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**From:** Frances Fulton <frannie.fulton@yahoo.com>  
**Sent:** Thursday, October 31, 2013 12:29 PM  
**To:** IRRC  
**Subject:** Re: Public Comment Period for the Chapter 4 Regulation ( State Board of Education)

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To: The PA Independent Regulatory Review Commission  
Re: Public Comment Period for the Chapter 4 Regulation ( State Board of Education)

The Common Core State Standards, now being called the PA Core Standards, were foisted on our local schools with little public scrutiny or debate. The PDE insists it held public meetings across the state, but we cannot find meeting meetings or information on who attended the meetings and how they were announced to the public.

The PDE insists that they are not following national standards but Common Core standards that are unique to PA. Are we expected to believe that it is just coincidence the name was changed from Common Core to the PA Core but these PA standards are not Common Core? Why were they even called Common Core in the first place? This name game fails to instill confidence in the integrity of process or the procedures that led to the adoption and/or adaptation of Common Core in the state of PA.

An analysis of the "customization" that PDE did to create the "PA Common Core" (now the PA Core Standards) revealed that some of the "changes" simply involved moving numbered items around so an item that is #1 on the privately owned and copyrighted standards that Governor Rendell agreed to adopt, as written, is put in the #3 spot on the PA standards, or a thesaurus was used to come up with the synonym for a word used in the national version. So they can claim they're not "the same" and I guess demonstrate how the state is "allowed" to make changes.

And we're told ad hominem how very, very rigorous these standards are. The term rigorous, in Common Core language, does not mean rigorous as in 'AP calculus is rigorous,' but instead it means that lots of effort is required. Semantic deception is prevalent these days. Common words and phrases that are understood to mean one thing are used to promote and advocate for something entirely different. Requiring lots of effort does not necessarily equate to a more effective way to teach. In fact, making simple concepts rigorous can actually frustrate young learners and turn them off to learning.

Over and over again we hear the Common Core buzzwords: *robust ... rigorous ... deeper understanding ... higher level learning ... competing in the global economy ... 21st century workplace ... college-and- career-ready*. Such buzzwords thinly disguise an agenda of replacing the objective measurement of knowledge and skills with subjective appraisals of students' attitudes and behavior. First we were told the Common Core was internationally benchmarked, but when asked to provide evidence, the language was changed to state that the standards are "informed by" the standards of other countries. What does that mean?

There is an unusual emphasis on the workforce underlying Common Core. David Patti, President and Chief Executive Officer Pennsylvania Business Council states "Business leaders support common core as the best way to ensure a future workforce available anywhere in the United States able to compete on a global scale." Who exactly does PA consider the "customers/ stakeholders" of education—parents or the business community? And why is it the job of education to prepare children for the workforce instead of just teaching them what they need to know to be responsible informed citizens who will make their own way in the world. Common Core seems to approach our children, and the term has actually been used, as human capital and not unique individuals who group up with different passions and abilities.

Those of us who oppose Common Core have legitimate questions about it, including questions about data collection, technology, assessments and cost to our already cash strapped districts. Federal Privacy Law (FERPA) was changed, without a Congressional vote, to remove the obstacle of parental consent for third parties, including bureaucrats in the federal government, to access data, data that extends well beyond academic achievement/ records to include

"psychometric" data about our children. These new Chapter 4 regulations claim not to collect any "new data" but how was the PDE able to get out of the agreement to create this database and collect this data without giving back the federal taxpayer money?

In the South Eastern School District's Summer 2013 edition of the RAM'S HORN newsletter, the following wording appears in the 3rd bullet point under the section called FERPA detailing privacy rights under this law: "The right to privacy of personally identifiable information in the student's education records, *except to the extent that FERPA authorizes disclosure without consent.*"

Common Core isn't just about opposing "the standards," but also about the baggage that comes with them. And it is pretty heavy baggage.

Tests and assessments are aligned with Common Core. Textbooks are aligned to Common Core. Popular education websites used by teachers are aligned to Common Core. How can teachers not teach something that they know is going to be on a high stakes (both for teacher and students) tests? Therefore, Common Core will influence curriculum & lesson plans, despite any reassurances from the PDE that it cannot dictate curriculum or lesson plans and it has no control at the local level beyond the standards themselves. While in theory this may be true, in practical application Common Core, by its very nature, profoundly influences curriculum decisions. And teaching to the test will continue to be our education policy in order for schools not to be considered failures. We are creating a system for which there is no escape. Our local school districts no longer have control over education. Parents and citizens no longer have a voice in the education of their children.

