Early Literacy Implementation (ELI) and Math Counts Frequently Asked Questions (FAQs)

Iowa Code 279.68 (amended by House File 2618) and the Math Counts Act (House File 784) promote effective assessment, instruction, and intervention practices to support all students in becoming proficient in reading and mathematics.

The common requirements of Iowa Code 279.68, HF2618 and HF784 are: Universal screening in reading and mathematics for students in kindergarten through sixth grade; Intervention and progress monitoring for those identified as Persistently At-Risk; Notice to parents/guardians of students identified as Persistently At-Risk that includes additional services currently provided to the student, proposed supplemental instructional services, strategies the parents/guardians can use at home, and notice of student progress to parents/guardians.

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General

1. **What is the intent of the Early Literacy Implementation (ELI) and Math Counts requirements? Are there differences?**

   These requirements are intended to increase learning outcomes for Iowa K-6 students through quality core instruction, universal screening, targeted intervention and progress monitoring (i.e., personalized reading and mathematics plans) for those Persistently At-Risk. Also required is collaboration with the family to communicate intervention details and recommendations for home support.

The difference is that if a student is Persistently At-Risk in reading, the parents may request retention.

2. **How were existing Early Literacy Implementation requirements from 279.68 amended by Section 2 of House File 2618?**

   HF2618 amends the original 279.68 by adding the following:

   *A school district shall provide to students in kindergarten through the end of grade six who are not reading proficiently with **personalized reading plans** until the student is reading at grade level, as determined by the student's consistently proficient performance on valid and reliable measures of reading ability.*

   *Each school district shall provide **written notice** to the parent or guardian of any student in kindergarten through grade six who is not reading proficiently of the student's level of reading or reading readiness. The written notice shall contain a description of the parent's or guardian's ability to request that the student be retained in the student's current grade level for the subsequent school year.*

*A school district **shall not promote a student** who is not reading proficiently to the next grade level, and shall retain the student in the student's current grade level for the subsequent school year, **if the student's parent or guardian submits to the school district a request** that the student be retained in the student's current grade level pursuant to subparagraph (1).*

3. **Do ELI and Math Counts interplay with the Every Student Succeeds Act (ESSA) and the Iowa School Performance Profile (ISPP) designations? What accountability is built into ELI and Math Counts?**

   The annual ISPP calculations are based on chronic absenteeism, attendance growth, Iowa Statewide Assessment of Student Progress (ISASP) proficiency and growth, English language growth, graduation rates and post-secondary readiness.

   The screening, intervention, monitoring and home collaboration requirements of ELI and Math Counts are focused on early identification and intervention of foundational literacy and mathematical skills. At this time, there is no accountability metric attached to this work. The requirements are intended to provide the tools and structure to increase student outcomes, which, ultimately, will be apparent in later accountability measures, like the ISPP and ESSA Comprehensive and Targeted designations.

4. **Do these requirements apply to accredited nonpublic and charter schools?**

   Charter schools are public schools, so all public-school requirements pertain to charter schools. Accredited nonpublic schools are strongly encouraged to follow this legislation, but not required.

5. **What requirements apply to students receiving ESA funds to attend a private school?**

   It is the responsibility of the parent or guardian to ensure the early literacy and early mathematics requirements are met. Parents and guardians should work with nonpublic schools receiving ESA funds to ensure these requirements are met.

Screening

6. **What are the screening requirements? Are districts required to use the state-approved assessments?**

   All Iowa public and charter school K-6 students are to be screened on an approved literacy and mathematics screener three times a year. The intent of these periodic screenings is to identify risk and intervene early in a student's school years. A list of assessments meeting Department-adopted minimum standards is available on the Department's approved Early Literacy and Early Mathematics assessments documents.

7. **Can districts continue to use the assessments they already have in place in order to implement these rules?**

   If the district's assessment appears on the Department-approved list, it may be used for the purposes of universal screening and/or progress monitoring.

8. **Can a parent or guardian refuse to have their child screened or monitored during intervention?**

   Parent/guardian refusal is not permitted by current legal guidance, with the exception of students who are homeschooled or dual-enrolled. For dual enrollment, the district must offer the screening, but parents can decline. The procedures regarding continued parent/guardian refusal for district-wide assessments are local decisions. It is recommended that districts follow the same local steps as for any other parent/guardian refusal.

Risk and Proficiency Determination, Literacy and Mathematics Status

9. **What are the data source(s) and decision-making criteria used to identify Persistently At-Risk students? How are screening and ISASP used to make entry and exit determinations?**

   In grades K-3, identification of Persistently At-Risk remains the same. Students below benchmark during two consecutive screening windows in either literacy or mathematics are to be provided targeted intervention and progress monitoring.

