

Silsbee ISD

Dyslexia Guidelines



Vision

The students of Silsbee ISD are equipped with the values to envision a better world, the skills to create it, and the confidence to take the lead. – **Values. Skills. Confidence.**

Goals

- Silsbee ISD will develop a comprehensive system of benchmarks that will drive continuous improvement in student achievement and operational efficiency.
- Silsbee ISD will enhance offerings and facilities so that all students have access to courses that progressively prepare them for success in their chosen post-secondary pursuits.
- Using board, student, and community-leader resources, Silsbee ISD will develop, communicate, and execute a Board-Superintendent initiated plan to promote parent and community support of educational efforts of the district.

Dyslexia Mission Statement

The mission of the Silsbee Independent School District Dyslexia Program is to:

Provide all eligible students identified as having characteristics of dyslexia with the multi-sensory strategies and phonological processing skills necessary to compensate for deficiencies in the areas of reading, writing, and spelling. The goal is to nurture a strong self-esteem and provide opportunities for students to develop their talents. Strategies will be taught to help students gain personal success while learning to compensate for their reading disorder and enable them to become a lifelong learner.

The Dyslexia Program is built upon the foundation of the Silsbee Independent School District's Mission Statement. (Policy AE)

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Definition and Characteristics of Dyslexia

The student who struggles with reading and spelling often puzzles teachers and parents. The student displays ability to learn in the absence of print and receives the same classroom instruction that benefits most children; however, the student continues to struggle with some or all of the many facets of reading and spelling. This student may be a student with dyslexia.

Texas Education Code (TEC) §38.003 defines dyslexia and related disorders in the following way:

"Dyslexia" means a disorder of constitutional origin manifested by a difficulty in learning to read, write, or spell, despite conventional instruction, adequate intelligence, and sociocultural opportunity. "Related disorders" include disorders similar to or related to dyslexia, such as developmental auditory imperception, dysphasia, specific developmental dyslexia, developmental dysgraphia, and developmental spelling disability.
TEC §38.003(d)(1)-(2) (1995)

The International Dyslexia Association defines "dyslexia" in the following way:

Dyslexia is a specific learning disability that is neurological 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. (Adopted by the International Dyslexia Association Board of Directors, November 12, 2002)

The Dyslexia Handbook – Revised 2021 pg 1

Students identified as having dyslexia typically experience primary difficulties in phonological awareness, including phonemic awareness and manipulation, single-word reading, reading fluency, and spelling. Consequences may include difficulties in reading comprehension and/or written expression. These difficulties in phonological awareness are unexpected for the student's age and educational level and are not primarily the result of language difference factors. Additionally, there is often a family history of similar difficulties.

The following are the primary reading/spelling characteristics of dyslexia:

- Difficulty reading words in isolation
- Difficulty accurately decoding unfamiliar words
- Difficulty with oral reading (slow, inaccurate, or labored without prosody)
- Difficulty spelling

It is important to note that individuals demonstrate differences in degree of impairment and may not exhibit all the characteristics listed above.

Common Risk Factors Associated with Dyslexia

If the following behaviors are unexpected for an individual's age, educational level, or cognitive abilities, they may be risk factors associated with dyslexia. A student with dyslexia usually exhibits several of these behaviors that persist over time and interfere with his/her learning. A family history of dyslexia may be present; in fact, recent studies reveal that the whole spectrum of reading disabilities is strongly determined by genetic predispositions (inherited aptitudes) (Olson, Keenan, Byrne, & Samuelsson, 2014).

The following characteristics identify risk factors associated with dyslexia at different stages or grade levels.