Bill Gates has spent millions upon millions developing, promoting, and supporting the implementation of Common Core. Thanks to a myriad of problems that no one in our legislature seems to be able to fix, our States have run out of money to pay for public education. I have nothing against Bill Gates' success in the business community, but have we have abdicated PA's constitutional obligation to "maintain and support a public system of education" to private corporate interests who do not even have a background in education policy? Bill Gates himself has even said "*It would be great if our education stuff worked, but that we won't know for probably a decade.*" Excuse me? That "stuff" he's tinkering with affects the growth, development and future of our children.

Common Core is education without representation. There was no vote in Congress. Our state legislators were blind-sighted by it. And their response to questions about Common Core is to send the PA DOE "white paper." They cannot defend it on their own. And some have resorted to mock and ridicule to discredit those who find serious and legitimate concerns with both the manner in which these national standards have been implemented and their influence on the education for our children.

Common Core seems to focus more on training, not teaching and using computerized assessments that have the capability to test and re-test until the desired answer is achieved. The "desired" answer being that which those designing the tests want it to be, not necessarily what most of us would consider "right." These computerized assessments are problematic as we no longer have a paper record of the questions and answers asked and given with which to verify the tests and the results. Recent testing scandals have shown how administrators were able to go back to the paper records and determine that cheating had occurred. And the cost to implement, maintain, and support this technology is equally concerning. It seems computers and equipment become outdated at such a rapid pace and old platforms are no longer supported as newer systems are developed leaving school districts with additional costs to keep the system functioning properly. Not to mention to cost of internet connection and access, especially in more rural areas. This cannot possibly save money. Additionally, the over emphasis on technology in the classroom is not necessarily a better way for children to learn or conducive to a healthy learning environment.

Early childhood education experts have expressed concern that the standards are developmentally inappropriate, especially for K-3 education. Knowledge must be taught when children are mature enough to understand and absorb and reflect on what they are learning. Common Core fails to recognize the unique nature of the individual and disparities in learning. In March 2010, the Gesell Institute on Human Development released a statement to that included the following:

*The core standards being proposed by the National Governors Association and the Council of Chief State School Officers are off the mark for our youngest learners ... The proposed standards for Kindergarten through grade 3 are inappropriate and unrealistic. Policy must be set based on hard data and not on unrealistic goals surrounding test scores.*

Learning to read and write sentences may seem like “rigorous” concepts for Kindergarten, and some kids might be able to meet these standards, but each child develops and learns at his own pace. Some children learn to read before age 4 while others just not ready by age 5 or 6. I would refer you to what is going on in New York to see the mess Common Core is creating with early learners. Should it be considered a failure of the part of either the teacher or the student if a child cannot achieve a particular standard in the designated time frame simply because they are not developmentally ready? It would be like demanding that all parents have their child walking by age one or that all children run a mile in 10 minutes. This is unrealistic and unfair to our children and their parents. And it certainly isn’t fair to our teachers. It is unfortunate that there were no early education experts included on the panel that developed Common Core or perhaps their concerns might have been addressed. And do our schools have the resources to assist children who are unable to meet the standards to give them the support they need to achieve what we are asking of them? And how will the PDE handle disparities among school districts where some districts can afford remediation while other districts simply fail children and have them repeat a grade?

Why must such grand ideas be mandatory, instead of allowing exposure to the light of day and the results to speak for themselves? Why aren’t these education elites required to prove their claims with pilot studies that would actually test the standards first, instead of using our children as guinea pigs for the schemes and dreams of policy wonks and educators who believe they know better than parents and teachers what is best for our children? If the evidence is so overwhelming in their favor, wouldn't schools adopt them voluntarily? The PDE claims the standards are “voluntary.” They are not. Unless the definition of “voluntary,” has been changed to means accepting federal taxpayer dollars that is predicated on doing what the federal government wants the state to do. If Common Core does not remove local control and is truly voluntary, then will individual school districts be allowed to “opt out” of Common Core if it proves unworkable for their district?

How can we adopt national standards without any evidence at all that they will improve achievement, enrich education, and actually help to prepare young people, not for these so-called “jobs of the future,” which cannot possibly be known, but for the challenges of citizenship and life? We don’t approve new medicines or medical treatments this way. We run trials and make sure it does more good than harm before we even bring it out to the public domain. What is the rush with pushing these unknown standards onto our students? It confounds me that this is how we do education policy now – let’s just put them out there, then we can find out what’s in them. And we are testing students based on new “rigorous” standards that haven’t even been in place for any substantial amount of time and teachers have not even been teaching yet. It defies logic.

Thank you for this opportunity to comment on this very important matter.

Sincerely,

Frances Fulton

Concerned Parent who has done her homework

Felton, PA