

Regulation #6-326 (IRRC #2976)
State Board of Education
Academic Standards and Assessment

Larry Wittig, Chairman
State Board of Education

Stephanie Jones

Date: 11-30-13

 * P. 01 *
 * TRANSACTION REPORT *
 * NOV-20-2013 WED 10:11 AM *
 * FOR: *
 * SEND *
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 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Paul Clymer, Chairman
Agency: House Education Committee
Phone: 783-3154
Fax: 705-1854
Date: 11/20/13
of Pages: 40

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable James Roebuck, Minority Chairman
Agency: House Education Committee
Phone: 783-1000
Fax: 783-1665
Date: 11/20/13
of Pages: 40

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

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P. 01

NOV-20-2013 WED 10:40 AM

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 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Mike Folmer, Chairman
 Agency: Senate Education Committee
 Phone: 787-5708
 Fax: 787-3455
 Date: 11/20/13
 # of Pages: 40

RE State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745 5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. Please distribute this material to the appropriate regulatory staff as soon as possible.

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P. 01

NOV-20-2013 WED 10:51 AM

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NOV-20	10:46 AM	97874384	5' 07"	40	FAX TX	OK	095	

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Andrew E. Dinniman, Minority Chairman
 Agency: Senate Education Committee
 Phone: 787-5709
 Fax: 787-4384
 Date: 11/20/13
 # of Pages: 40

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

EMBARGOED MATERIAL

Cooper, Kathy

From: Hippert, Linda <linda.hippert@aiu3.net>
Sent: Tuesday, November 19, 2013 5:20 PM
To: IRRC
Subject: CORRESPONDENCE from INTERMEDIATE UNIT 3 and Allegheny County Superintendents
Attachments: Response from Allegheny County, AIU 3 to IRRC for Chapter 4 Regulations Revisions - 11-19-13.pdf

Please share the attached correspondence related to Chapter 4 Regulations with the IRRC.

Thank you.

Sincerely,

Dr. Linda B. Hippert



Dr. Linda B. Hippert
Executive Director
Allegheny Intermediate Unit
475 East Waterfront Drive
Homestead, Pennsylvania 15120
E-Mail: linda.hippert@aiu3.net
Office: 412.394.5705
Fax: 412.394.5706
Mobile: 412.389-6631

"Doing what is right isn't always easy, but it is always right." . . . John Maxwell

RECEIVED
IRRC
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November 19, 2013

Mr. Silvan B. Lutkewitte, III
Chair, Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: IRRC#2976 State Board of Education #6-326

Dear Chairman Lutkewitte:

The Allegheny Intermediate Unit and the 42 school districts we serve in Allegheny County strongly encourage you to approve the revised State Board of Education's Chapter 4 regulations.

We present this recommendation noting that we continue to see imperfections in the regulations which in turn negatively impact students in our schools; however, the proposed Chapter 4 regulations reflect improvements to the current regulations and are a better alternative to what is currently in place.

In moving forward we urge policymakers to carefully review unintended consequences which often result from the lack of thorough vetting of proposed changes and clarity of implementation. We continue to strongly believe that:

1. No single assessment should determine a child's ability to graduate from high school.
2. The number of tests given to any student at a grade level should be limited.
3. No additional Keystone Exams should be introduced.
4. The costs to school districts and subsequent implementation related to project based assessments should be carefully scrutinized and modified as permissible.

Our school districts in Allegheny County serve over 120,000 students and our educators are willing to offer their knowledge, expertise and time to do what is right and best to prepare the children in our Commonwealth for lifelong success.

Sincerely,

Dr. Linda B. Hippert
Executive Director, Allegheny Intermediate Unit and AIU3 School Districts

ALLEGHENY COUNTY INTERMEDIATE UNIT and SCHOOL DISTRICTS

Dr. Cheryl A. Griffith
Allegheny Valley School District
300 Pearl Avenue
Cheswick, PA 15024
724-274-5300
cgriffith@avsd.k12.pa.us

Mr. Thomas Ralston
Avonworth School District
258 Josephs Lane
Pittsburgh, PA 15237
412-369-8738
tralston@avonworth.k12.pa.us

Dr. Randal Lutz
Baldwin-Whitehall School District
4900 Curry Road
Pittsburgh, PA 15236-1817
412-884-6300, Ext. 7240
rlutz@bwschools.net

