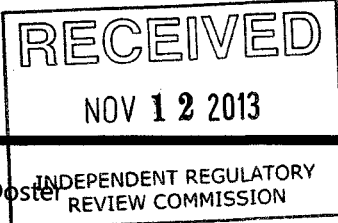


Cooper, Kathy

2976



From: sdoster@councilforstrongamerica.org on behalf of Steve Doster <sdoster@missionreadiness.org>
Sent: Monday, November 11, 2013 1:11 PM
To: IRRC
Subject: Mission: Readiness letter of support re: Chapter 4
Attachments: Mission Readiness Letter to IRRC.pdf; Mission Readiness PA Core Report FINAL.pdf

Good afternoon,

Please find attached a letter signed by Mission: Readiness Pennsylvania members in support of the revised Chapter 4 regulations regarding the Pennsylvania Core Standards and aligned assessments. I ask that you consider circulating this letter and supporting materials to Chairman Lutkewitte and members of the Independent Regulatory Review Commission in advance of the 21 November meeting.

As detailed in the attached report, military leaders believe that the Pennsylvania's Core Standards will help ensure that students are better prepared for success in post-secondary education, the workforce and the military, if they choose to serve. Additionally, the Pennsylvania's Core Standards will help ensure that students are receiving a high-quality education consistently, from school to school and state to state. This is important as a military child will move six to nine times during their Pre-K – 12 education.

Pennsylvania Core Standards is an issue that military members have supported through various avenues, including Mission: Readiness, the Military Child Education Coalition and the Military Interstate Children's Compact Commission.

Please let me know if you have any questions. Thank you in advance.

Best,

Steve

--
Steve Doster
Pennsylvania State Director

Mission: Readiness

PLEASE NOTE OUR NEW ADDRESS
105 North Front Street, Suite 305
Harrisburg, PA 17101
Ph:
(717) 233-1521
Cell: (717) 343-6403
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www.missionreadiness.org

MISSION: READINESS is the nonprofit, nonpartisan national security organization of senior retired military

leaders ensuring continued American security and prosperity into the 21st century by calling for smart investments in the next generation of American children.



2976



11 November 2013

The Honorable Silvan B. Lutkewitte, III
Chairman
Independent Regulatory Review Commission (IRRC)
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Final-Form Regulations #6-326 – Academic Standards and Assessments

Dear Chairman Lutkewitte:

When thinking about military service, most people consider the physical demands. There is good reason for this. Soldiers in Iraq and Afghanistan routinely carry between 60 and 100 pounds of gear including body armor, weapons and batteries.

Equally important, however are the mental demands. Today's Service men and women operate complex high-tech weapons systems and find themselves in intense situations that require not only proficiency in technology, but strategic thinking as well as decisiveness and diplomacy.

With this in mind, it alarming that the Department of Defense reports that poor educational achievement is one of the biggest reasons why an estimated 75 percent of all young Americans are unable to join the military.

On average, one out of five students in Pennsylvania will not graduate from high school. Of those who do graduate and want to join the military, twenty-two percent do not possess sufficient skills to pass the military's entrance exam testing math, literacy, and problem-solving.

This alarming situation has clear implications regarding international competitiveness and was a focus of the recent Council on Foreign Relations task force led by (among others) former Secretary of State Condoleezza Rice. The task force report challenged America's schools to do better "in order to produce citizens who can serve" either in uniform or in the civilian sector.

As retired general officers of the U.S. Armed Forces and members of the national security organization known as Mission: Readiness, we view the implementation of the Pennsylvania Core Standards as an effort to better serve the students of this Commonwealth.

Pennsylvania's Core Standards make English language arts and math education more rigorous and relevant to success in the 21st Century. They challenge students on critical thinking, complex problem solving and effective communication—all essential skills for today's and tomorrow's military.

It is important to note that local school districts and classroom teachers will still decide what specific lessons make up their student's K-12 curriculum.

Just as every good battle plan requires a strategy review, so do education standards. That review comes with standard-aligned assessments, or tests that will ultimately tell us if student achievement is rising. The truthful reporting of these aligned test results and subsequent reforms that would occur will help make our schools more accountable to the student.



Pennsylvania's Core aligned PSSA's and Keystone Exams will serve this purpose.

