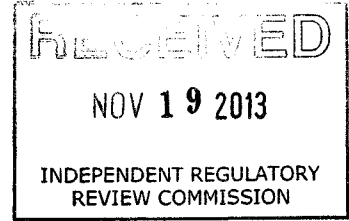


From: mclark@drmatthewclark.com <mclark_1@yahoo.com>
Sent: Monday, November 18, 2013 8:22 PM
To: IRRC
Cc: andy@pasenate.com
Subject: Keystone Examinations



Dear Independent regulatory review commission,

Since the need for the keystone examinations is not at all obvious, I suggest we closely examine who stands to gain from creating the vast infrastructure required to implement these tests statewide. Staff are required to generate the tests, validate the tests, and approve the tests. An army of test creators, reviewers and administrators stand to receive the bulk of the hundreds of million dollars this will cost, which will not improve the education of our children.

There is no information about the governance, structure or funding of the "Pennsylvania Department of Education Standards Aligned System" on their website, <http://www.pdesas.org>. There is a great deal of information about the broad activities and goals, but the identities of the parties responsible for it and the organization used to produce the information are not provided. Why do not at this point have any transparency into who is organizing and operating this effort and what committees are developing the content? Typically one would expect this information to be available either on the department of education or the PA SAS web page.

A Massachusetts group recently estimated that it will require over \$650 million to implement the Keystone Exams. One thing we do know is that these exorbitant funds are **not being spent on the education of our children** - they are being spent on an army of bureaucrats who are being paid to create and administer tests to our children. **There is a vast difference between spending on education, and spending on testing.** The former may improve our schools, the latter will not.

I implore the legislature to allow our duly elected existing school boards to manage our schools, and not develop a duplicative, bloated, state bureaucracy to develop and administer tests.

- Matthew Clark 324 Croton Road, Wayne PA 19087

Cooper, Kathy

From: Parke, Larry <lparke@passhe.edu>
Sent: Tuesday, November 19, 2013 9:39 AM
To: IRRRC
Subject: Oppose Keystone Exams

This is a bad idea, please don't require school districts to implement, thanks.

Larry Parke
Pennsylvania State System of Higher Education Network Operations Center
(at West Chester University)
610-425-5000 x3333

The information contained in this transmission may contain privileged and/or confidential information. It is intended only for the use of the person(s) named above. The sender and intended recipient(s) reserve all rights pertaining to privilege and confidentiality. If you are not the intended recipient, please contact the sender and destroy all record of the transmission in question.



Cooper, Kathy

From: digmail@comcast.net
Sent: Tuesday, November 19, 2013 9:52 AM
To: IRRC
Subject: opposition to Regulation #6 – 326: Academic Standards and Assessment

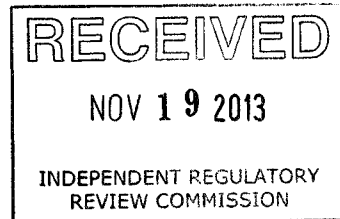
Good morning,

I would like to convey my opposition to Common Core and Keystone Exams. As a proud parent with students in West Chester Area School District, I am saddened that the same factors that have made the School District successful are now being eroded by state bureaucrats. It is the local control that has made the schools successful in educating our children. and engaging the community to participate. We have a richly diverse community that is actively engaged at all levels with the school district to ensure our children have the tools they need. Teachers, parents, school board have worked very well together. They best understand the needs of their community.

The Keystone Exams will doing nothing but distract students. They already have standardized tests. Additional testing that will not produce actionable data. Money spent on the Keystone exams would best be spent by the local school districts.

Keep control of schools local. Reject state and federal bureaucrats.

Thank you,
Brian Brink
Westtown Township
West Chester Area School District



Cooper, Kathy

From: lee.diestelow@comcast.net
Sent: Tuesday, November 19, 2013 9:51 AM
To: IRRC
Subject: Keystone testing graduation requirements

To IRRC Members:

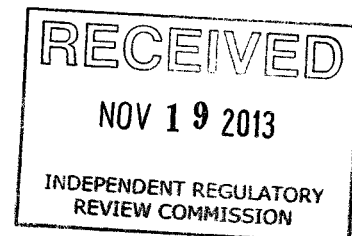
This email serves to reenforce the resolution being forwarded to you by the West Chester Area School Board. I support the resolution being sent for several reasons which I summarize below-

(1) I believe that decisions related to high school graduation are best left to the local school boards. This really is not a state government issue unless the state plans on raising the level of funding that it provides to local school districts.....

