1(C) The curriculum must provide concise, direct, explicit, and systematic phonics instruction with cumulative review.
- Materials lack concise, explicit instruction in phonics skills. Materials follow a workshop model in which the teacher primarily guides students to notice and discuss phonics skills rather than directly modeling and applying them.
- Much of the teacher scripts include prompting students to share what they notice and building community and confidence as readers. The teacher's guide lacks teacher scripts for how to introduce, model, facilitate practice, and assess phonics skills.

1(D) The curriculum must provide specific daily instructional sequences and routines, which include modeling, guided practice, and application with immediate, corrective feedback.
- Materials do not follow a gradual release model. Materials follow a workshop model in which the teacher delivers a mini-lesson, engages students on the rug, and then releases them to practice individually and with partners. Materials do not consistently provide modeling, guided practice, and application of phonics skills. Materials include a 20-minute mini-lesson that provides some but not all elements of the gradual release model. The teacher introduces the teaching point following a narrative/descriptive script and then shows students through guided examples.
- Materials direct teachers to "rally," "activate," and "engage" students by making connections to a phonics skill and then to "launch" them into practice without first directly instructing them in the skill.
- Materials provide coaching tips that guide teachers to provide corrective feedback to students practicing individually and with partners.

1(E) The curriculum must include ongoing practice opportunities in isolation and in connected, controlled text that follows the instructional focus.
- The “Decodable Guide” explains that the program’s readers follow a scope and sequence aligned to the phonics progression in The Units of Study in Reading but that most phonics programs also follow this progression. These decodables are not specifically referred to or used for practice within The Units of Study in Phonics. They are designed to supplement reading programs.
Heinemann Units of Study Grades K-2
Compliance with 19 TAC §74.2001 Rule 1(C)–1(G)

- Materials lack opportunities to practice recently taught skills in isolation and in controlled (decodable) text. For example, students practice short vowels with the names of students in the class. Many names are not decodable, and there is no way to control the list of names since teachers are instructed to use their students’ names.
- The K-1 materials include “Jump Rope Readers.” These are decodable texts that include grade-level high-frequency words and sound-spelling patterns.