Student mobility is also of special concern for our nation's roughly 2 million children from military families. On average, a military child will move six to nine times during their Pre-K – 12 education. This can be a frustrating experience as these students often find themselves either ahead or behind their new school peers because of the lack of consistency between different states' education standards.

Pennsylvania's Core Standards will help ensure that students are receiving a high-quality education consistently, from school to school and state to state. In doing so, all students, no matter where they live, or how often they move to a new school, will be better prepared for success in postsecondary education, the workforce and the military, if they choose to serve.

Just as business and industry need a highly qualified workforce to compete in the 21st Century global marketplace, our Armed Forces need the same highly qualified soldiers, sailors, marines and airmen to protect our future national security. Full implementation of the Pennsylvania Core Standards and aligned assessments is an important part of our future national security.

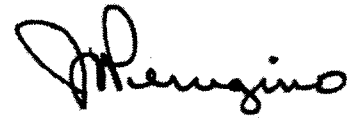
Respectfully Submitted,



William F. Burns
Major General
US Army (Ret.)
Carlisle, PA



Daniel J. O'Neill
Major General
US Army (Ret.)
Honesdale, PA



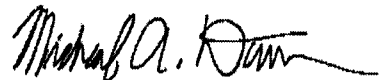
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US Army (Ret.)
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Thomas J. Wilson, III
Rear Admiral
US Navy (Ret.)
Biglerville, PA




Jerry G. Beck, Ph.D.
Brigadier General
US Army (Ret.)
Denver, PA



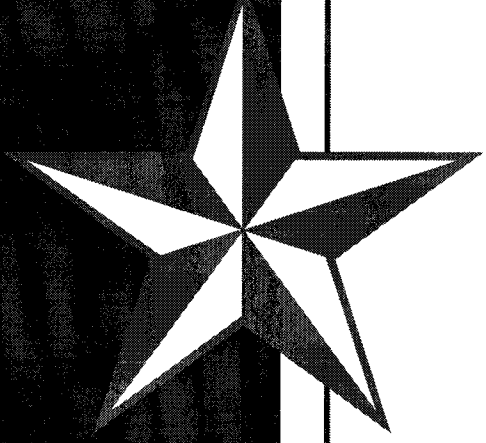
Michael A. Dunn, M.D.
Brigadier General
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US Army (Ret.)
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PA Army National Guard (PA-Ret.)
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All Children Prepared for Success

Pennsylvania Common Core
Standards and Aligned Assessments are Key



MISSION: READINESS
MILITARY LEADERS FOR KIDS



Who We Are

MISSION: READINESS is the nonprofit, nonpartisan national security organization of more than 300 retired generals, admirals and other senior retired military leaders who work to ensure continued American security and prosperity into the 21st century by calling for smart investments in the upcoming generation of American children. It operates under the umbrella of the nonprofit Council for a Strong America.

For a full listing of our membership, please see our website at www.missionreadiness.org.

Acknowledgments

MISSION: READINESS is supported by tax-deductible contributions from foundations, individuals, and corporations. MISSION: READINESS accepts no funds from federal, state, or local governments.

Major funding for MISSION: READINESS is provided by: Alliance for Early Success • The Boeing Company • The California Education Policy Fund • The California Endowment • The Annie E. Casey Foundation • Early Care and Education Funders Collaborative of The Washington Area Women's Foundation • The Grable Foundation • The Leona M. and Harry B. Helmsley Charitable Trust • Robert Wood Johnson Foundation • W.K. Kellogg Foundation • The Kresge Foundation • The David & Lucile Packard Foundation • William Penn Foundation • The Pew Charitable Trusts. The opinions expressed are those of the author(s) and do not necessarily reflect the views of The Pew Charitable Trusts.

This report was written by Sandra Bishop-Josef and Amy Dawson Taggart.

David Carrier, Miriam Rollin, William Christeon, Steve Doster, Chris Beaky, Mike Jayne, David Kass and Soren Messner-Zidell also contributed to this report.



Summary

While there are other major disqualifying factors – including being overweight and having a criminal record – poor educational achievement is one of the biggest reasons why an estimated 75 percent of all young Americans are unable to join the military.¹ Even among those who graduate from high school, in Pennsylvania, 22 percent of those seeking to enlist in the Army cannot join because of low scores on the military's entrance exam for math, literacy and problem solving, according to an analysis by The Education Trust.² These alarming figures raise a critical question: Will shortcomings in our state and local education systems become a threat to national security?

