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IRRC

Mr. David Sumner  
Executive Director, IRRC  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Reference: IRRC #2976

Dear Mr. Sumner:

After months of extensive research into the Common Core “State” Standards initiative (CCSS -- recently renamed “PA Core Standards”), I am becoming increasingly concerned with regard to its unquestionable deleterious consequences on our students and our educational system, and also its fiscal impact on Pennsylvania’s fragile economy. In listing the various reasons why I oppose the CCSS, I speak from the perspective of a retired educator who has taught at the university level for decades and also as the grandmother of four public school students.

#### Fiscal Issues

Although my personal primary concern of this transformational, untested initiative is the loss of local control, I shall first address the fiscal aspect since it is crucial that legislators and regulatory agencies understand the enormous fiscal impact that Common Core will impose on Pennsylvanians. The initial costs and ongoing execution of the CCSS will be prohibitive, resulting in massive unfunded mandates at a time when our Commonwealth is facing severe budgetary problems, including an exponentially expanding pension crisis. Initial and continuing costs for implementation will involve hiring countless additional staff, extensive training of both new hires and current teachers, purchasing new instructional materials and technology equipment, developing and aligning curriculum to the CCSS, providing remediation and project-based assessments, and administering and grading the innumerable mandated assessments, some of which will include essay and open-ended response items. Many of these costs will undoubtedly be the responsibility of local districts.

A major fiscal concern involves the **Keystone exams** which, under the CCSS Chapter 4 regulations (*General Provisions for Academic Standards and Assessments*), will be required for graduation (Algebra I, Literature, and Biology, with more to be added in later years). Students who don't pass these exams can repeat them until they do. Those who continue to fail them must be remediated and/or given project-based assessments, which will undoubtedly prove to be exceptionally costly, particularly in the poorer districts.

It is astounding and inexcusable that no fiscal impact study was undertaken before PA signed on to the CCSS in July of 2010, but it is even more reprehensible and unfathomable that no complete fiscal analysis has been forthcoming to date, even though legislators have repeatedly requested this information from the PA DOE.

The Pioneer Institute and the American Principles Project estimate that the cost of implementing the CCSS in PA over the next seven years will be \$645 MILLION. Although this high figure has been disputed, the PA DOE themselves, in their initial requests for Race to the Top funding from the Federal Government (*a document that can be obtained on-line*), stated that, along with the federal dollars being requested, it would require an ***“ongoing phase-in of \$2.6 BILLION to districts in new state monies,”*** to implement Common Core. The PA DOE stated specifically to the Feds that these amounts ***“are both necessary and sufficient to meet and sustain the ambitious goals summarized in our application.”*** Legislators and regulatory agencies ***should*** be aware of these enormous cost estimates that were presented to the federal government by the PA DOE in 2010, but ***are*** they?

An issue that should be addressed by the IRRC is the fact that the same PA DOE that cited the \$2.6 BILLION price tag to the Feds (noted above), said in writings in 2012 that the implementation was going to be “cost-neutral.” The “cost-neutral” aspect was at that time disputed by the IRRC. How could they have cited this high figure to the Feds in 2010 and then stated in 2012 that it would be cost-neutral? Perhaps there is a rational explanation, but this disparity is very hard to understand!

### **Misrepresentations and Misleading Statements re: the CCSS by the PA DOE**

In my opinion, the adjectives used by the PA DOE to describe the CCSS, namely, ***“VOLUNTARY”*** and ***“STATE-LED,”*** are deliberately misleading. Deception of this sort tends to lessen the credibility of any other statements that the obviously biased PA DOE makes with regard to this initiative.

**“State-Led”????** The National Governor’s Association (NGA) and the Council of Chief State School Officers (CCSSO, *which represents state education commissioners*), in partnership with Achieve, initially led the creation and execution of the CCSS. In spite of their official sounding names, the NGA and the CCSSO are essentially ***trade organizations*** who received huge grants from special interest groups and corporations, many of which will profit from the implementation of the CCSS. Achieve is a nationwide education reform organization that, according to its own web site, currently “provides technical assistance to states in their standards, assessments, curriculum and accountability systems.” Its web site also notes that Achieve has provided “Common Core ‘boot camps’ to a number of states in the Network to support implementation efforts.”

**“Voluntary”????** At a time when the country and individual states were undergoing a calamitous fiscal crisis (2010), the federal government offered strong incentives (*bribes*) for states to adopt the CCSS. Stimulus funds and the possibility of “opting out” of the ***extremely unpopular*** “No Child Left Behind” (NCLB) were offered to states as an enticement to adopt the Common Core standards. A state could not get “Race to the Top” stimulus money unless they signed on to the standards. Indeed, a major fiscal concern of the states is that the ***CCSS will lead to Title I monies being withheld from low income schools*** if the federal government isn’t satisfied with a state’s compliance to the CCSS standards.

Diane Ravitch, a former assistant U. S. Secretary of Education under both Bill Clinton and GHW Bush (*and a former CCSS supporter*), disputes the contention that the CCSS are “state-led,” saying: ***“President Obama and Secretary Duncan often say that the Common Core standards were developed by the states and voluntarily adopted by them. This is not true. They were developed by an organization called Achieve and the National Governors Association, both of which were generously funded by the Gates Foundation. There was minimal public engagement in the development of the Common Core. Their creation was neither grassroots nor did it emanate from the states.”***

**The PA legislature was bypassed completely in the decision to implement CCSS in PA.**

The PA State Board of Education (*an unelected committee*) “adopted” federally-controlled CCSS in math and English (ELA) on 7/1/2010 with an effective date of putting them into place of 7/1/2013. Standards for other subjects (*science, history, etc.*) were to be added later.