   In grades 4-6, identification of Persistently At-Risk can be made on one of three sources: (1) Continuation of Persistently At-Risk from Grade 3, followed by below benchmark into Grade 4, (2) New screening data falling below the benchmark twice consecutively, or (3) Below or Approaching Grade Level Expectations on the ISASP Reading subtest and Mathematics section. Students are to be provided with targeted intervention and progress monitoring.

   Students in grades K-3 exit when they perform above benchmark twice consecutively, while the exit criteria for grades 4-6 are based on a local district's use of both consecutive window screening data and the most recent ISASP performance.

   The statewide MTSS data system calculates literacy and mathematics status derived from available screening data after the close of each window. These provided status levels (i.e., Adequately Progressing, At-Risk, and Persistently At-Risk) will indicate each student's status based on the requirements and history of screening data. These status indicators do not incorporate ISASP data.

10. **How does the At-Risk status fit? What is required?**

    Panorama Student Success will continue to calculate and display the At-Risk literacy and mathematics status as it has previously. Although no actions are required at this point, support may be appropriate. Until a student meets or exceeds benchmarks consecutively, intervention and monitoring are recommended.

11. **The way the entry and exit criteria are written, it seems that a student could simultaneously demonstrate a need for intervention (i.e., Below benchmark or *Below* or *Approaching* on ISASP) and exit from intervention (i.e., Above benchmark or *Meeting* or *Exceeding* on ISASP), especially in the spring when both screening and ISASP data are available. How does a school handle a situation where a student might have contradictory data?**

    There may be inconsistent data between the two assessments for some students. The use of both yearly ISASP and more frequent screening data allows for flexibility and responsiveness throughout the school year for entering and exiting students. Even with inconsistent information, it may be in the student's best interest to move forward with the personalized reading or mathematics plan and progress monitoring to ensure the student has developed all the necessary literacy or mathematics skills. There may be cases where, for example, more recent screening data shows that last spring's ISASP may not be the most representative of current skills, or in fact, the team may be confident that ISASP scores are a better representation of need than screening data.

    School teams have the flexibility and professional responsibility to be responsive to available data and attentive to student needs to best meet the instructional needs of each student. This flexibility is not a permission to focus on only preferred data, but rather the latitude to efficiently use resources to effectively meet student needs.

12. **When does a school team stop the Persistently At-Risk requirements (i.e., intervention, progress monitoring, parent collaboration, etc.)?**

    A team may discontinue intervention when a student performs above benchmark on two consecutive screening windows or is Meeting Grade or Exceeding Grade Level Expectations on ISASP Reading or Mathematics.

13. **What happens after grade 6?**

    A student Persistently At-Risk continues to receive support and grade-appropriate monitoring of progress standards. This may be evidenced through continued screening data (if available), ISASP performance or sound local classroom assessments.

14. **Can other data sources (e.g., ELPA21, grades, classroom observations, etc.) be used to determine reading and mathematics proficiency?**

    While educators are informed by all data sources, ISASP achievement levels, when available, and patterns of need demonstrated with ongoing screening data are used to determine proficiency and risk. Additional data could be used to identify and include additional students receiving interventions, but cannot be used to prematurely exit a student from receiving intervention/progress monitoring.

Personalized Reading and Mathematics Plans

15. **Is the use of the Department's Personalized Reading Plan or Personalized Mathematics Plan required?**

    No. This is a model plan that districts may use or adapt to meet the requirements of House File 2618 and the MathCounts Act. Use of these specific templates is not required, although intervention plans must be written within 30 days of identification. Other means (e.g., Panorama Student Success intervention plan) can be used.

16. **Will we be required to maintain personalized intervention plans for students in grades K-6?**

    Yes. This is to preserve an accurate history of student needs, intervention success, parent/guardian communication, and to enable continuity of support across grades.

17. **Do schools provide students' personalized plans to parents/guardians?**

    Yes. Schools should develop personalized plans in partnership with parents/guardians who receive regular progress updates aligned to the goals of the plan.

18. **Do schools submit students' personalized plans to the Department of Education?**

    Schools do not submit ongoing or completed student Personalized Reading and Mathematics Plans to the Department.

19. **Is the sole act of progress monitoring considered an intervention for At-risk students?**

    No. The purpose of progress monitoring is to evaluate the improvement students are making toward end-of-year goals given the instruction and/or intervention. Progress monitoring is not an intervention as it is not designed to teach skills. It measures the impact of instruction and the extent to which a student's skills are improving.