Ms. Nancy Aloï Rose
Bethel Park School District
301 Church Road
Bethel Park, PA 15102-1696
412-854-8402
rose.nancy@bpsd.org

Dr. Ronald W. Duffalla
Brentwood Borough School District
3601 Brownsville Road
Pittsburgh, PA 15227-3117
412-881-2227, Ext. 2400
rduffalla@brentwoodpgh.k12.pa.us

Mr. Gary Peiffer
Carlynton School District
435 King's Highway
Carnegie, PA 15106
412-429-2500, Ext. 1101
gary.peiffer@carlynton.k12.pa.us

Dr. Brian White
Chartiers Valley School District
2030 Swallow Hill Road
Pittsburgh, PA 15220-1699
412-429-2202
bwhite@cvsd.net

Dr. Ginny Hunt
Clairton City School District
502 Mitchell Avenue
Clairton, PA 15025
412-233-7090
huntg@clairton.k12.pa.us

Mr. Aaron Thomas
Cornell School District
1099 Maple Street
Coraopolis, PA 15108
412-264-5010, Ext. 120
athomas@cornell.k12.pa.us

Dr. Janet R. Ciramella
Deer Lakes School District
19 East Union Road
Cheswick, PA 15024-1724
724-265-5300, Ext. 1210
jciramella@dlsd.k12.pa.us

Ms. Barbara McDonnell
Duquesne City School District
300 Kennedy Avenue
Duquesne, PA 15110
412-466-5300, Ext. 7023
mcdonnellb@dukesk12.org

Mr. Roger A. D'Emidio
East Allegheny School District
1150 Jacks Run Road
North Versailles, PA 15137-2797
412-824-8012, Ext. 4158
rdemidio@eawildcats.net

Dr. Bart Rocco
Elizabeth Forward School District
401 Rock Run Road
Elizabeth, PA 15037
412-896-2310
brocco@efsd.net

Dr. Anne E. Stephens
Fox Chapel Area School District
611 Field Club Road
Pittsburgh, PA 15238
412-967-2414
anne_stephens@fcsd.edu

Dr. Nina Zetty
Gateway School District
9000 Gateway Campus Boulevard
Monroeville, PA 15146
412-373-5700
nzetty@gatewayk12.org

Dr. John C. Hoover
Hampton Township School District
4591 School Drive
Allison Park, PA 15101-2516
412-492-6303
hoover@ht-sd.org

Dr. Michael Bjalobok
Highlands School District
1330 Eleventh Ave, PO Box 288
Natrona Heights, PA 15065
724-226-2400, Ext. 213
mbjalobok@goldenrams.com

Dr. William Stropkaj
Keystone Oaks School District
1000 Kelton Avenue
Pittsburgh, PA 15216-2487
412-571-6004
stropkaj@kosd.org

Dr. Rula Skezas
McKeesport Area School District
3590 O'Neil Boulevard
McKeesport, PA 15132
412-664-3612
rskezas@mckasd.net

Dr. Donald Boyer
Montour School District
225 Clever Road
McKees Rocks, PA 15136
412-490-6500, Ext. 6224
boyerd@montourschools.com

Mrs. Caroline Johns
Moon Area School District
8353 University Boulevard
Moon Township, PA 15108
412-264-9440, Ext. 1105
cjohns@moonarea.net

Dr. Timothy J. Steinhauer
Mt. Lebanon School District
7 Horsman Drive
Pittsburgh, PA 15228
412-344-2076
tsteinhauer@mtlisd.net

Dr. Raymond Gualtieri
North Allegheny School District
200 Hillvue Lane
Pittsburgh, PA 15237
412-369-5430
rgualtieri@northallegheny.org

Dr. Patrick J. Mannarino
North Hills School District
135 Sixth Avenue
Pittsburgh, PA 15229-1291
412-318-1004
mannarinop@nhsd.net

Dr. Joseph Pasquerilla
Northgate School District
591 Union Avenue
Pittsburgh, PA 15202
412-732-3300, Ext. 2110
ipasquerilla@northgate.k12.pa.us

Mr. Thomas K. Washington
Penn Hills School District
260 Aster St.
Pittsburgh, PA 15235
412-793-7000, Ext. 1210
twashi@phsd.k12.pa.us

Dr. Brian Miller
Pine-Richland School District
702 Warrendale Road
Gibsonia, PA 15044
724-625-7773, Ext. 6100
bmiller@pinerichland.org