We need enough skilled men and women available to serve in tomorrow's armed services, to ensure the future strength of our military. What happens in our classrooms today will determine our future military readiness. Businesses in the private sector are seeking many of the same skill sets and running into the same challenging deficits. The Common Core State Standards (CCSS) can help ensure that students are receiving a high-quality education consistently, from school to school and state to state, so that all students, no matter where they live, or how often they move to a new school, are prepared for success in postsecondary education, the workforce and the military, if they choose to serve.

For years, each state has had its own particular educational standards and tests to assess student achievement. Standards varied greatly across states. State tests also vary, in content and on the level of performance deemed "proficient." As a result, there is a lot of confusion about how students really are doing. The military has no objective way to compare applicants from different states and has to use its own assessment, the ASVAB, to assess applicants. Also, for children in military families, frequent moves can be unnecessarily

complicated by variations in school standards across different locations, negatively affecting their academic experience.

The CCSS, developed by teachers, researchers and other experts, and led by the nation's governors and chief state school officers, have been voluntarily adopted by the Department of Defense Education Activity, 45 states, including Pennsylvania, the District of Columbia and four U.S. territories. The CCSS establish a shared, rigorous set of educational

standards for English language arts and mathematics for K-12 education. In addition to core academic content, the CCSS focus on critical thinking, complex problem solving and effective communication—all essential skills for today's and tomorrow's military.

But standards alone are not enough. To have an impact on student outcomes, there must be accountability. Standards must be accompanied by assessments, based on the standards, and a system

for reporting results, so everyone will know how students are really faring. If we do not know how students are really performing, we do not know the scope of the problem, nor can we make informed efforts to solve it.

The new educational standards and assessments will not magically turn things around overnight. Because the CCSS are more rigorous than most states' prior standards (including Pennsylvania's), at first there is likely to be a decrease in test scores, compared to previous assessments. But having common standards and accountability through related assessments will move us closer to all students doing well. Pennsylvania is moving in the right direction with its implementation of the Pennsylvania Common Core Standards. We must also implement assessments aligned to the Standards to ensure that all students are prepared for success.

Given the rigor of the CCSS, it is likely that their implementation would result in more military applicants' being able to pass the ASVAB.



All Children Prepared for Success

Pennsylvania Common Core Standards and Aligned Assessments are Key

School Failure is a National Security Threat

Poor educational achievement is one of the biggest reasons why an estimated 75 percent of all young Americans are unable to join the military.³ In Pennsylvania, 22 percent of high school graduates seeking to enlist in the Army cannot join because of low scores on the military's entrance exam for math, literacy and problem-solving.⁴ These shortcomings in our state and local education systems can become a threat to national security. We need enough skilled men and women available to serve in tomorrow's armed services, to ensure the future strength of our military. Businesses in the private sector are seeking many of the same skill sets and running into the same challenging deficits.

Moving Ahead by Raising Educational Standards

For years, each state had its own particular educational standards and tests to assess student achievement. Standards varied greatly across states. State tests also vary, in content and on the level of performance deemed "proficient." As a result, a military applicant's having a high school diploma did not convey much information—a diploma from a state with high standards likely comes with a different skill set than one from a state with low standards.