(2) In the case of WCASD the testing proposed would not be an academic challenge for the student population but more of a nuisance in interruption in the teaching process. Teachers will be teaching to the test and not focusing on higher levels of education that are provided in the district (Algebra 1- I hope that you are kidding me! This is a course intended for middle school. Don't waste our students time with another meaningless test.)

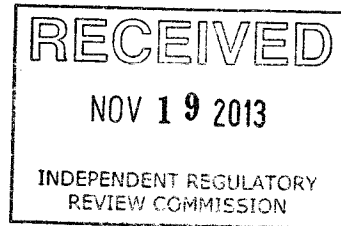
I realize that you have to tailor requirements to all districts- make it meaningful and set the bar higher if you must institute some form of testing.

Kind regards,
Taxpayer-Lee Diestelow
484-467-9021



To:
I R P C
RE: Common Core

November 12, 2013



It amazes to me that Common Core has become a part of our educational system. It was spawned in the agenda of Communism/Marxism and proposed by Gorbachev and agreed to by Ronald Reagan who I pray was fooled about the agenda to make a part of the students to be controlled by our government

Common Core agenda is to dumb down our children to control them. Included in the agenda is data mining, a complete journal of the student's behavior; emotional stability. They wear wrist bands with google printed on them to record their progress and their reactions to stressful situations. It destroys individuality and dreams and visions. My granddaughter was told cursive writing, no longer will be taught. That is destroy our individuality. We must print to be part of the collective.

(2)

I am 80 years old and wonder why we cannot teach reading writing and arithmetic.

I have included some facts taken from the internet.

Sincerely,
Nancy Hardin
2241 Mt Zion Rd
Weedville, Pa 15868

P.S. Remember "Better Dead than Red"
Give me liberty or give me death.

Pray the take over our Country by the "Powers that be" will bring us back to the Land of the Free!

How Does Common Core Dumb Down Math? 7 comments

When my 9th grader told me she wasn't learning anything in math this year, I didn't understand why. I didn't have enough information to even begin asking administrators or teachers why. But when the school year was almost over, because of a friend, I found out what "Common Core" education was and I started to research it for myself. And then I got it— like a kick in the head.

After you read the detailed review of the math standards (below, by mathematician Ze'ev Wurman) you'll understand, too.

Before Common Core came to our town, **teachers used to teach Algebra I in 8th grade**. That's when my daughter learned Algebra I: *last year*. **Now Common Core has come, claiming to provide rigor and to raise standards while placing Algebra I in 9th grade; she's learned nothing**. A wasted year. A review year.

How I wish I had somehow known earlier.

Our school district website and the Utah State Office of Education's website **continues to post and promote the claims of increased rigor** boasted by Common Core Standaristas.

They must surely know this is worse, not better, math: **why else are they working so hard to add honors classes and extra advanced math that make up for the deficiencies of Common Core?** My 9th grader is currently enrolled in an extra before-school math class now, in addition to her regular 9th grade Common Core math class. Parents each had to pay \$20 tuition for this extra class.

I am grateful the extra math class exists. But why hasn't Wasatch School District, by now, removed the now obviously false claims of Common Core's high standards and "rigor" from their websites? Excuse me while I scream into a pillow and pull out a handful of hair.

Okay. I'm back.

How Common Core math dumbs down math: mathematician # 1: Ze'ev Wurman

Ze'ev Wurman is a great mathematician who served as Senior Policy Adviser in the U.S. Department of Education 2007-2009 and served on the California Standards Commission that evaluated Common Core math standards for that state.

Wurman reviewed the Common Core Standards in math and stated: "they fail to achieve their stated goal of improving U.S. K-12 mathematic achievement."