Preschool

- Delay in learning to talk
- Difficulty with rhyming
- Difficulty pronouncing words (e.g., "pusgetti" for "spaghetti," "mawn lower" for "lawnmower")
- Poor auditory memory for nursery rhymes and chants
- Difficulty adding new vocabulary words
- Inability to recall the right word (word retrieval)
- Trouble learning and naming letters and numbers and remembering the letters in his/ her name
- Aversion to print (e.g., doesn't enjoy following along if a book is read aloud)

Kindergarten and First Grade

- Difficulty breaking words into smaller parts, or syllables (e.g., "baseball" can be pulled apart into "base" "ball" or "napkin" can be pulled apart into "nap" "kin")
- Difficulty identifying and manipulating sounds in syllables (e.g., "man" sounded out as /m/ /ă//n/)
- Difficulty remembering the names of letters and recalling their corresponding sounds
- Difficulty decoding single words (reading single words in isolation)
- Difficulty spelling words the way they sound (phonetically) or remembering letter sequences in very common words seen often in print (e.g., "sed" for "said")

Second Grade and Third Grade

Many of the previously described behaviors remain problematic along with the following:

- Difficulty recognizing common sight words (e.g., "to," "said," "been")
- Difficulty decoding single words
- Difficulty recalling the correct sounds for letters and letter patterns in reading
- Difficulty connecting speech sounds with appropriate letter or letter combinations and omitting letters in words for spelling (e.g., "after" spelled "eftr")
- Difficulty reading fluently (e.g., reading is slow, inaccurate, and/or without expression)
- Difficulty decoding unfamiliar words in sentences using knowledge of phonics
- Reliance on picture clues, story theme, or guessing at words
- Difficulty with written expression

Common Risk Factors Associated with Dyslexia cont.

Fourth Grade through Sixth Grade

Many of the previously described behaviors remain problematic along with the following:

- Difficulty reading aloud (e.g., fear of reading aloud in front of classmates)
- Avoidance of reading (particularly for pleasure)
- Difficulty reading fluently (e.g., reading is slow, inaccurate, and/or without expression)
- Difficulty decoding unfamiliar words in sentences using knowledge of phonics
- Acquisition of less vocabulary due to reduced independent reading
- Use of less complicated words in writing that are easier to spell than more appropriate words (e.g., “big” instead of “enormous”)
- Reliance on listening rather than reading for comprehension

Middle School and High School

Many of the previously described behaviors remain problematic along with the following:

- Difficulty with the volume of reading and written work
- Frustration with the amount of time required and energy expended for reading
- Difficulty reading fluently (e.g., reading is slow, inaccurate, and/or without expression)
- Difficulty decoding unfamiliar words in sentences using knowledge of phonics
- Difficulty with written assignments • Tendency to avoid reading (particularly for pleasure)
- Difficulty learning a foreign language

The Importance of Early Screening

If the persistent achievement gap between dyslexic and typical readers is to be narrowed, or even closed, reading interventions must be implemented early, when children are still developing the basic foundation for reading acquisition. The persistent achievement gap poses serious consequences for dyslexic readers, including lower rates of high school graduation, higher levels of unemployment, and lower earnings because of lowered college attainment. Implementing effective reading programs early, even in preschool and kindergarten, offer the potential to reduce and perhaps even close the achievement gap between dyslexic and typical readers and bring their trajectories closer over time.

—Ferrer, et al., Achievement Gap in Reading Is Present as Early as First Grade and Persists through Adolescence, 2015

[For information regarding State and Federal Requirements, view pages 7–9 of The Dyslexia Handbook,, 2021 update](#)

Dyslexia Screening

Kindergarten and Grade 1 Universal Screening

The requirement in TEC §38.003 that all kindergarten and first grade students be screened for dyslexia and related disorders is aligned with this shift to identify students at risk for dyslexia and reading difficulties when they are just beginning their formal education. Universal screeners generally measure reading or literacy-related skills such as sound-symbol recognition, letter knowledge, phonological awareness, and other skills.

Silsbee ISD will screen Kindergarten by the end of school year and families will be notified of results in June. First Grade will be screened by the end of January each year and families will be notified of the results in February.

Screening Criteria

Regardless of the primary language of the student, instruments used to screen for dyslexia and other reading difficulties must address the skills in Figure 2.2 below.