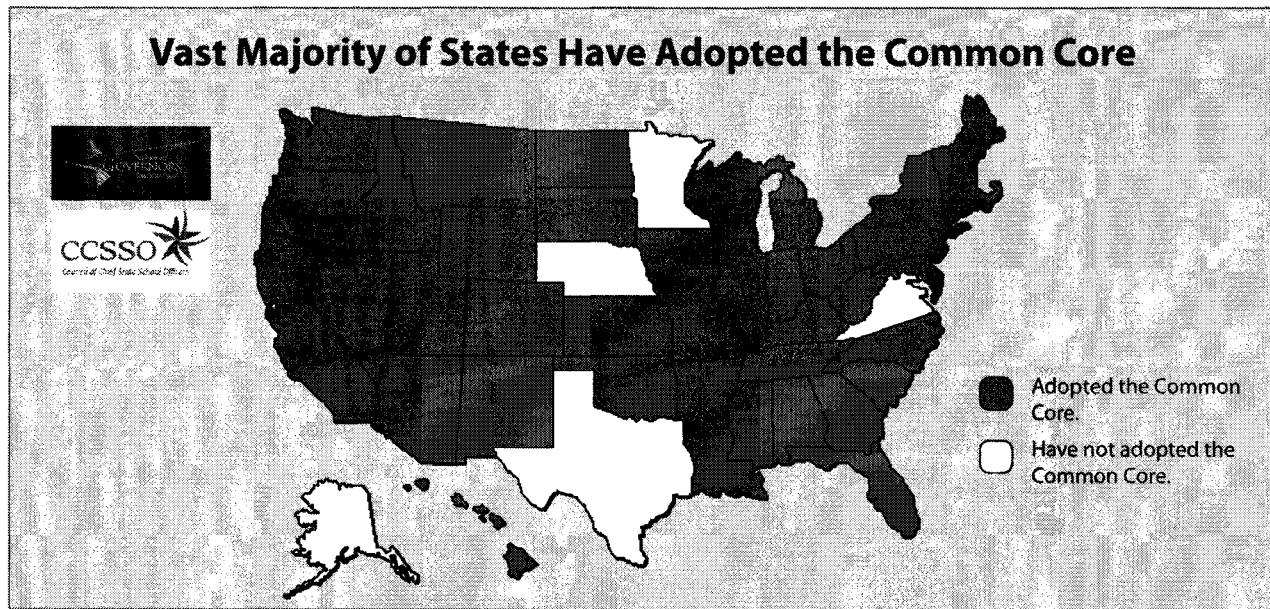
Children in military families are also frequently burdened by variations in educational standards. Military children attend six to nine different schools during their school years.⁵ As

they move between schools, they experience differences in standards and expectations, as well as different assessments, variations that can negatively impact their academic experience and performance. For example, a military child might take algebra for three years in different schools, but never learn geometry.

The Common Core State Standards (CCSS)⁷ offer a way out of these dilemmas. The National Governors Association and the Council of Chief State School Officers spearheaded the development of the CCSS. A wide variety of stakeholders (teachers, academics, business leaders, etc.) participated in the development and vetting of the standards, a procedure that Ron Haskins, a former top staff member for the House Republicans on welfare reform, and other education experts called "impressive."⁸ In Pennsylvania, before adopting the CCSS, the State Board of Education held meetings across the Commonwealth to hear input from teachers, parents and the general public.⁹ The CCSS establish a rigorous, shared set of educational standards for K-12 education, for English language arts (ELA) and mathematics. Existing state standards remain for subjects other than ELA and mathematics. In addition to core academic content, the standards will help students develop higher-order skills, such as critical thinking, problem solving, being able to comprehend and communicate complex text—skills essential for today's and tomorrow's military. The Council on Foreign Relations-sponsored Task Force on U. S. Education Reform and National Security, chaired by Condoleezza Rice and Joel Klein (former head of New York City Schools), argues that states must implement the Common Core State Standards to enhance our ability to defend the country.¹⁰

“Adoption of the Common Core State Standards marks a defining point for our highly mobile students. Consistent standards will enable DoDEA students to stay on track even when their families are moving between the states or overseas.”⁶

Marilee Fitzgerald, Director,
US Department of Defense Education Activity



The CCSS can help teachers ensure their students have the skills and knowledge they need to be successful by providing clear goals for student learning. Although states vary, there are some core skills all children need—reading and math—wherever they live and whatever their career aspirations. The CCSS can help ensure that students are receiving a high-quality education consistently, from school to school and state to state, so that all students, no matter where they live, or how often they move to a new school, are prepared for success in postsecondary education, the workforce and the military, if they choose to serve. Given the rigor of the CCSS, it is likely that their implementation would result in more military applicants' being able to pass the ASVAB. Parents will also benefit from the CCSS, as they will know what their children should learn at each grade level, and can hold schools accountable.