Ze'ev Wurman also set forth this description of major deficiencies of Common Core in math:

1. Its abandonment of the expectation that students take Algebra I in grade 8. This expectation, based on the standard of the high-achieving countries (and our international competitors), has currently pushed about half of American students to take Algebra I by grade 8, more than double that of a decade ago. The Common Core will reverse this trend by firmly **relocating Algebra I back to a grade 9** high-school course. This change means that, as a practical matter, **the great majority of American students will not be able to reach calculus in high school**. Among other consequences, far fewer students will be able to take and excel in Advanced Placement (AP) math courses if the Common Core is implemented.

2. Related to the above-deficiency, a course of study aligned with the Common Core would provide students with poor preparation for taking Algebra in grade 8. Only private and elite schools will continue to provide

sufficient preparation and, consequently, one should expect the proportion of students from challenging backgrounds taking Algebra by grade 8, or advanced mathematics in high school, to drop precipitously.

3. Common Core replaces the traditional foundations of Euclidean geometry with an experimental approach. This approach has never been successfully used in any sizable system; in fact, it failed even in the school for gifted and talented students in Moscow, where it was originally invented. Yet Common Core effectively **imposes this experimental approach on the entire country, without any piloting.**

4. Common Core excludes certain Algebra II and Geometry content that is currently a prerequisite at almost every four-year state college (see point 9 below). This effectively **redefines “college-readiness” to mean readiness for a nonselective community college, as a member of the Common Core writing team acknowledged in his testimony** before the Massachusetts Board of Elementary and Secondary Education.

5. Common Core **fails to teach prime factorization** and consequently does not include teaching about least common denominators or greatest common factors.

6. Common Core **fails to include conversions among fractions, decimals, and percents**, identified as a key skill by the National Research Council, the National Council of Teachers of Mathematics, and the presidential National Advisory Mathematics Panel.

7. Common Core **de-emphasizes algebraic manipulation**, which is a prerequisite for advanced mathematics, and instead effectively redefines algebra as “functional algebra,” which does not prepare students for STEM careers.

8. More specifically, at the K-8 grade span:

8.1 Common Core **does not require proficiency with addition and subtraction until grade 4, a grade behind** the expectations of the high-performing states and our international competitors.

8.2 Common Core **does not require proficiency with multiplication using the standard algorithm (step-by-step procedure for calculations) until grade 5, a grade behind** the expectations of the high-performing states and our international competitors.

8.3 Common Core **does not require proficiency with division using the standard algorithm until grade 6, a grade behind** the expectations of the high-performing states and our international competitors.

8.4 Common Core **starts teaching decimals only in grade 4, about two years behind** the more rigorous state standards, and fails to use money as a natural introduction to this concept.

8.5 Common Core **fails to teach in K-8 about key geometrical concepts such as the area of a triangle**, sum of angles in a triangle, isosceles and equilateral triangles, or constructions with a straightedge and compass that good state standards include.

9. At the high school grades:

9.1 Common Core barely **touches on logarithms, of great importance for chemistry, physics, and STEM** in general.

9.2 Common Core fails to address mathematical induction.

9.3 Common Core fails to address parametric equations, and infinite geometric series (progressions with common ratio), and incompletely addresses conic sections.

9.4 Common Core omits in trigonometry the phase of periodic functions, half-angle formulas, and polar forms and functions.

Common Core suffers from a number of systemic defects. It groups mathematics standards into “conceptual categories,” which provide a vague structure for high school courses and makes for difficult use by teachers and textbook publishers. It provides verbose and imprecise guidance as to the level of fluency needed, omits basic skills such as factorization (reducing problems to the basic “building blocks” of the equation), and deemphasizes algebraic manipulation, leading to under-preparation for STEM disciplines. In terms of college readiness, its content is far below what is presently expected for college eligibility, which will create unreasonable expectations by parents and pressure on state universities to admit under-prepared students, with concomitant growth in remedial enrollment in college.