Figure 2.2. Criteria for English and Spanish Screening Instruments	
Kindergarten	1st Grade
• Letter Sounds Knowledge of Letter Naming Fluency • Phonological Awareness	• Word Reading Accuracy or Fluency • Phonological Awareness

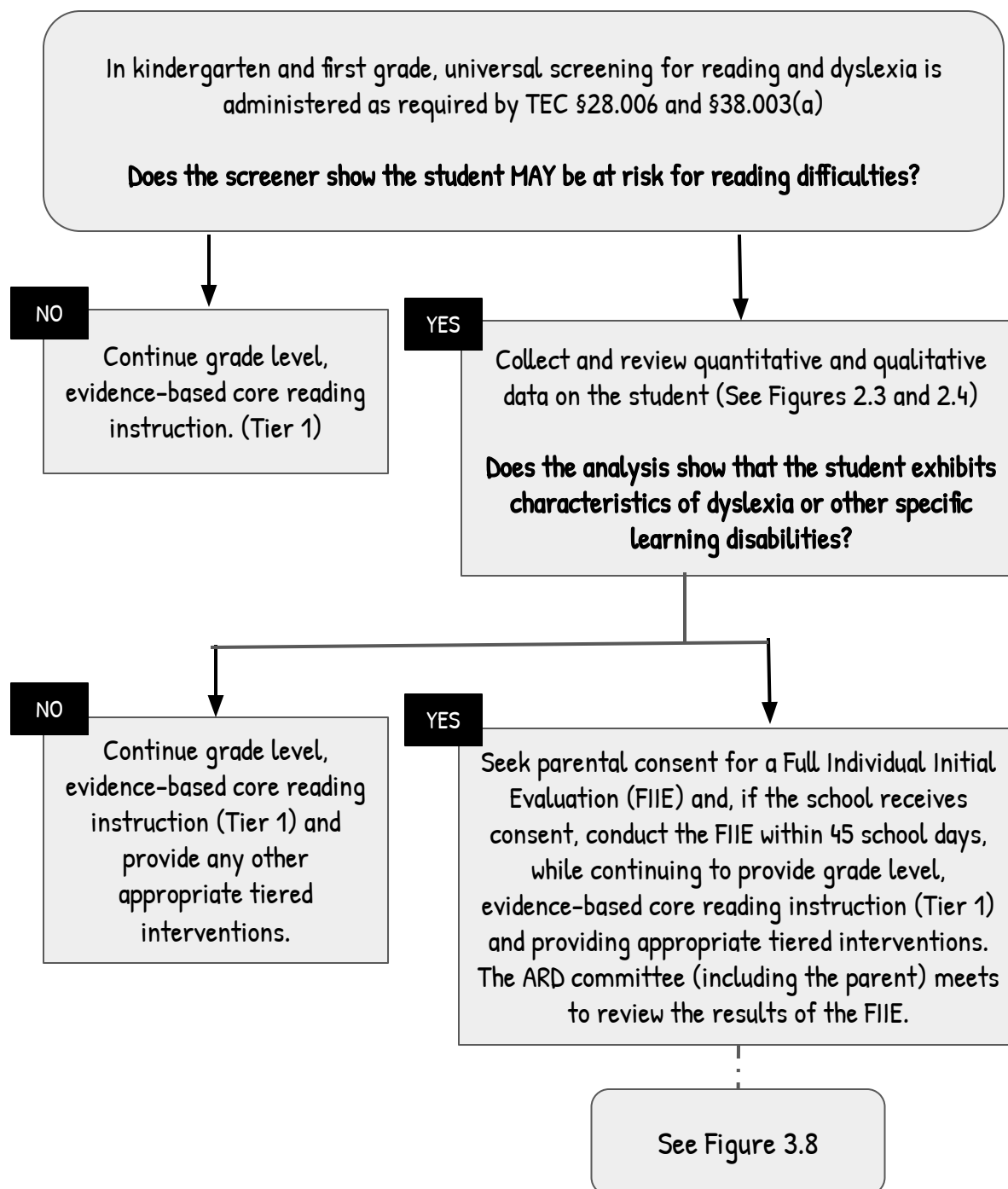
While the selected screening instrument will be expected to measure each of the skills identified above, it is important that individuals who administer the screening instrument document student behaviors observed during the administration of the instrument. A list of behaviors that may be observed during the administration of the screening and which should be documented are included in Figure 2.3 below.

