

IN THE SUPREME COURT OF THE STATE OF IDAHO

COMMITTEE TO PROTECT AND PRESERVE
THE IDAHO CONSTITUTION, INC.;
MORMON WOMEN FOR ETHICAL
GOVERNMENT; SCHOOL DISTRICT NO. 281,
LATAH COUNTY, STATE OF IDAHO; IDAHO
EDUCATION ASSOCIATION, INC.; JERRY
EVANS; MARTA HERNANDEZ; STEPHANIE
MICKELSEN; ALEXIS MORGAN, on behalf of
herself and her minor children; KRISTINE
ANDERSON, on behalf of herself and her minor
children; each of the foregoing individually and as
private attorneys general on behalf of the public of
the State of Idaho,

Petitioners,

vs.

STATE OF IDAHO, acting by and through the
IDAHO STATE TAX COMMISSION,

Respondent.

Docket No. 53264-2025

DECLARATION OF KRISTINE MORIARTY

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Attorneys for Respondent

I, Kristine Moriarty, hereby declare and swear as follows:

1. I am over 18 years of age and am competent to make this declaration.
2. Since August 2023, I have served as the Policy Director at the Idaho State Department of Education (“Department”).
3. In my capacity as Policy Director, I have personal knowledge related to Department regulations, policies, and structure, as well as familiarity with Idaho education laws.
4. On a regular basis, I meet with Debbie Critchfield, the Idaho Superintendent of Public Instruction, to discuss Department goals, policy implementation, and other related topics.
5. As the state agency tasked with supporting K-12 education in Idaho, the Department is committed to helping students achieve academic success. One such effort relates to enhancing early literacy education. The Department delivers high-quality professional development, instructional techniques, and resources to Idaho educators in reading, writing, speaking, listening, and effective language use.
6. There are 116 school districts throughout Idaho.
7. Among these districts, every home in Idaho is zoned to attend an elementary and secondary school—affording every Idaho school-aged child the opportunity to attend a public, free common school at every K-12 grade level.

8. The Idaho Board of Education (“Board”) sets content standards and graduation requirements, approved by the Idaho legislature, that every public school must meet.
9. The Board, federal law, and Idaho law require every public school to administer certain academic assessments throughout the year. These assessments allow the Board and Department to determine whether Idaho students are achieving academic success.
10. Each spring and fall, Idaho public school students in kindergarten through third grade take the Idaho Reading Indicator (“IRI”) as required by Idaho Code section 33-1806. The assessment helps Idaho educators better understand the needs of early learners in phonics, phonemic awareness, fluency, vocabulary, and reading comprehension. The spring 2025 IRI data demonstrated that statewide:
 - a. Proficiency rose from 66.5 percent in spring 2024 to 71 percent in spring 2025.
 - b. Overall proficiency increased eleven percent from fall 2024 to spring 2025.
 - c. Kindergarteners reading at grade level increased thirteen percent, from 66 percent in spring 2024 to 79 percent in spring 2025.
 - d. First-grade students reading at grade level increased three percent from spring 2024 to spring 2025.

11. To ensure quality classroom instruction, and that each Idaho student learns from a competent, qualified, and ethical educator, every Idaho public school educator and administrator is required to complete an approved educator preparation program that culminates in certification.

* * *

I certify under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

DATED: November 10, 2025.

By: 
KRISTINE MORIARTY

CERTIFICATE OF SERVICE

I certify that on November 10, 2025, I filed the foregoing electronically through the iCourt E-File system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notification of Service:

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