A study by the Fordham Institute found that overall, the CCSS are more rigorous than current English language arts standards in 37 states and math standards in 39 states.¹¹ This is particularly true of Pennsylvania, whose standards for both ELA and mathematics were rated among the lowest in the nation, receiving a "D" for ELA and an "F" for math. The Pennsylvania Department of Education (PDE) was already considering revisions to their standards; a University of Pittsburgh study, commissioned by the PDE, found that the CCSS were aligned with the revisions already under consideration.¹² The CCSS are baseline standards and states could choose to exceed the baseline and /or incorporate some of their own standards (up to 15 percent).

The CCSS establish the content and skills that children must learn at each grade level, but they do *not* tell teachers how to teach, nor do they specify a curriculum; these important

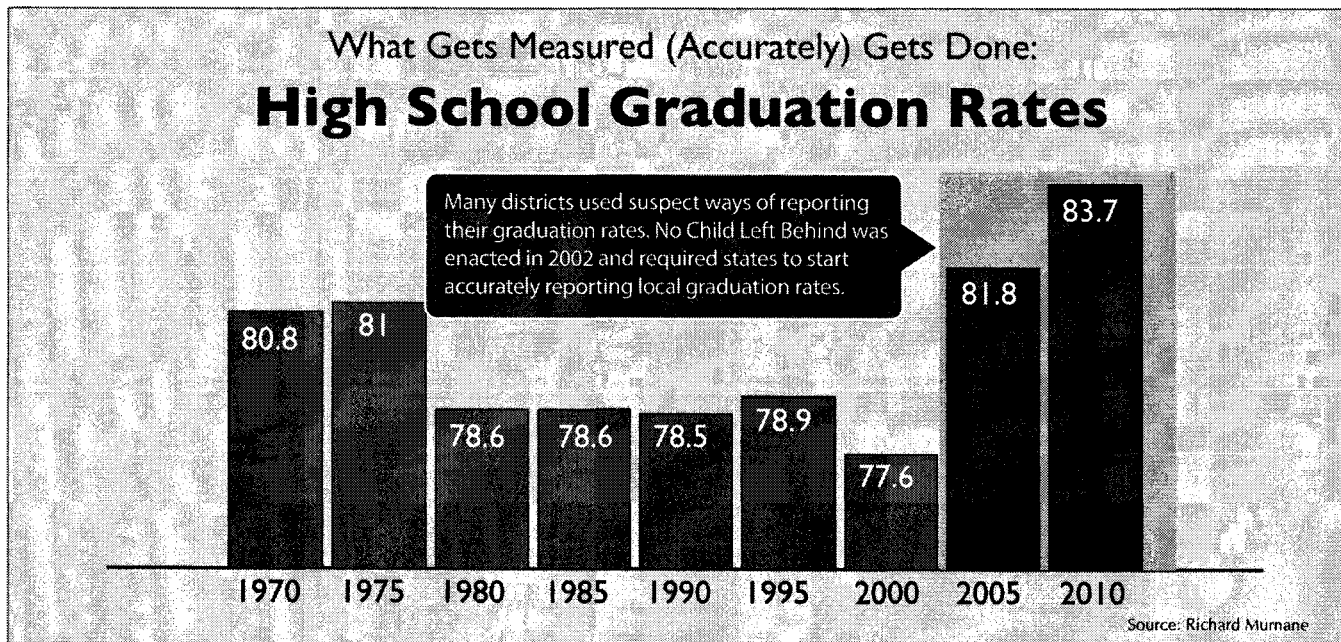
decisions remain under teacher, local or state control. The CCSS also do not require collecting any new data on children or families.

Forty-five states, including Pennsylvania, as well as the District of Columbia, the Department of Defense Education Activity and four U.S. territories (American Samoa Islands, Guam, Northern Mariana Islands and U. S. Virgin Islands),

Why are CCSS so important to military-connected students?

"The education experience for many military-connected students can be frustrating... [because] traditionally [it has] been a patchwork of various standards and expectations as they move from state to state. Some students find themselves in a class where they do not have the expected knowledge and skills needed to do well, skills their classmates learned the previous year. Other students find themselves repeating material and are expected to be content to spend class time 'reviewing.' The adoption and implementation of CCSS are a critical step and particularly important to the mobile military-connected student because they provide consistency, continuity, and clear expectations of the knowledge and skills students need in each grade."