20. **Why aren't interventions required when a child is below benchmark (i.e., At-Risk)? When should we intervene with a student who is At-Risk?**

    Although not required, it is recommended that intervention and monitoring be provided to At-Risk students. Doing so will allow the school to monitor student progress toward end-of-year goals.

21. **If we use two of the approved universal screening assessments and a student scores above the benchmark target on one and below on the other, which should we use?**

    A school may use multiple approved screening assessments; however, the district-identified default assessment will be used across the three screening windows to populate Healthy Indicator (HI) Reports and student risk status in Panorama Student Success. The default measures for literacy and mathematics must be selected annually in CASA during the identified default selection period. Changes to default assessment selections will not be allowed after the fall default assessment window has closed.

22. **After providing quality core instruction and targeted intervention along with ongoing progress monitoring data, at what point does a team suspect a student may have an educational disability? How does this work relate to a suspicion of disability according to the Individual with Disabilities Education Act (IDEA)?**

    A disability can be suspected at any time, with or without intervention or progress monitoring data; however, some criteria for suspicion of disability are difficult to establish without these types of data (e.g., student response to instruction and intensification of instruction). Ultimately, suspicion of an educational disability is a local team decision, guided by data and Child Find procedures. Consult with the local Child Find team to make a sound decision based on the existing data in the interest of the student.

Home Communication, Written Notice, Retention

23. **What must be included in the components of parent or guardian communication / written notice and collaboration?**

    The written notice to parents or guardians of any student in kindergarten through grade six who is Persistently At-Risk must describe the student's level of reading, reading readiness, or mathematics, including all relevant approved screener and ISASP data, and easily understood descriptions of those results within 10 days following the assessment/screener. Schools should develop personalized plans for all students Persistently At-Risk in partnership with parents/guardians, who must receive regular progress updates aligned to the goals of the plan.

    In literacy, the written notice must also explain the parent's or guardian's ability to request to retain their child in the student's current grade level for the subsequent school year, which should include a description of how to submit such a request through multiple, accessible formats.

24. **When should written notices and corresponding educator and parent/guardian conversations occur?**

    Written notices to parents or guardians of any student in kindergarten through grade six who is identified as Persistently At-Risk should be sent within 10 days following the administration of the assessment/screener. This provides adequate time for educators and parents/guardians to partner in identifying and implementing needed supports and interventions in the Personalized Reading or Mathematics Plan.

25. **Is a Parent Contract in literacy still required?**

    A separate parent contract is not required as long as the intervention plan itself contains a clear description of the student's needs, interventions being provided, and strategies parents can implement to support the plan. Components of the plan should be easily understood by the parent or guardian.

26. **Do we need to send separate written notices to parents for ELI and the required written notice as part of HF2618 that notifies parents of the right to retain the student?**

    No. A school district may choose to meet multiple requirements in a single written notice.

27. **May a parent/guardian retain a student who was previously retained and is still not reading proficiently after the year of retention?**

    Yes. A parent/guardian's ability to retain a student is not limited to a single time. Educators should support parents/guardians in making informed educational decisions for their child. A student not reading proficiently in a grade for two years or more may raise concerns regarding the current or prior instructional program's quality and ability to meet the student's needs.

28. **When should conversations regarding a parent/guardian's retention request occur?**

    Schools should always be responsive to parents' requests for discussions related to retention. Depending on the time of the school year in which such a request is made, educators may focus on the following to support the parent/guardian in making informed educational decisions for their child:

    Reviewing recent student assessment and progress data.

    Ensuring the Personalized Reading Plan, including the interventions and supports, is meeting the child's needs.

    Ensuring that, if a child is retained, the instructional program will meet the child's needs.

    Generally, retention conversations are most effective in the spring before the upcoming school year. Parents/guardians may also revisit retention decisions before the start of the school year based on their child's progress during the summer months, including through summer reading programs.

29. **How often should schools apprise the parent or guardian of the student's academic progress?**

    Information showing the student's progress should be provided to parents/guardians at least quarterly.

30. **What is meant by "participation in regular parent-guided home reading"?**

    Guidance for parents/guardians to assist their children at home is provided by the Iowa Reading Research Center, the Iowa Comprehensive State Literacy Plan and Iowa's parent guides. Each resource provides activities parents/guardians can implement with their children to assist them in reading and mathematics.

Student Groups

31. **How do ELI and the Math Counts Act apply to prekindergarten/preschool or transitional kindergarten programs?**

    ELI and Math Counts do not apply to preschool programs. However, if a kindergarten-age eligible child is participating in Statewide Voluntary Preschool Programs (SWVPP), the child would need to be assessed using an approved kindergarten-age assessment if the district receives kindergarten funding for the child. "Alternative," "Transitional," "Junior" or similarly named kindergarten programs are considered kindergarten programs and will adhere to stated requirements. If a kindergarten-age eligible child is participating in SWVPP and an alternative kindergarten program, the child would be assessed using a Department-approved kindergarten-age assessment.