Figure 2.3. Student Behaviors Observed During Screening
• Lack of automaticity • Difficulty sounding out words left to right • Guessing • Self-correcting • Inability to focus on reading • Avoidance behavior

Both quantitative and qualitative information are critical components of the screening process. Examples of quantitative and qualitative information used in determining next steps are provided in Figure 2.4 below.

Figure 2.4. Sources and Examples of Screening Data	
Quantitative Information	Qualitative Information
• Current screening instruments • Previous screening instruments • Formal and informal classroom reading assessments • Additional brief and targeted skill assessments	• Observations of student during screening • Other observations of student progress • Teacher observations • Parent/guardian input • Current student work samples • Work samples from earlier grade(s) • Intervention history

Universal Screening and Data Review for Reading Risk



Best Practices for Ongoing Monitoring

Ongoing progress monitoring allows educators to assess student academic performance in order to evaluate student response to evidence-based instruction. Progress monitoring is also used to make diagnostic decisions regarding additional targeted instruction that may be necessary for the student.

While some kindergarten and first grade students may not initially appear to be at risk for dyslexia based on screening results, they may actually still be at risk. Students who have learned to compensate for lack of reading ability and twice-exceptional students are two groups who may not initially appear to be at risk for dyslexia based on the results of a screening instrument.

Procedures for the Evaluation and Identification of Students with Dyslexia

The process involves both state and federal requirements that must be followed. The evaluation and identification process for students suspected of having dyslexia is guided by the Individuals with Disabilities Education Act (IDEA)

Both state and federal legislation emphasize early identification and intervention for students who may be at risk for reading disabilities such as dyslexia. Those professionals responsible for working with students with reading difficulties should be familiar with the legislation listed in Figure 3.1 below.

Figure 3.1. State and Federal Laws

TEC §28.006, Reading Diagnosis

This state statute requires schools to administer early reading instruments to all students in kindergarten and grades 1 and 2 to assess their reading development and comprehension. Additionally, the law requires a reading instrument from the commissioner's approved list be administered at the beginning of grade 7 to any student who did not demonstrate proficiency on the sixth-grade reading assessment administered under TEC §39.023(a). If, on the basis of the reading instrument results, students are determined to be at risk for dyslexia or other reading difficulties, the school must notify the students' parents/guardians. According to TEC §28.006(g), the school must also implement an accelerated (intensive) reading program that appropriately addresses the students' reading difficulties and enables them to catch up with their typically performing peers.

TEC §38.003, Screening and Treatment for Dyslexia

Texas state law requires that public school students be screened and tested, as appropriate, for dyslexia and related disorders at appropriate times in accordance with a program approved by the SBOE. The program approved by the SBOE must include screening for each student at the end of the kindergarten year and then again during first grade.

Elementary and Secondary Education Act (ESEA) as reauthorized by the Every Student Succeeds Act of 2015 (ESSA)

The services offered to students who are reported to be at risk for dyslexia or other reading difficulties should align to the requirements of ESSA, which requires schools to implement comprehensive literacy instruction featuring "ageappropriate, explicit, systematic, and intentional instruction in phonological awareness, phonic decoding, vocabulary, language structure, reading fluency, and reading comprehension" (ESSA, 2015).

Equal Education Opportunity Act (EEOA)

This civil rights law ensures that all students are given equal access to educational services regardless of race, color, sex, religion, or national origin. Therefore, research-based interventions are to be provided to all students experiencing difficulties in reading, including ELs, regardless of their proficiency in English.

Individuals with Disabilities Education Act (IDEA)

The most recent reauthorization of this federal act is consistent with ESSA in emphasizing quality of instruction and documentation of student progress. A process based on the student's response to scientific, research-based intervention is one of the criteria included in IDEA that individual states may use in determining whether a student has a specific learning disability, including dyslexia.

The Referral Process for Dyslexia and Related Disorders

The Dyslexia Handbook – 2021 Update, pages 21-33

The determination to refer a student for an evaluation must always be made on a case-by-case basis and must be driven by data-based decisions. The referral process itself can be distilled into a basic framework as outlined below.

