with the same text paired with immediate corrective feedback is a research-based tool for improving student automaticity (fluency) and engagement with a passage.
<b>Multiple formats of presentation (auditory, visual, etc.) and opportunity</b>	While research is not definitive on the effects of multi-sensory learning, there is evidence that the more engaged student senses are in	Multiple formats of presentation can benefit all learners. For struggling learners, it can be especially important to ensure enhanced repetitions and



<b>for multi-sensory learning engagement</b>	learning, the more likely they are to transfer information from working and short-term memory to long-term memory. Multi-sensory learning does not need to involve intricate gadgets or tools. Literacy instruction that engages multiple senses is as simple as having students hear, say, read, and write!	exposures on a concept for students who require extensive practice compared to peers. Having students involve visual, auditory, and kinesthetic modalities within a lesson can enhance attention, engagement, and learning.
<b>No penalty for spelling in writing tasks/opportunities to correct spelling of words with previously taught concepts</b>	Penalties would equate to grade reductions or other punitive consequences.	Students cannot be expected to write words for which they do not have the tools to spell. Student corrections should include phonics patterns and high frequency words the student has been explicitly taught. Students may require visual models or other support in making corrections for both taught concepts and unfamiliar words. The goal of this is to reinforce correct spelling by having the student rewrite the word correctly, not in producing frustration by prolonging additional academic struggle.
<b>Chunking of text and/or task</b>	Chunking refers to breaking longer pieces of text (or a longer task) into more manageable-sized pieces. Chunking can ease the stress of longer passages for struggling readers and provide more opportunities to check for understanding.	Chunking is a scaffold that can support all learners whether during a repeated close reading or a first pass at a text. Struggling readers with characteristics of dyslexia can get fatigued by text easily when reading independently. Breaking the text into smaller chunks can make longer text appear less overwhelming. More frequent checks for understanding inherent in chunked text help to ensure content is not being lost across an entire

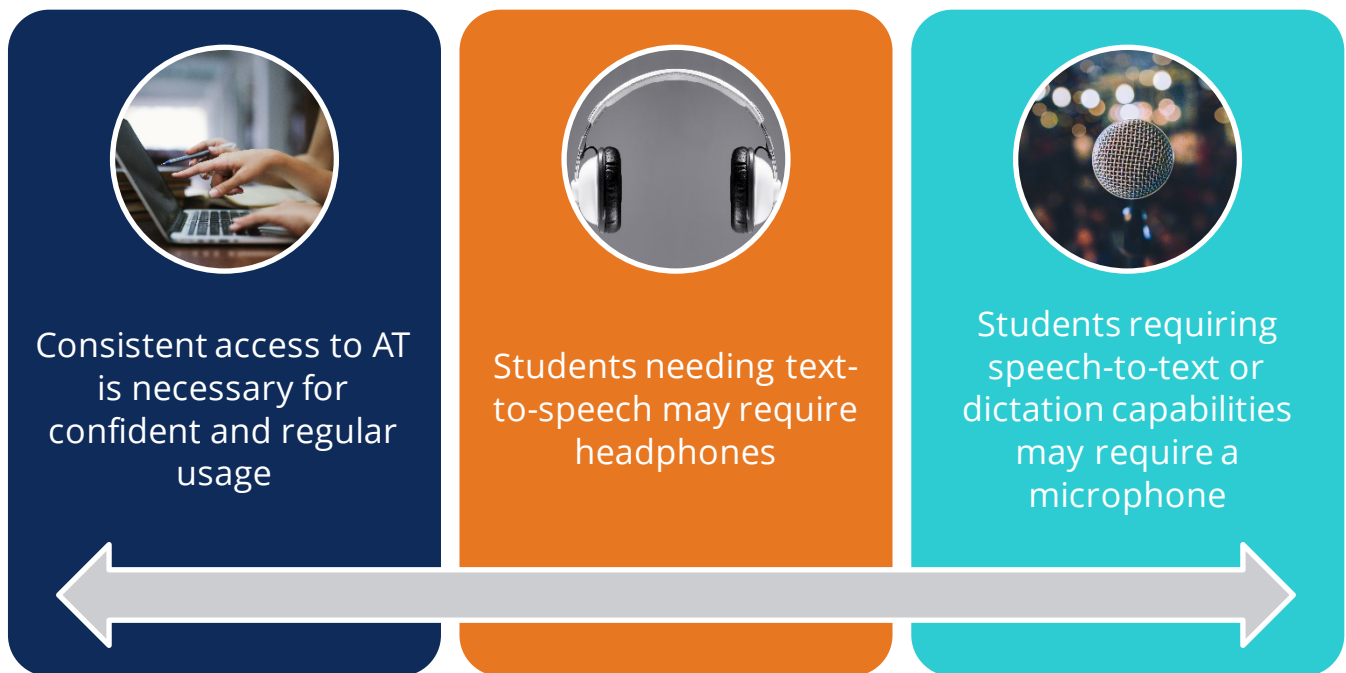
		passage before other scaffolds can be provided.
<b>Pre-teaching of vocabulary and/or background knowledge</b>	Unfamiliar vocabulary or subject matter can produce an additional roadblock for struggling decoders.	Pre-teaching vocabulary does not need to be time-consuming; it can be as simple as seeing the word, saying the word, and using the word in a few contexts. For background knowledge, visuals, videos, companion texts, and discussion are all ways to engage students in an unfamiliar subject before reading the text. This can support all learners, but background knowledge and vocabulary knowledge have been shown to enhance independent comprehension of text even for less skilled decoders.
<b>Other</b>	Other allows teams to indicate other support or accommodations appropriate and necessary for the child to access grade-level Tier I instruction.	Be thoughtful when choosing custom support and accommodation and keep grade-level expectations in mind.