In this statement, I have endeavored to set forth a concise list of deficiencies in the Common Core math standards. Certainly, the issue requires more detailed discussion, and in that respect I draw your attention to the following study: Sandra Stotsky and Ze’ev Wurman, *Common Core’s Standards Still Don’t Make the Grade*, Pioneer Institute, No. 65 (July 2010). http://www.pioneerinstitute.org/pdf/common_core_standards.pdf

-Ze’ev Wurman

How Common Core math dumbs down math: mathematician # 2:

Professor James Milgram of Stanford University

Mathematics Professor R. James Milgram of Stanford University was the only mathematician on the Common Core Validation Committee.

He concluded that the mathematics standards would put students two years behind those of many high-achieving countries, such as those in East Asia. Like Dr. Sandra Stotsky, **Dr. Milgram refused to sign off on the adequacy of the Common Core standards.** Milgram identified several specific problems with the math standards; a significant concern was that Common Core places algebra I in grade 9 rather than grade 8. This means that the large majority of students will not reach calculus in high school, as expected by good 4-year colleges.

Professor Milgram concluded that the Standards simply do not qualify as “comparable to the expectations of other leading nations.”

“In most high-performing countries, calculus is a high school graduation requirement. **It’s almost a joke to think students [who master the common standards] would be ready for math at a university.**” Professor Milgram added that at Stanford University calculus is “considered remedial.”

http://blogs.edweek.org/edweek/state_edwatch/Controlling-Education-From-the-Top%5B1%5D.pdf

How Common Core math dumbs down math: mathematician # 3:

Professor Johnathan Goodman of New York University

Professor Jonathan Goodman of New York University criticized Common Core’s “**significantly lower expectations with respect to algebra and geometry** than the published standards of other countries.”

Why the Common Core is Bad for America

By Jonathan Butcher, Emmett McGroarty and Liv Finne, May, 2012

Key Findings

1. The Common Core is the basis for a national curriculum and national test.
2. Three hundred prominent policymakers and education experts warn the Common Core will close the door on innovation.
3. The Common Core standards are of insufficient quality.
4. The cost of the Common Core is considerable, yet unknown.

1. The Common Core is the basis for a national curriculum and national test.

Federal law prohibits the U.S. Department of Education from “exercis[ing] any direction, supervision, or control over the curriculum, program of instruction” or selection of “instruction[al] materials.” However, the Department circumvented these prohibitions by making Race to the Top funding and No Child Left Behind waivers contingent on a state’s adoption of the Common Core and the aligned assessments. Because curriculum must be aligned with standards and assessments, the Department would thus be able to exercise direction and control over curricula, programs of instruction, instructional materials.

2. Three hundred prominent policymakers and education experts warn the Common Core will close the door on innovation.

Local control of public school curriculum and instruction has historically driven innovation and reform in education. A one-size-fits-all, centrally controlled curriculum for every K-12 subject threatens to close the door on educational innovation, freezing in place an unacceptable status quo and hindering efforts to develop academically rigorous curricula, assessments, and standards that meet the challenges that lie ahead. State and local leaders cannot change Common Core content or the assessments. There is no evidence that national standards alone lead to higher academic results.

There is no “best design” for curriculum sequences in any subject. Requiring a single set of curriculum guidelines at the high school level is questionable, given the diversity of adolescents’ interests, talents, and pedagogical needs. American schools should not be constrained in the diversity of the curricula they offer to students. We should encourage – not discourage – multiple models.

3. The Common Core standards are of insufficient quality.

Common Core’s standards are of insufficient quality to warrant being this country’s national standards.

The Common Core math standards fail to meet the content targets recommended by the National Mathematics Advisory Panel, the standards of leading states, and our international competitors. They exclude certain Algebra 2 and Geometry content that is currently a prerequisite at almost every four-year state college, essentially re-defining “college readiness” to mean readiness for a non-selective community college. They abandon the expectation that students take Algebra 1 in eighth grade. (This expectation is based upon what high-performing countries expect of their students, and has pushed about half of America’s students to take Algebra 1 by eighth grade). The Common Core math standards also require that geometry be taught by an experimental method that had never been used successfully anywhere in the world. The Common Core math standards do not teach least common denominators; delay until sixth grade fluency in division; eliminate conversions between fractions, decimals and percents; adopt a new definition of algebra as “functional algebra” that de-emphasizes algebraic manipulation.