Educator Request Evaluation

Educators must recommend evaluation for dyslexia if the student demonstrates the following:

- Poor performance in one or more areas of reading and spelling that is unexpected for the student's age/grade
- Characteristics and risk factors of dyslexia indicated in Chapter 1: Definitions & Characteristics of Dyslexia

A team of persons with knowledge of the student, instructional practices, and instructional options meets to discuss data collected, including data obtained during kindergarten and/or first grade screening, and the implications of that data.

- If the team determines that the data does not give the members reason to suspect that a student has dyslexia, a related disorder, or other disability, the team may decide to provide the student with additional support in the classroom or through the RTI/MTSS process.
- If the team suspects that the student has dyslexia, a related disorder, or another disability included within the IDEA, the team must refer the student for a full individual and initial evaluation (FIIE).

Parent or Guardian Request Evaluation

- Once a parent request for dyslexia evaluation has been made, the school district is obligated to review the student's data history to determine whether there is reason to suspect the student has a disability.
- If a disability is suspected, the student needs to be evaluated following the guidelines outlined in this chapter. Under the IDEA, if the school refuses the request to evaluate, it must give parents prior written notice of refusal to evaluate, including an explanation of why the school refuses to conduct an FIIE, the information that was used as the basis for the decision, and a copy of the Notice of Procedural Safeguards. Should the parent disagree with the school's refusal to conduct an evaluation, the parent has the right to initiate dispute resolution options including; mediation, state complaints, and due process hearings. Additionally, the parent may request an Independent Educational Evaluation (IEE) at public expense.
- Should the parent believe that their child is eligible for Section 504 aids, accommodations, and services the parent may request an evaluation under Section 504.

Procedures for Evaluation

Data Gathering

Schools collect data on all students to ensure that instruction is appropriate and scientifically based. Essential components of comprehensive literacy instruction are defined in Section 2221(b) of ESSA as explicit, systematic, and intentional instruction in the following:

- Phonological awareness
- Phonic coding
- Vocabulary
- Language structure
- Reading fluency
- Reading comprehension

Sources and examples of cumulative data are provided in Figure 3.2.

Figure 3.2. Sources and Examples of Cumulative Data	
• Vision screening • Hearing screening • Teacher reports of classroom concerns • Classroom reading assessments • Accommodations or interventions provided • Academic progress reports (report cards) • Gifted/talented assessments • Samples of schoolwork • Parent conference notes • Results of kindergarten-grade 1 universal screening as required in TEC §38.003 • K–2 reading instrument results as required in TEC §28.006 (English and native language, if possible)	• 7th-grade reading instrument results as required in TEC §28.006 • State student assessment program results as described in TEC §39.022 • Observations of instruction provided to the student • Previous evaluations • Outside evaluations • Speech and language assessment • School attendance • Curriculum-based assessment measures • Instructional strategies provided and student’s response to the instruction • Screening data • Parent survey

Language Proficiency Data

Much diversity exists among Emergent Bilinguals (EB). EBs may be students served in English as a second language (ESL) programs as well as students designated Limited English Proficient (LEP) whose parents have denied services. The Language Proficiency Assessment Committee (LPAC) maintains documentation (TAC §89.1220(g)-(i)) that is necessary to consider when identifying ELs with dyslexia.

The LPAC is required to meet annually to review student placement and progress and consider instructional accommodations and interventions to address the student's linguistic needs. Since the identification and service delivery process for dyslexia must be aligned to the student's linguistic environment and educational background, involvement of the LPAC is required. Additional data sources for ELs are provided below in Figure 3.3.

Figure 3.3. Additional Data Sources for English Learners

- Home Language Survey
- Assessment related to identification for limited English proficiency (oral language proficiency test and norm-referenced tests—all years available)
- Texas English Language Proficiency Assessment System (TELPAS) information for four language domains (listening, speaking, reading, and writing)
- Instructional interventions provided to address language needs
- Information regarding previous schooling inside and/or outside the United States
- Type of language program model provided and language of instruction

Environmental and Socioeconomic Factors

Information regarding a child's early literacy experiences, environmental factors, and socioeconomic status must be part of the data collected throughout the data gathering process. These data support the determination that difficulties in learning are not due to cultural factors or environmental or economic disadvantage. Studies that have examined language development and the effects of home experiences on young children indicate that home experiences and socioeconomic status have dramatic effects on cumulative vocabulary development (Hart & Risley, 1995). Having data related to these factors may help in determining whether the student's struggles with reading are due to a lack of opportunity or a reading disability, including dyslexia.