Although writings by the PA DOE lead one to believe that this initiative was widely publicized to the public and to legislators, and particularly to those on the Education Committees, the opposite seems to be true. Although the PA legislature has the “power of the purse,” they were not provided with any fiscal analysis of this initiative (*as is noted above*). After attending several official meetings and hearings on Common Core over the last several months and speaking to various legislators, I have no doubt that *most* legislators, including many on the Education Committees, were virtually clueless until just recently as to the particulars of this initiative and its potential deleterious budgetary and educational impacts on Pennsylvanians. Just as egregious is the fact that few parents, school board members, and taxpayers understood or were aware of the transformative educational implementation that was to begin in our schools in July of 2013.

*Finally*, just a few short months before full implementation was set to occur, hearings were held in Harrisburg which enabled proponents and opponents to present their cases to the legislature. It is ***inexcusable*** that public hearings such as this were not held ***before*** PA signed on to the CCSS and began the expensive process of implementing them!

**One has to wonder why this transformational initiative was kept under the radar for so long.** Emmett McGroarty, a CCSS opponent, provides the most reasonable explanation: ***“The NGA (Nat. Governor’s Assn.) wanted to implement its plan quickly and avoid the tedium of the democratic process. If given the chance, the people – through their elected representatives – might muck around with, or reject, NGA’s eventual product.”*** The fact that an *unelected* committee such as the PA DOE made such a momentous decision with little if any input from our *elected* officials in the State Legislature and from Pennsylvania’s citizens is a subversion of the democratic process.

**Federal Control Means...**

**Lessening or Loss of Influence of Parents and Local School Boards on the Educational Process**

**Participating CCSS states must align 85% of their standards with the National CCSS with only 15% flexibility.** This imposition of federal control will lessen or eliminate the influence of parents, teachers and local school boards in providing a curriculum tailored to their individual students’ needs.

Although the PA DOE insists that the CCSS is state-led and state-controlled -- even to the point of their using a *marketing technique* of changing the name from “Common Core State Standards” to “PA Core Standards,” the fact remains that ***PA received money from the federal government*** in RTTT funds and ***that money has stipulations attached***. Although theoretically it is only *standards* that PA has to align with national standards, these standards are tied to curriculum and assessments. The federal government will be able to effectively control the Common Core curriculum by virtue of the fact that the results of the assessments that are based on the relatively inflexible CCSS standards are tied to funding.

Maggie Gallagher, a Fellow at the American Principles Project, states: ***“Common Core advocates continue to insist that Common Core does not usurp local control of curriculum, but in practice high-stakes tests keyed to the Common Core standards ensure that curriculum will follow...Once a state adopts Common Core, its curriculum goals and assessments are effectively nationalized. And the national standards are effectively privatized, because they are written, owned, and copyrighted by two private trade organizations (NGA and CCSSO).”***

Joseph A. Califano, Jr., former Secretary of Health, Education, and Welfare, wrote, ***“In its most extreme form, national control of curriculum is a form of national control of ideas. Unfortunately, in three short years, the present administration has placed the nation on the road to a national curriculum.”***

**The CCSS was neither field-tested nor validated before states (including PA) signed onto it.**

There is no empirical evidence that implementation of the CCSS will improve our educational system or learning outcomes. Diane Ravitch, a proponent-turned-opponent, in an article entitled: *“Why I Cannot Support the Common Core Standards,”* stated: ***“The Common Core standards have been adopted in 46 states and the District of Columbia without any field test. They are being imposed on the children of this nation despite the fact that no one has any idea how they will affect students, teachers, or schools. We are a nation of guinea pigs, almost all trying an unknown new program at the same time.”***

The U.S. Food and Drug Administration wouldn't consider allowing the distribution of a drug to the general populace without extensive field-testing. Why should our students be guinea pigs in a pricey educational experiment to determine whether the latest educational design works?

**There is far too much focus and time spent on assessments.**

A West Chester school board member told me that 17 days will be spent on assessments this year in our school district; other local school districts have reported even more testing days. The excessive focus on assessments and their influence on evaluations will put tremendous pressure on teachers to use their 15% “flexibility” to ***teach to the test -- an educationally unsound practice*** -- instead of providing unique and interesting supplemental modules that establish a love of learning in their students. Many have opined that the Common Core initiative will resemble the vastly unpopular “No Child Left Behind” on steroids!

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There are many other concerns that I have with regard to the CCSS that are equally as important as those noted above. One is the ***data mining of students*** and another is the ***potential for indoctrination*** in subjective areas such as social studies and science when the federal government is in control. I'm sure that other individuals will provide detail for these consequential issues.

It is unfortunate and unconscionable that too many proponents of Common Core support this initiative because of the financial benefits that they will receive from its implementation. In spite of pressures from these sources, I hope that our legislature and regulatory agencies will come to their senses and see that it was a huge mistake to sign on to the CCSS and effectively “sell our souls” to the Feds.

Although the PA DOE has been lobbying tirelessly to convince everyone that it is Pennsylvania and not the federal government that is in control, the fact that PA has taken money from the Feds with stipulations attached invalidates their contentions in this regard. Unless we return the money from the RTTT grant to the Feds, refuse any more of their money, and obtain a written release, the state of PA will not be in control! It is disappointing that Governor Corbett has recently applied for additional grant money for early childhood education. This further entangles us in the web of national control.

I strongly urge the IRRC to thoroughly investigate the issues that are being presented to you by concerned citizens. I sincerely hope you can stop the implementation of this disastrous initiative before we are so entwined that we cannot disentangle ourselves from it. Our children must not be used as guinea pigs in an educational experiment!

Respectfully,



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***So much time is wasted on compliance that little remains to pursue excellence.***