In English Language Arts, Common Core standards are inadequate. The Common Core “college readiness” ELA standards can best be described as skill sets, not fully developed standards. As such, they cannot point to readiness for a high school diploma or four-year college coursework. Skill sets in themselves do not provide an intellectual framework for a coherent and demanding English curriculum. The Common Core document expects English teachers to spend over 50% of their reading instructional time on informational texts in a variety of subject areas, something English or reading teachers are not trained to teach. This requirement alone makes it impossible for English teachers to construct a coherent literature curriculum in grades 6-12. The ELA Common Core Standards will impair the preparation of students for competing in a global economy.

4. The cost of the Common Core is considerable, yet unknown.

States and their taxpayers face significant increased costs in four areas: textbooks and instructional materials, professional development, assessments; and technology and infrastructure. One peer-reviewed study estimates this at \$16 billion. The assessment costs will further increase if the consortia are unable to sufficiently refine technologies to score open-ended questions (such as short answer questions) for use in large-scale high-stakes testing. Few states have evaluated these issues.

A version of this paper was submitted to the American Legislative Exchange Council by authors Jonathan Butcher of the Goldwater Institute, goldwaterinstitute.org, Emmett McGroarty of the American Principles Project, americanprinciplesproject.org, and Liv Finne of Washington Policy Center, washingtonpolicy.org.

Download a PDF of this Policy Note here.

Education

Ze'ev Wurman, a prominent software architect, electrical engineer, and longtime math-advisory expert in California and Washington, D.C., points out that Common Core delays proficiency with addition and subtraction until 4th grade and proficiency with basic multiplication until 5th grade, and skimps on logarithms, mathematical induction, parametric equations, and trigonometry at the high-school level.

I cannot sum up the stakes any more clearly than Wurman did in his critique of this mess and the vested interests behind it:

I believe the Common Core marks the cessation of educational standards improvement in the United States. No state has any reason left to aspire for first-rate standards, as all states will be judged by the same mediocre national benchmark enforced by the federal government. Moreover, there are organizations that have reasons to work for lower and less-demanding standards, specifically teachers unions' and professional teacher organizations. While they may not admit it, they have a vested interest in lowering the accountability bar for their members. . . . This will be done in the name of 'critical thinking' and "21st-century" skills, and in faraway Washington, D.C., well beyond the reach of parents and most states and employers.

This is all in keeping with my own experience as a parent of elementary- and middle-school age kids who were exposed to "Everyday Math" nonsense. This and other fads abandon "drill and kill" memorization techniques for fuzzy "critical thinking" methods that put the cart of "why" in front of the horse of "how." In other words: Instead of doing the grunt work of hammering times tables and basic functions into kids' heads first, the faddists have turned to wacky, wordy non-math alternatives to encourage "conceptual" understanding — without any mastery of the fundamentals of math.

Common Core is rotten to the core. The corruption of math education is just the beginning.

—*Michelle Malkin is the author of Culture of Corruption: Obama and His Team of Tax Cheats, Crooks & Cronies. © 2013 Creators.com*

Independent Regulatory Review Commission
David Sumner, Executive Director
333 Market Street, 13th Floor
Harrisburg, PA 17101



RE: VOTE NO on Chapter 4 Regulations

Dear Mr. Sumner,

As a Pennsylvania taxpayer and a mother of school aged children, I am writing to say I adamantly oppose the Keystone exams being tied to a student's high school graduation. I am asking you to reject the proposed Chapter 4 regulations.

Keystone Exams are a waste of taxpayer dollars. It is estimated that PA will spend close to \$300 million annually on the implementation of Keystone Exams. This money would be better spent on helping teachers and students in districts that are struggling. I live in Allegheny County and every day I read articles about the lack of financial resources available to them. Instead of forcing all school districts to take a one-size-fits-all exam, use those dollars to help the struggling school districts, such as those in Allegheny County.

Keystone exams are a waste of student and teacher time. Teachers should be allowed to teach material according to their school district's curriculum. Each school should be empowered to give an exam or final project that they create. It makes no sense that a child that has completed all necessary coursework and has passed the school's necessary tests/projects could then possibly not graduate from high school due to one high stake exam.