Dr. Timothy S. Glasspool
Plum Borough School District
900 Elicker Road
Plum, PA 15239
412-795-0100, Ext. 6359
glasspoolt@pbsd.k12.pa.us

Dr. Joseph H. Clapper
Quaker Valley School District
100 Leetsdale Industrial Drive, Suite B
Leetsdale, PA 15056
412-749-3617
clapperj@qvsd.org

Dr. Margaret DiNinno
Riverview School District
701 Tenth Street
Oakmont, PA 15139
412-828-1800, Ext. 4080
mdininno@rsd.k12.pa.us

Dr. Wes W. Shipley
Shaler Area School District
1800 Mt. Royal Boulevard
Glenshaw, PA 15116
412-492-1200, Ext. 2801
shipleyw@sasd.k12.pa.us

Mr. Wayne Gdovic
South Allegheny School District
2743 Washington Boulevard
McKeesport, PA 15133-2017
412-675-3070, Ext. 1101
wgdovic@southallegheny.org

Dr. Bille P. Rondinelli
South Fayette Twp. School District
3680 Old Oakdale Road
McDonald, PA 15057
412-221-4542, Ext. 413
brondinelli@southfayette.org

Mrs. Jeanine Gregory
South Park School District
2005 Eagle Ridge Road
South Park, PA 15129
412-655-3111
gregoryj@sparksd.org

Mr. Edward Wehrer
Steel Valley School District
220 East Oliver Rd.
Munhall, PA 15120
412-464-3600, Ext. 1505
ewehrer@steelvalleysd.org

Mr. Frank Dalmas
Sto-Rox School District
600 Russellwood Avenue
McKees Rocks, PA 15136
412-778-8871, Ext. 5235
fdalmas@srsd.k12.pa.us

Dr. Patrick O'Toole
Upper St. Clair School District
1820 McLaughlin Run Road
Upper St. Clair, PA 15241
412-833-1600, Ext. 2050
potoole@uscscd.k12.pa.us

Dr. John S. DiSanti
West Allegheny School District
PO Box 55
Imperial, PA 15126
724-695-5210
jdisanti@westasd.org

Dr. Michael Panza
West Jefferson Hills School District
835 Old Clairton Road
Jefferson Hills, PA 15025-3131
412-655-8450, Ext. 2230
mpanza@wjhsd.net

Dr. Daniel Castagna
West Mifflin Area School District
3000 Lebanon Church Road, Suite 300
West Mifflin, PA 15122-2697
412-466-9131, Ext. 3003
castagnad@wmasd.org

Mr. Lee McFerren
Wilkinsburg Boro School District
718 Wallace Avenue
Wilkinsburg, PA 15221
412-371-9667, Ext. 2275
mcfarrenl@wilkinsburgschools.org

Mr. Alan Johnson
Woodland Hills School District
2430 Greensburg Pike
Pittsburgh, PA 15221-3666
412-731-1300, Ext. 0181
johnal@whsd.net

Dr. Linda Hippert
Allegheny Intermediate Unit
475 East Waterfront Drive
Homestead, PA 15120
412-394-5705
linda.hippert@aiu3.net

EMBARGOED MATERIAL

Cooper, Kathy

From: Grunwell, John E <John.Grunwell@unisys.com>
Sent: Tuesday, November 19, 2013 9:43 PM
To: IRRC
Subject: opposition to Keystone Graduation Exams

Please note that I've read that this mandate may cost \$300 million a year. I would prefer that money spent on schools rather than a standardized exams. I was trained as an educator and find that these tests SOUND better than they actually work toward any usefulness.

Doningtown, PA 19335

Handwritten notes or markings on the right side of the page, including a vertical line and some illegible characters.

EMBARGOED MATERIAL

Cooper, Kathy

From: maryannmahlen@reagan.com
Sent: Tuesday, November 19, 2013 5:19 PM
To: IRRRC
Cc: Brett Mahlen
Subject: PA Common Core

Dear Sirs:

My name is Maryann Mahlen. I am a voting, taxpaying resident of the Commonwealth of Pennsylvania. I am 46 year-old wife and homeschooling mother of one preschool child. I have read the recent Common Core information, and I am against Pennsylvania adopting Common Core Standards as dictated by the U.S. D.O.E.