Assessment, Identification and Placement Process

Silsbee ISD will NOT assess until parental consent for evaluation is obtained. Dyslexia Interventionists will not perform any screenings or assessments until after referral documentation is all in place and approved.

1. Within 45 instructional days of parent consent for Dyslexia Assessment, the student must be assessed by individuals/professionals who have been trained in the evaluation of students for dyslexia and related disorders (19 TAC §74.28).
2. In compliance with §504 and IDEA 2004, the Dyslexia Therapist will use the assessment instruments that have been approved by the district for the purpose of identifying for characteristics of dyslexia.
3. The Dyslexia Therapist shall integrate the sum of the data collected into the final dyslexia assessment report.
4. Within 30 instructional days of receipt of completed Dyslexia Assessments §504 Committee, schedules with parents and meets to make determination of Dyslexia and/or §504 eligibility. A representative from the Dyslexia Program will attend the meeting.
5. The §504 Committee, including a representative from the Dyslexia Program, shall use ALL pertinent student data collected to interpret the results derived from the formal assessments given for Dyslexia.
6. Upon determination of eligibility, the §504 Coordinator completes all required §504 forms including the Individual Accommodation Plan (IAP) if student qualifies.
7. Parents are given/sent Consent for Placement in Dyslexia Program for Services.
8. Within 30 instructional days of parental Consent for Placement in Dyslexia Program, instruction in Dyslexia Intervention Program (DIP) begins.

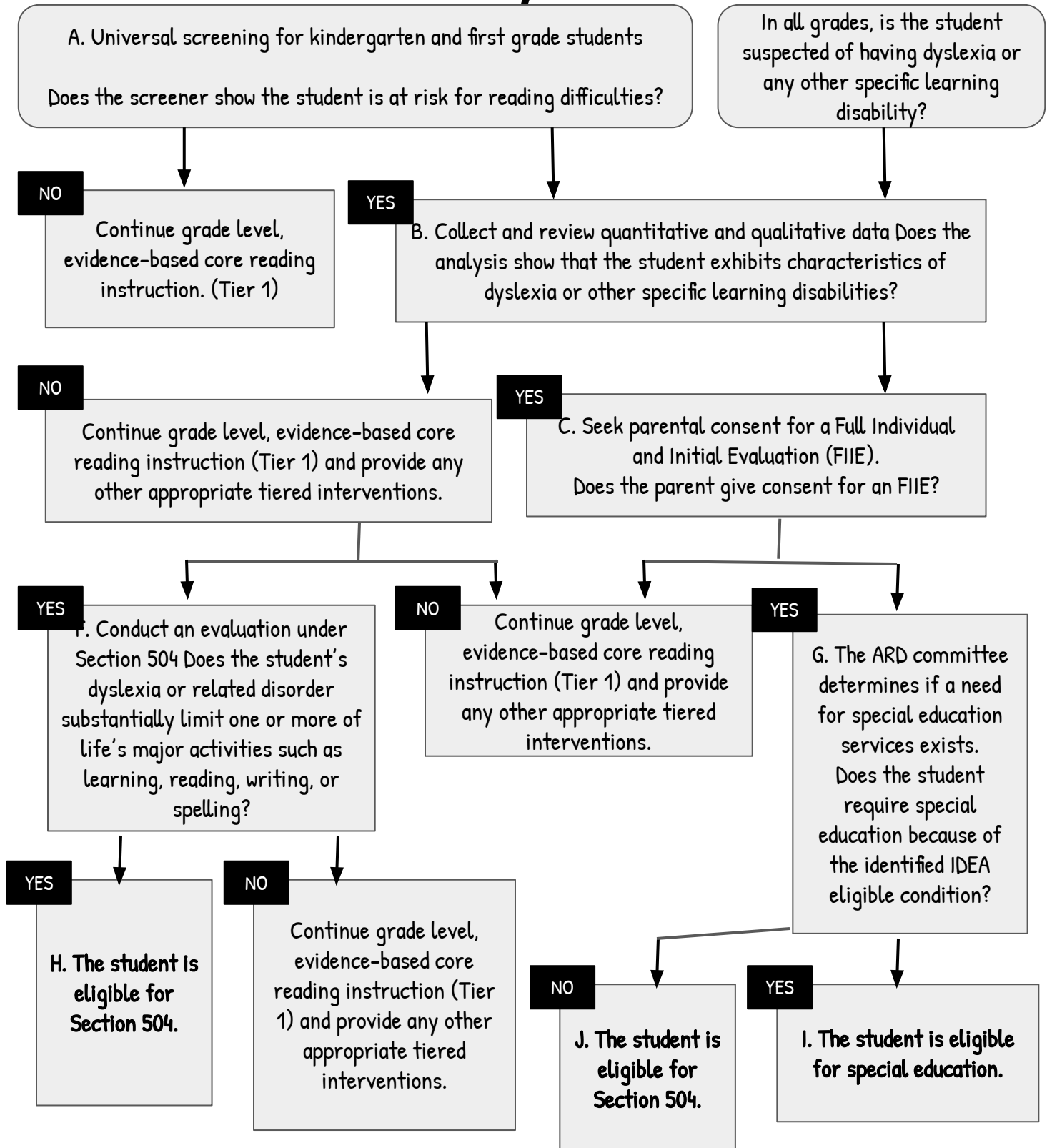
[See the Pathways for Identification and Provisions of Instruction for Students with Dyslexia on page 35 of the Dyslexia Handbook – 2021 Update](#)