32. **Are transitional-type kindergarten students who are required to be tested also required to have progress monitoring and intervention as well?**

    If a learner is assigned the kindergarten grade level in the student information system, the learner is in kindergarten and all requirements apply.

33. How would this affect a four-year-old program that also serves five-year-olds in that same classroom and is a nonpublic school? Do they have the option to opt out of this?

The ELI and Math Counts Act requirements apply to all school-age children, including any nonpublic student receiving services in public schools or ESA funding.

34. What are the requirements for students who are English Learners (ELs)?

English learners are required to participate in universal screening and progress monitoring, as well as At-Risk and Persistently At-Risk supports. Discontinuing the test is allowable in some cases when the assessment is too difficult for newly arrived students who are at the emerging levels of English acquisition. In individually determined circumstances, the use of another approved screening assessment to determine literacy status may be appropriate.

35. What accessibility supports are appropriate for ELs? What is allowable for ELs taking the assessments?

For the purpose of risk identification in English-based literacy and mathematics, the screening assessments should be used according to their standardized administration procedures, allowable accessibility features, scoring directions and benchmarks. It is understood that ELs are likely to demonstrate risk on English-based screening. To support subsequent decision-making, teams may also consider the amount of time exposed to English, prior and current instruction, and assessment results in the native language, if available.

36. What is the screening process for students who have significant cognitive disabilities?

The requirements apply to students with significant cognitive disabilities. Students who require an alternate assessment aligned to alternate academic achievement standards in reading will take Iowa's Early Literacy Alternate Screener (ELAS). ELAS meets the ELI requirements for universal screening and progress monitoring. It is reasonable that a student being served on an Individualized Education Plan (IEP), qualifying for alternate assessment, with a status of persistently at risk, would have an appropriate goal in the area of literacy on the IEP. This meets the ELI requirement for intensive instruction in literacy when required by literacy status.

The Early Mathematics Alternate Screener will be available starting in fall 2026.

37. Are students with IEPs exempt from universal screening and progress monitoring?

Students with IEPs are required to participate in universal screening and progress monitoring, as well as At-Risk and Persistently At-Risk supports. An IEP team may decide to monitor a student's progress on an IEP goal using an assessment that is not on the approved list, but this must be done in addition to progress monitoring with an approved assessment if the student is also identified as Persistently At-Risk. IEP teams that are already using an approved progress monitoring tool for an IEP goal in the area of literacy or mathematics and progress monitoring at least every other week do not have to do additional progress monitoring, as an IEP serves the functional equivalent of a personalized intervention plan.

38. What does this mean for students who currently receive IEP services in the area of reading or mathematics? Do these rules apply to them?

Yes. When a student receives special education services, they are already receiving both intervention and progress monitoring services. As a reminder, students with IEPs are general education students and take advantage of all appropriate services available to all students, including those implemented as a result of the Early Literacy and Math Counts laws.

39. Can the specially designed instruction of an IEP be considered the intensive intervention and count towards the 90 minutes of literacy instruction?

For students with IEPs and reading goals, IEP teams determine the specially designed instruction needs, including interventions needed in addition to core reading or mathematics instruction. This includes both supports needed to access core instruction within the 90 minutes, as well as interventions needed to remediate skill deficiencies.

40. Do the ELI and Math Counts requirements apply to homeschool and/or dual-enrolled students?

The requirements apply to homeschool and/or dual-enrollment students in that the district is required to offer the same services to this population as provided to any other student within the district. Specifically, districts are required to offer - but may not compel - any dual-enrolled or home school assistance program (HSAP) student or parent/guardian to take part in any of the following: universal screening, progress monitoring, parent/guardian contract, and additional intensive reading instruction.

41. Can the parents/guardians of students who are homeschooled opt out of screening, progress monitoring, or additional reading services requirements?

Yes. Students who are homeschooled may, but are not required to, participate in screening, progress monitoring or additional reading services. Districts should not compel students to be universally screened, have their student progress monitored, or accept additional reading instruction. Parents and guardians of home school dual-enrolled/HSAP students may accept screening and decline progress monitoring or additional reading services, or they may accept any combination of offered support.

42. Do these requirements apply to dual-enrolled students?

It is required that districts offer universal screening, progress monitoring and additional reading services to dual-enrolled students and students who participate in the district’s home school assistance program.