Pennsylvania adopting Common Core Standards as dictated by the U.S. D.O.E. would mean the Federalization of PA education. Federalization of PA education would remove the parent from making decisions for their own child. I am homeschooling my child according to the Trivium or the Classical approach, which has been used successfully for centuries to teach children how to learn and think and be creative. Why is this approach not being adopted by PA? I am also a Christian with a Master of Divinity degree. I have the responsibility to teach my child in accordance with Biblical principles.

I am very uncomfortable with the Federal Government offering millions of dollars to PA to adopt Common Core Standards. Would PA be so excited to adopt Common Core Standards if the Federal Government was not offering millions of dollars that it cannot afford in the first place? If this money were to be accepted by PA, what else would the Federal Government require of PA to allow PA to continue receiving money? This appears to be the Federal Government undermining the Sovereignty of the Commonwealth of Pennsylvania and the rights of her citizens to make decisions at the local level.

Thank you for this opportunity to voice my opinion against the Commonwealth of Pennsylvania adopting U.S D.O.E. Common Core Standards.

Respectfully,

Maryann Mahlen
724.266.2149

EMBARGOED MATERIAL

Cooper, Kathy

From: Mary Kramaric <marykramaric@yahoo.com>
Sent: Tuesday, November 19, 2013 6:40 PM
To: IRRC
Subject: Oppose Keystone Graduation Exams

For nearly 30 years I have taught children in the primary grades. As an experienced educator, I strongly oppose the Keystone Graduation Exams. As a Pennsylvania taxpayer I am appalled the effect this will have on our taxes. I will not be voting for any legislators who support the Keystone Graduation Exams.

Thank you for your consideration.
Mary L. Kramaric, M.Ed

EMBARGOED MATERIAL

Cooper, Kathy

From: cara <caraandcorey3@verizon.net>
Sent: Tuesday, November 19, 2013 7:46 PM
To: IRRC
Subject: please vote AGAINST Common Core curriculum for our state

I am very concerned about the pending vote by the Independent Regulatory Review Commission (IRRC) on the Keystone Exams Thursday, Nov. 21, 2013.

My son is in the first class (2017) which will be impacted by this new set of requirements if they are passed. Given that the Commonwealth of Pennsylvania recently endured draconian cuts to the education system, to add this mandate will place an undue burden on school districts and in the process punish those students who already face difficulty. With school districts struggling to reapportion resources in the wake of the budget cuts, how is it fiscally responsible to add in a new set of requirements placing further strain on an already overloaded system? The cost to school districts (and taxpayers) is estimated to exceed \$300 million. Where will that money come from? I fear the answer is that districts will be forced to cut more programs that are already stretched too thin, further negatively impacting our students.

In Southeastern PA, 58 of 61 school superintendents and IU executive directors signed a position paper (attached) opposing the Keystone Exams, including the superintendent from my school district, Downingtown. They cite a number of reasons, chief among them the costs of the exams in addition to the lack of communication from the PA Department of Education regarding implementation and outcomes, and the negative impact it will have on PA students first and foremost, in addition to teachers and school districts.

I urge you not to require the Keystone Exams as a graduation requirement. Accountability and rigorous standards are a vital part of the education system; poorly implemented, costly and needless exams are not.

thank you
Cara Phalen

01/19/13 11:11 AM
C. J. ...

EMBARGOED MATERIAL

Cooper, Kathy

From: grace karaman <karamanfamily8@gmail.com>
Sent: Tuesday, November 19, 2013 9:20 PM
To: IRRC
Subject: opposed to keystone exams

we are opposed to the keystone exams; would be more waste of time & money.

Grace Karaman
243 parkview boulevard
spring city pa 19475

CONFIDENTIAL

Cooper, Kathy

From: ContactForm@state.pa.us
Sent: Tuesday, November 19, 2013 8:38 PM
To: Help
Subject: IRRC Website - New Message



A new message has arrived from the IRRC Website

First Name: Grant

Last Name: Donesky

City/State: Philadelphia, PS

Email: gonesky@uarts.edu

Subject: Keystone provisions, Chapter 4 Regulations

Message:

I am OPPOSED to the Keystone provisions in the currently proposed Chapter 4 Regulations. I urge you NOT to require Keystone exams as a graduation requirement.