This chart is meant to support districts in choosing and implementing appropriate support and accommodations for students on an ILP-D. Districts must remember that supports are designed to create access to grade-level content and tasks, **not** to lower expectation or standards.

## Appendix E

### Guidance on Selecting and Implementing Assistive Technology

Assistive technology is a tool that can provide access for students with characteristics of dyslexia. Students with foundational deficits often read below grade level. Access to grade-level text is increasingly important as students get older and 1) oral presentation of text is less likely and 2) texts become both syntactically and morphologically more complex.



Assistive technology allows students with foundational deficits to maintain access to grade-level content and become independent in their own learning through regular and supported use. Students may need to learn how to use extensions, apps, cameras, and microphones to use AT effectively. This likely will require training in use and follow-up in implementation to ensure the integrated support is working for each student.

The ILP-D requires schools to indicate who is responsible for the faithful provision and implementation of AT support. See [State Board of Education Rule 0520-01-22-.02\(1\)\(d\)\(5\)\(viii\)](#). This is done to ensure the student is receiving adequate training and follow-up in learning to use any necessary technologies.

## Appendix F

### Family Support Resources

## Acronyms

This appendix houses common acronyms related to RTI<sup>2</sup>, special education, dyslexia, characteristics of dyslexia, and TISA. Not all of these acronyms appear in the body of this guide but are related terms families and districts may need to understand.

Acronym	Meaning
<b>ADA</b>	Americans with Disabilities Act
<b>AT</b>	Assistive technology
<b>AYP</b>	Adequate yearly progress
<b>CoD</b>	Characteristics of dyslexia
<b>FAPE</b>	Free appropriate public education
<b>FERPA</b>	Family Educational Rights and Privacy Act
<b>HQIM</b>	High-quality instructional material
<b>IDEA</b>	Individuals with Disabilities Education Act
<b>IEE</b>	Independent Educational Evaluation
<b>IEP</b>	Individualized education program
<b>ILP</b>	Individual learning plan (for English learners)
<b>ILP-D</b>	Individual learning plan for characteristics of dyslexia

<b>LEA</b>	Local education agency (school district)
<b>LRE</b>	Least restrictive environment
<b>PLEP or PLOP</b>	Present levels of (educational) performance
<b>PWN</b>	Prior written notice
<b>ROI</b>	Rate of improvement
<b>RTI<sup>2</sup></b>	Response to instruction and intervention
<b>SEA</b>	State education agency
<b>SLD</b>	Specific learning disability
<b>SPED</b>	Special education
<b>The department</b>	Tennessee Department of Education
<b>TN PULSE</b>	Tennessee Planning for Unique Learning Success and Excellence

# Parent ILP-D Notification Letter

This letter template is available for districts to send in hard copy form, but it is also loaded into the TN PULSE platform. When a student meets criteria for an ILP-D, the system will generate and send a notification if a parent email or electronic contact is in the system. This will allow for the parent(s) to sign electronically. If a parent signs a hard-copy form of the letter, it is recommended that the signed document is uploaded into the TN PULSE system.

## Reading 360

The Tennessee Department of Education's [Reading 360](#) initiative, including teacher training, family engagement, and commitment to high-quality instructional materials and the science of reading is driving results.

## Tennessee Center for the Study and Treatment of Dyslexia

Middle Tennessee State University's Center for the Study and Treatment of Dyslexia is a research and testing facility with a variety of invaluable resources. The center actively conducts research and supports the translation of research to practice.

View [Understanding Dyslexia: A Guide for Families](#).

Visit their [main webpage](#), with special attention to the Educator and Parent Resources tab.

# Acknowledgements

## ***Characteristics of Dyslexia Working Group***

A group of exceptional educators met on a weekly or bi-weekly basis beginning in October 2022 to provide feedback and input on the resources and materials surrounding characteristics of dyslexia guidance. Thank you to its members.

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Kristi Chapman	Sullivan County Schools	Special Education Teacher
Kathy Daugherty	Murfreesboro City Schools	Reading and RTI Coordinator
Lenora Douglas	Newport City Schools	RTI Coordinator
Janice Fox	Rutherford County Schools	District RTI Coach
Dr. Allison Gardenhour	Johnson City Schools	RTI Coach
Beth C. Glover	Milan County Schools	READ Interventionist/Dyslexia Screener
Tammy Lewis	Marshall County Schools	Supervisor of Elementary Education
Tracy McAbee	Lewis County Schools	Director of Schools
Emily Underwood	Bartlett City Schools	RTI Coach

## ***Dyslexia Advisory Council***

The [Dyslexia Advisory Council](#) has been instrumental in continued reform of identification, service, and advocacy for students with characteristics of dyslexia and dyslexia. Thank you to its members.