3(A) The program may not teach word recognition, when teaching students to read in English, through visual memory, guessing, the shape of a word, or the use of pictures or context clues to decode words instead of explicitly teaching words that cannot be sounded out and that do not follow the rules of phonics.

- In grades K-2, students are introduced to words by the number of letters in the words when teaching high-frequency words. The routines in these lessons tell the teacher to point out which letters are in words. Students are taught to memorize the words. There is no instruction to apply decoding or phonics skills, even though many of the words in these lessons are decodable.

- Grades K-2 do not provide explicit instruction for connecting the letter name to sounds. Students are ultimately taught to sort words by the beginning letters and play concentration games to memorize the words. Although there are instances in writing instructions where teachers remind students to use their phonics knowledge to spell a word they cannot spell on their own during independent writing practice, guidance is not provided for helping students who come across an unknown word during reading.

- In third grade, students are explicitly taught to recognize parts of the words they know. However, the words’ decodable parts and non-decodable parts are not discussed. To remember the words, students use magnetic letters to make and remake the words with magnetic letters.