Cooper, Kathy

From: ContactForm@state.pa.us
Sent: Tuesday, November 19, 2013 8:44 PM
To: Help
Subject: IRRC Website - New Message



A new message has arrived from the IRRC Website

First Name: Tricia

Last Name: Hefner

City/State: ,

Email: tjhefner3@gmail.com

Subject: Revisions to title 22

Message:

As the parent of 3 kids (1 just graduated), 2 in school, I am very concerned about all of the testing that is required these days and the keystone exams in general. I would encourage you to please pass the proposed revisions to TITLE 22. EDUCATION - CHAPTER 4. ACADEMIC STANDARDS AND ASSESSMENT. Our local districts need more say in our children's education.

EMBARGOED MATERIAL

Cooper, Kathy

From: teddi <teddit@cox.net>
Sent: Tuesday, November 19, 2013 10:13 PM
To: IRRC
Subject: Academic Standards & Assessments. Regulation #6-326 (IRRC #2976)
Importance: High

Sent from Samsung tablet

----- Original message -----

Subject: Academic Standards & Assessments. Regulation #6-326 (IRRC #2976)
From: teddi <teddit@cox.net>
To: fwilmarth@irrc.state.pa.us
Cc: IRRC@IRRC.STATE.PA.US

We do NOT support The PA Common Core Standards.

We have spent many hours researching to get to the truth regarding CCSS.

We couldn't have expressed our concerns any better than teacher Anthony Cody did in this article.

Anthony Cody spent 24 years working in Oakland schools, 18 of them as a science teacher at a high needs middle school. He is National Board certified, and now leads workshops with teachers focused on Project Based Learning. With education at a crossroads, he invites you to join him in a dialogue on education reform and teaching for change and deep learning. For additional information on Cody's work, visit his Web site, Teachers Lead. Or follow him on Twitter.

Common Core Standards: Ten Colossal Errors

By Anthony Cody on November 16, 2013 6:18 AM

A recent book described the "Reign of Errors" we have lived through in the name of education reform. I am afraid that the Common Core continues many of these errors, and makes some new ones as well.

The Business Roundtable announced last month that its #1 priority is the full adoption and implementation of the Common Core standards. The U.S. Chamber of Commerce is likewise making a full-court press to advance the Common Core. Major corporations have taken out full-page ads to insist that the Common Core must be adopted. Many leading figures in the Republican party, like Jeb Bush, have led the charge for Common Core, as have entrepreneurs like Joel Klein. And the project has become a centerpiece for President Obama's Department of Education.

Yet in New York, the first large state to implement the tests associated with the new standards, students, parents and principals are expressing grave concerns about the realities of the Common Core. Common Core

proponents like Arne Duncan have been quick to ridicule critics as misinformed ideologues or delusional paranoiacs. Defenders of the common standards, like Duncan and Commissioner John King in New York, insist that only members of the Tea Party oppose the Common Core. In spite of this, the opposition is growing, and as more states begin to follow New York's lead, resistance is sure to grow.

With this essay, I want to draw together the central concerns I have about the project. I am not reflexively against any and all standards. Appropriate standards, tied to subject matter, allow flexibility to educators. Teachers ought to be able to tailor their instruction to the needs of their students. Loose standards allow educators to work together, to share strategies and curriculum, and to build common assessments for authentic learning. Such standards are necessary and valuable; they set goals and aspirations and create a common framework so that students do not encounter the same materials in different grades. They are not punitive, nor are they tethered to expectations that yield failure for anyone unable to meet them.

The Common Core website has a section devoted to debunking "myths" about the Common Core—but many of these supposed myths are quite true. I invite anyone to provide factual evidence that disproves any of the information that follows. (And for the sake of transparency, I ask anyone who disputes this evidence to disclose any payments they or their organization has received for promoting or implementing the Common Core.)

Here are ten major errors being made by the Common Core project, and why I believe it will do more harm than good.

Error #1: The process by which the Common Core standards were developed and adopted was undemocratic.

At the state level in the past, the process to develop standards has been a public one, led by committees of educators and content experts, who shared their drafts, invited reviews by teachers, and encouraged teachers to try out the new standards with real children in real classrooms, considered the feedback, made alterations where necessary, and held public hearings before final adoption.

The Common Core had a very different origin. When I first learned of the process to write new national standards underway in 2009, it was a challenge to figure out who was doing the writing. I eventually learned that a "confidential" process was under way, involving 27 people on two Work Groups, including a significant number from the testing industry. Here are the affiliations of those 27: ACT (6), the College Board (6), Achieve Inc. (8), Student Achievement Partners (2), America's Choice (2). Only three participants were outside of these five organizations. ONLY ONE classroom teacher WAS involved—on the committee to review the math standards.