In compliance with §504 and IDEA, assessment instruments are approved by the district for identifying for characteristics of dyslexia.

Areas for evaluation are defined below:

Figure 3.4. Areas for Evaluation		
<u>Academic Skills</u> • Letter knowledge (name and associated sound) • Reading words in isolation • Decoding unfamiliar words accurately • Reading fluency (rate, accuracy, and prosody are assessed) • Reading comprehension • Spelling	<u>Cognitive Processes</u> • Phonological/phonemic awareness • Rapid naming of symbols or objects	<u>Possible Additional Areas</u> • Vocabulary • Listening comprehension • Verbal expression • Written expression • Handwriting • Memory for letter or symbol sequences (orthographic processing) • Mathematical calculation/reasoning • Phonological memory • Verbal working memory • Processing speed

Silsbee ISD will follow the TEA Pathway to Identification and Provision of Instruction for Students with Dyslexia Flowchart



Procedures for Students Presenting Outside Independent Evaluations for Dyslexia Services

For students whose parents present evidence of outside independent evaluations addressing dyslexia, the following must be considered:

The outside independent evaluation (assessment) must:

- have been administered by an individual certified to conduct an educational evaluation and knowledgeable about dyslexia;
- be considered valid and comparable to the evaluation standards that Silsbee ISD would conduct; and
- comply with the requirements specified in TEA's, *The Dyslexia Handbook – Revised 2021*.

The Dyslexia Handbook – Revised 2021 have identified certain expectations in regards to the referral process for a dyslexia assessment and/or eligibility. An outside independent evaluation is considered a single source of data. §504 and/or the IDEA both require that ***data must be provided from a variety of sources in determining a child's eligibility*** for services. Case law allows the District to maintain the right to conduct their own evaluation.

Dyslexia Interventionists' Role

Although Texas does not have a certification requirement specific to teachers providing intervention to students with dyslexia, opportunities for those who provide dyslexia instruction to pursue a certification and/or license are available through several professional organizations as well as through the Texas Department of Licensing and Regulation. Certification and licensing options are outlined in Figure 4.1 below. More information concerning licensure in the State of Texas, may also be found in Texas Occupations Code, Chapter 403. (See Appendix C, State Laws and Rules Related to Dyslexia).