Source: http://www.militarychild.org/public/upload/images/OTM_CommonCore-lres.pdf



have voluntarily adopted the CCSS. Each state has its own process for adopting educational standards; in some states adoption of the standards went through the state legislature, in other states the adoption procedure was through the state board of education. Pennsylvania's State Board of Education voted unanimously to adopt the CCSS in July, 2010.¹³ Implementation began in Fall, 2010, with full implementation by July 2013. Some states, including Pennsylvania¹⁴, decided to adopt the CCSS around the same time they were applying for funds through the Race to the Top (RTT) grant program, although this was not a requirement. Nearly all of the states have moved forward in implementing the CCSS, regardless of their success in receiving RTT funds.

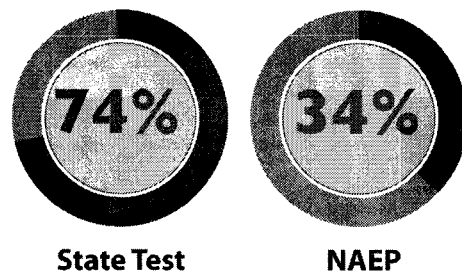
Assessment is Essential

Education experts agree that standards alone are not enough—research has shown only weak relationships between the quality of state educational standards and achievement test scores. To have an impact on student outcomes, there must be accountability. Standards must be accompanied by assessments based on the standards, and a system for reporting results, so everyone will know how students are really faring.¹⁵ There is currently a lot of confusion about student achievement levels, because each state developed its own standards and test. For example, in Pennsylvania, for 4th grade reading, 37 percent of students scored proficient or higher on the National Assessment of Educational Progress (NAEP: The Nation's Report Card, a periodic assessment of what American students know and

can do), versus 72 percent on the state test.¹⁶ If we do not know how students are really performing, we do not know the scope of the problem, nor can we make informed efforts to solve it.

Results following implementation of the No Child Left Behind Act (NCLB) demonstrate the importance of accountability in improving outcomes, and the role of accurate, common measurement: when states were required to use a valid, common method of computing graduation rates and publicly report the results, graduation rates *increased*.¹⁷ States could no longer manipulate how graduation rates were computed in order to maximize their results. Instead, they had to implement real reforms that contributed to a real change in student outcomes: more students graduating.

4th Grade Reading Proficiency



Pennsylvania has developed exams based on the Pennsylvania Common Core Standards (Keystone exams) that high school students must pass in order to graduate (starting with the class of 2017). The Pennsylvania System

of School Assessment (PSSA) will be revised to reflect the Pennsylvania Common Core Standards and continue to be administered to students in 3rd through 8th grade. **These aligned assessments are key, if the Standards are to ensure that all Pennsylvania children are prepared for success.**

Pennsylvania is also a member of two groups of states that are currently developing common assessments based on the CCSS (the Partnership for Assessment of Readiness for College and Career-PARCC¹⁸; and the Smarter Balanced Assessment Consortium—SBAC¹⁹). These assessments will be completed for the 2014-2015 school year. There may be additional benefits to Pennsylvania of adopting one of these common assessments when they are established. The common CCSS assessments will allow educators to determine how students are doing and to use this information to improve education. Short-term assessments will allow teachers to determine students' understanding of various concepts and then adjust teaching in real time, to increase understanding. In the longer term, results of the "apples-to-apples" assessments of student learning, based on the standards, will produce data that will provide educators with a basis for identifying and sharing education practices that work with other schools and districts. The military could also use CCSS assessment scores to compare applicants from different states, as a supplement to the ASVAB.

In addition to standards and assessments, in order to affect student outcomes, we also need better curriculum, compatible with the CCSS, as well as improved quality of teaching (including through better pre- and in-service training).²⁰ Teachers must also receive support in learning how to use assessment data effectively. There are costs associated with these improvements, of course. However, in many states, including Pennsylvania, current spending can cover most of the costs of transitioning to the CCSS.²¹

The new standards and assessments will not magically turn things around overnight. Because the CCSS are more rigorous than most states' prior standards (including Pennsylvania's), at first there is likely to be a decrease in student test scores, compared to previous assessments—difficult news to deliver. But having common standards and related assessments will allow states, districts and schools to share data on what works best, helping each to move closer to all students doing well. For example, different localities will use different curricula and teaching approaches. Assessments will reveal *which* curricula and teaching approaches work best for *which* kids, and information can then be shared.

