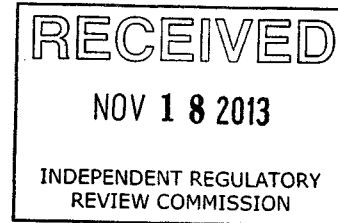


2976

November 17, 2013

Mr. David Sumner
Executive Director, IRRRC
333 Market Street, 14th Floor
Harrisburg, PA 17101



Reference: IRRRC #2976

Dear Mr. Sumner:

Although I have innumerable objections to the implementation of the Common Core "State" Standards (CCSS -- AKA PA Core Standards) initiative and its deleterious consequences for our educational system in Pennsylvania, the testimony herein addresses only the fiscal issues. There is no question that initial costs and ongoing execution 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.

- **FACT:** On page 62 of the initial grant application for Race to the Top (RTTT) funds in May of 2010 (<http://www2.ed.gov/programs/racetothetop/phase2-applications/pennsylvania.pdf>), the PA DOE 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.*"
- **FACT:** A complete fiscal analysis was not performed before the PA DOE committed PA to the CCSS and its consequential mandates in 2010.
- **FACT:** Although the PA DOE in the initial RTTT grant application to the Feds in 2010 stated that it would require an "ongoing phase-in of **\$2.6 BILLION** to districts in new state monies" to implement CCSS, this same unelected committee in 2012 reported that the implementation of the CCSS would be **cost-neutral!** The IRRRC in 2012 disagreed with the PA DOE's "cost-neutral" claim stating that the PA DOE's analysis "*does not adequately address fiscal impacts.*"
- **FACT:** Although the PA DOE has been repeatedly asked for a cost analysis for the implementation of the CCSS from our state legislators, no fiscal analysis was forthcoming when the August 29, 2013 CCSS senate hearing was held, even though the CCSS were already being implemented at that time throughout the Commonwealth. On that date, senators received only polite obfuscations but **no** monetary figures when they attempted to determine the initial and ongoing costs of implementation from the Acting Secretary of Education, Dr. Carolyn Dumesq.

In a brief phone conversation on 9/23/2013, I understood Mr. Peter Tartline, the Executive Deputy Secretary of the Budget, to say that a fiscal analysis is **required** before regulations can be put into place. A fiscal analysis was **not** done when the PA DOE, 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. However, I have been told that foregoing the fiscal analysis is legal if the PA DOE could claim that significant federal funds would be at risk if they didn't act to adopt it.

It is obvious that there are many questions regarding fiscal issues that must be addressed and answered before considering a vote to put the new Chapter 4 regulations in place. At the very least, the following questions should be answered:

QUESTION: When the PA DOE circumvented the requirement to perform a fiscal analysis before adopting the CCSS in July of 2010, did they present documentation to the IRRC that **proved** that significant federal funds would be at risk if they did not adopt the CCSS at that time?

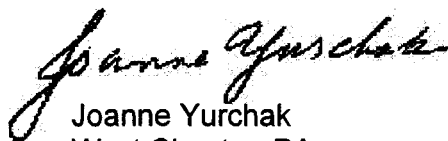
QUESTION: Has the IRRC thoroughly investigated the reasons for the huge inconsistency of the cost estimates for implementation given by the PA DOE, namely \$2.6 BILLION noted in 2010 and "cost-neutral" in 2012? It is absolutely essential that the PA DOE provide a reasonable explanation for this enormous disparity (which some might justifiably consider to be duplicitous) and that their explanations be evaluated by objective experts.

QUESTION: When the IRRC disputed the "cost-neutral" claim of the PA DOE in 2012, why didn't the PA DOE **immediately** initiate a complete fiscal analysis to present to the legislature **before** the CCSS began full implementation in July of 2013?

QUESTION: Has a complete fiscal analysis been presented to date to the IRRC? If so, it is essential that this fiscal analysis be thoroughly evaluated by objective experts, considering past inconsistencies in fiscal reporting from the PA DOE.

I respectfully request that the IRRC thoroughly investigate the fiscal impact of implementation of the Common Core initiative and obtain justifiable answers to the questions above before voting on the Chapter 4 regulations. I concur 100% with the following quote from the testimony of another CCSS opponent who is also concerned about the financial burdens that this untested, transformational initiative will impose on Pennsylvanians: "***The huge costs of implementation of the CCSS will surely have a dire impact on homeowners who are already struggling with high property taxes in this fragile economy. It is quite possible and truly unfortunate that rising taxes will force retirees and young families to give up their homes for an experimental reform initiative that most probably will be deemed a failure in years to come.***"

Very truly yours,



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