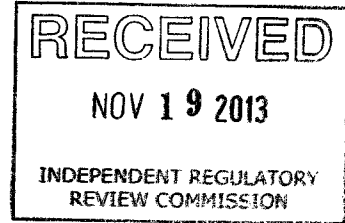
Too much time and money is already spent on standardized testing in our public schools. I want my children to enjoy school, have an inherent sense of curiosity and a love of learning. I do not want my children to spend their days preparing for state mandated exams. Many of our children will have to take the Keystone exams as well as the PSSA exams. Our elementary and primary school children run the risk of decreased recess, PE, art, music and foreign language due to test preparation. This is too much. **The testing madness needs to stop!**

I urge you to VOTE NO on the Chapter 4 regulations. It is time to slow down and develop a new plan to measure student progress and achievement. Let the teachers educate, and let the students learn. Do not waste our money and time on high stakes tests.

Respectfully,

Concerned Parents & Taxpayers of Allegheny County

Shirley Heckman
1 Sunset Drive
Hazle Township, PA 18201



November 13, 2013

David Sumner, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Mr. Sumner:

I am writing to you today regarding the New PA Core Standards. It is my hope that Pennsylvania does not "hop on the bandwagon" and become part of the Federal governments' Race to the Top program.

A national standard for education is specifically prohibited by the constitution. The fact that the Federal government ignores the laws of the land is very disturbing and insulting to the citizens of this (once) great nation. Also disturbing is the fact that the Family Education Rights and Privacy Act was amended in December 2011 to include exceptions allowing student information to be shared without parental knowledge or consent.

The Federal government interfering in education cannot be a good thing! The Affordable Healthcare Act debacle is a prime example of the undesirable effects of the federal government intervening where it doesn't belong!

Some questions I have are:

- How will this program be funded?
- Will districts be able to opt out?
- How will the standards "raise the bar for education" rather than "lower it" by teaching to the lowest level in the class?
- What is the foundation for these proposed changes?
- Will standards be able to be amended if all local control is removed?
- Can parents opt out of the data tracking system?

Please give control back to the states and local districts and reject the proposed Final-Form Chapter 4 regulations.

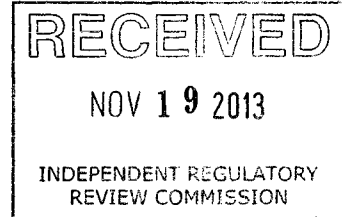
Sincerely,

A handwritten signature in cursive script that reads "Shirley Heckman".

Shirley Heckman

Loretta C. Tate
1031 East Haines Street
Philadelphia, PA 19138

November 16, 2013



Independent Regulatory Review Commission
David Sumner, Executive Director
333 Market Street, 14th Floor
Harrisburg, Pa. 17101

Dear Commission Members:

I am writing to ask that you REJECT the Keystone Graduation Exams being considered for Pennsylvania School Districts. A mandatory test would only continue to have teachers teach to the passing of a test/exam and not teaching to enhance learning with an inspiring curriculum.

Information shared about school districts in Pennsylvania do not project that 100% of student bodies are capable of meeting an all A passing grade in subjects across the board. The Keystone Graduation Exams would mean that all students would have to have above average intelligence and teachers would have to be performing at a teacher/student ratio of 1 to 6 or less.

The big questions that comes to mind is, What will happen to the thousands of students who do not pass the Keystone Graduation Exams, year after year? What psychological impact will the failure of Keystone Graduation Exams have on the students? What impact will Keystone Graduation Exams have on high school drop?

The emphasis should be on making sure that every student in Pennsylvania achieves his potential regardless of her/his intellectual level. I do not believe that a mandated passing of a state graduation exam would provide for each student attaining their full potential. Teaching should be inspiring, motivational, and plain fun, with little to no stress. I assume that you have heard of the number of college freshman recently admitted cheating on exams. Again, I highly recommend that you, the Commission, REJECT the Keystone Gradation Exams.

Sincerely,

A handwritten signature in cursive script that reads "Loretta C. Tate". The signature is written in black ink and is positioned above the printed name.

Loretta C. Tate