Moving Ahead

Military leaders understand that in order to get ahead, all students must be held to high standards and learn both the content and skills necessary for success. The CCSS are an important step in this direction and will also benefit children in military families who relocate to new schools frequently. Pennsylvania is moving in the right direction with its implementation of the Pennsylvania Common Core Standards. We must also implement CCSS-aligned assessments, to ensure that students will be better prepared for postsecondary education, the workforce, and the military, if they choose to serve.

Endnotes

- 1 Gilroy, C. (March 3, 2009). Prepared statement of Dr. Curtis Gilroy, director of accession policy in the Office of the Under Secretary of Defense for Personnel & Readiness. Before the House Armed Services Personnel Subcommittee "Recruiting, Retention and End of Strength Overview."
- 2 Theokas, C. (2010). *Shut out of the military: Today's high school education doesn't mean you're ready for today's Army*. Washington, DC: The Education Trust. Retrieved on February 12, 2013 from http://www.edtrust.org/sites/edtrust.org/files/publications/files/ASVAB_4.pdf. Nationally, 22.6 percent of individuals seeking enlistment did not achieve a qualifying score on the Army's entrance exam. In Pennsylvania, 21.6 percent of individuals seeking enlistment did not achieve a qualifying score on the Army's entrance exam.
- 3 Gilroy, C. (March 3, 2009). Prepared statement of Dr. Curtis Gilroy, director of accession policy in the Office of the Under Secretary of Defense for Personnel & Readiness. Before the House Armed Services Personnel Subcommittee "Recruiting, Retention and End of Strength Overview."
- 4 Theokas, C. (2010). *Shut out of the military: Today's high school education doesn't mean you're ready for today's Army*. Washington, DC: The Education Trust. Retrieved on February 12, 2013 from http://www.edtrust.org/sites/edtrust.org/files/publications/files/ASVAB_4.pdf
- 5 <http://www.militaryk12partners.dodea.edu/about.cfm>
- 6 <http://www.edweek.org/media/dodea-educators.pdf>
- 7 National Governors Association Center for Best Practices, Council of Chief State School Officers (2010). *Common Core State Standards*. Washington, DC: National Governors Association Center for Best Practices, Council of Chief State School Officers. See: <http://www.corestandards.org/>
- 8 Haskins, R., Murnane, R., Sawhill, I. V., & Snow, C. (2012, October 2). *Can academic standards boost literacy and close the achievement gap?* Paper. Washington, DC: Brookings Institution, The Future of Children. Retrieved February 20, 2013 from: www.brookings.edu/research/papers/2012/10/02-boost-literacy-haskins-sawhill
- 9 Fact sheet: PA academic standards and the Common Core
- 10 Klein, J. I., Rice, C., & Levy, J. (2012). U. S. education reform and national security: Independent task force report No. 68. New York, NY: Council on Foreign Relations Press.
- 11 Carmichael, S. B., Wilson, W. S., Porter-Magee, K., & Martino, G. (2010, July 21). *The state of state standards—and the Common Core—in 2010*. Retrieved March 15, 2013 from: <http://www.edexcellence.net/publications/the-state-of-state-of-standards-and-the-common-core-in-2010.html>
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- 15 Haskins, R., Murnane, R., Sawhill, I. V., & Snow, C. (2012, October 2). *Can academic standards boost literacy and close the achievement gap?* Paper. Washington, DC: Brookings Institution, The Future of Children. Retrieved February 20, 2013 from: www.brookings.edu/research/papers/2012/10/02-boost-literacy-haskins-sawhill
- 16 Deans, E. (2010, September 8). *Examining the data: Using achievement data to compare state standards*. Retrieved March 15, 2013 from: <http://edmoney.newamerica.net/sites/newamerica.net/files/articles/NCLB-NAEP%20proficiency%20by%20state.pdf>
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- 18 See: <http://www.parcconline.org/about-parcc>
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- 20 Haskins, R., Murnane, R., Sawhill, I. V., & Snow, C. (2012, October 2). *Can academic standards boost literacy and close the achievement gap?* Paper. Washington, DC: Brookings Institution, The Future of Children. Retrieved February 20, 2013 from: www.brookings.edu/research/papers/2012/10/02-boost-literacy-haskins-sawhill
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