Providers of dyslexia instruction may serve as trainers and consultants in dyslexia and related disorders for regular, remedial, and special education teachers. They must also be prepared to use the techniques, tools, and strategies listed below:

- Phonological awareness
- Sound-symbol association
- Syllabication
- Orthography
- Morphology
- Syntax
- Reading comprehension
- Reading fluency

Delivery of instruction must include all of the following:

- Simultaneous, multisensory (VAKT)
- Systematic and cumulative
- Explicit instruction
- Diagnostic teaching to automaticity
- Synthetic instruction
- Analytic instruction

Dyslexia Parent Awareness

Texas administrative Code 19 TAC §74.28(h) states:

(h) Parents/guardians of a student with dyslexia or a related disorder must be informed of all services and options available to the student, including general education interventions under response to intervention and multi-tiered systems of support models as required by TEC, §26.0081(d), and options under federal law, including IDEA and the Rehabilitation Act, §504.

Instructional Services

Once a student is identified with dyslexic characteristics, there are several courses of action available for use depending on the needs and accommodations of the individual student.

- Instruction in the regular classroom with accommodations by the regular education teacher
- Instruction in the regular education classroom with accommodations by the regular education teacher coupled with instruction by a dyslexia specialist in a pull-out classroom setting.
- Special Education instruction if the student qualified for special education
- Any accommodations should be based on the student's individual needs for the disability of dyslexia
- Interventions in reading based on student's individual needs for the disability of dyslexia.

Components of Pull-Out Instruction

The intervention program should be offered in a small group setting and include reading, writing, and spelling as appropriate for each student. The major instructional strategies should utilize individualized, intensive, and multi-sensory methods as appropriate.

Components of instruction, as appropriate for the reading needs of the student, include the following:

- Phonemic awareness instruction that enables students to detect, segment, blend and manipulate sounds in spoken language;
- Graphophonemic knowledge (phonics) instruction that takes advantage of the letter-sound plan in which words carry meaning are made of sounds and sounds are written with letters in the right order. Students with this understanding can blend sounds associated with letters into words and can separate words into component sounds for spelling and writing;
- Language structure instruction that encompasses morphology (the study of meaningful units of language such as prefixes, suffixes, and roots), semantics (ways that language conveys meaning), syntax (sentence structure), and pragmatics (how to use language in a particular context);
- Linguistic instruction directed toward proficiency and fluency with the patterns of language so that words and sentences are the carriers of meaning;
- Strategy-oriented instruction in the strategies students use for decoding, encoding, word recognition, fluency, and comprehension that students need to become independent readers

Instructional Approaches

Instructional approaches, as appropriate to meet the instructional needs of the student, include:

- Explicit direct instruction that is systematic (structured), sequential, and cumulative. Instruction is organized and presented in a way that follows a logical sequential plan, fits the nature of language (alphabetic principle) with no assumption of prior skills or language knowledge, and maximizes student engagement. This instruction proceeds at a rate commensurate with students' needs, ability levels, and demonstration of progress;
- Individualized instruction that meets the specific learning needs of each individual student in a small group setting; a reading curriculum that matches each student's individual ability level
- Intensive, highly concentrated instruction that maximizes student engagement, uses specialized methods and materials, and produces results;
- Meaning-based instruction that is directed toward purposeful reading and writing, with an emphasis on comprehension and composition;
- Multi-sensory instruction that incorporates the simultaneous use of two or more sensory pathways (auditory, visual, kinesthetic, tactile) during teacher presentations and student practice.

Coordination

Planning and coordination meetings occur throughout the year between the dyslexia teacher, classroom teacher and/or the dyslexia coordinator to discuss:

- Students problems, progress and concerns
- Changes in modifications and accommodations
- Curriculum or instructional strategies

Program Exit Criteria

Student will need to demonstrate Silsbee ISD Exit Criteria and a committee will determine if the student is eligible for program exit and monitor status.

Program Evaluation

Student success in the dyslexia program is evaluated and measured by daily observations and evaluations by the dyslexia Interventionist, classroom teacher feedback, 6 week progress reports from the regular education program, and in-program mastery checks (progress monitoring). State Assessment scores are used to measure progress as well as an evaluation of strengths and weaknesses.

Silsbee ISD recognizes the value of continual assessment and evaluation of programs in increasing the effectiveness and quality of those programs. Consequently, SISK will evaluate all aspects of the Dyslexia Program annually. Results of the evaluation will be shared with the district Site-Based Decision-Making Committee, which includes staff members, parents, and other community representatives, for review and recommendations.