This committee was expanded the next year, and additional educators were added to the process. But the process to write the standards remained secret, with few opportunities for input from parents, students and educators. No experts in language acquisition or special education were involved, and no effort was made to see how the standards worked in practice, or whether they were realistic and attainable.

David Coleman is credited publicly as being the "architect" of the process. He, presumably, had a large role in writing the English Language Arts standards; Jason Zimba of Bennington College was the lead author for the math standards. Interestingly, David Coleman and Jason Zimba were also members of Michelle Rhee's StudentsFirst original board of directors.

The organizations leading the creation of the Common Core invited public comments on them. We were told that 10,000 comments were submitted, but they were never made public. The summary of public feedback quotes only 24 of the responses, so we are left only with the Common Core sponsors' interpretation of the rest.

The process for adopting the Common Core was remarkably speedy and expedient. Once the standards were finalized and copyrighted, all that was required for states to adopt them were two signatures: the governor and the state superintendent of education. Two individuals made this decision in state after state, largely without public hearings or input. Robert Scott, former state Commissioner of Education in Texas, said that he was asked to approve the standards before there was even a final draft.

The Common Core process could not have been directly paid for by the federal Department of Education, which is prevented by law from enacting or promoting national standards. So Bill Gates footed the bill. The Gates Foundation has, so far, paid \$191 million to develop and promote the Common Core. Of that sum, \$33 million was earmarked for the development of the Common Core. The remaining \$158 million was spent on myriad organizations to buy their active support for the standards—with \$19 million awarded just in the past month. Many of the voices in the public arena, including teacher unions, the national PTA, journalistic operations like John Merrow's Learning Matters, and the National Catholic Educational Association, have received grants for such work.

Although specifically prohibited from interfering in the curriculum or instruction in the nation's classrooms, the federal Department of Education has used threats and bribes to coerce states to adopt Common Core. Indeed, the active role of the U.S. Department of Education in supporting, advocating for, and defending the Common Core may be illegal, as may the Department's award of \$350 million to develop tests for the Common Core. The Department might reasonably argue that it was appropriate to encourage the development of "better" tests, but in this case the tests were specifically intended to support only one set of standards: the Common Core.

Public Law 103-33, General Education Provisions Act, sec 432, reads as follows:

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In spite of this prohibition, Race to the Top gave major points to states that adopted "college and career ready standards" such as Common Core.

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...the federal government can provide key financial support for this effort in developing a common core of state standards and in moving toward common assessments, such as through the Race to the Top Fund authorized in the American Recovery and Reinvestment Act of 2009. Further, the federal government can incentivize this effort through a range of tiered incentives, such as providing states with greater flexibility in the use of existing federal funds, supporting a revised state accountability structure, and offering financial support for states to effectively implement the standards.

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Thus, the Gates Foundation worked within the Race to the Top process to apply additional pressure on states to sign on to the Common Core.

Coming at a time when state education budgets were under great pressure, these inducements were significant in overcoming any hesitations on the part of most governors. The pressure continues, as NCLB waivers depend on the adoption of "college and career ready standards," which are most readily provided by the Common Core.

It is also worth noting that alongside the adoption of Common Core standards, both Race to the Top and NCLB waivers being issued by the Department of Education require states to include test scores in the evaluations of teachers and principals. This is a package deal.

Error #2: The Common Core State Standards violate what we know about how children develop and grow.

One of the problems with the blinkered development process described above is that no experts on early childhood were included in the drafting or internal review of the Common Core.

In response to the Common Core, more than 500 experts signed the Joint Statement of Early Childhood Health and Education Professionals on the Common Core Standards Initiative. This statement now seems prophetic in light of what is happening in classrooms. The key concerns they raised were:

1. Such standards will lead to long hours of instruction in literacy and math.
2. They will lead to inappropriate standardized testing
3. Didactic instruction and testing will crowd out other important areas of learning.
4. There is little evidence that such standards for young children lead to later success.

Many states are now developing standards and tests for children in kindergarten, 1st grade, and 2nd grade, to "prepare" them for the Common Core. Early childhood education experts agree that this is developmentally inappropriate. Young children do not need to be subjected to standardized tests. Just recently, the parents of a k-2 school refused to allow their children to be tested. They were right to do so.

Error #3: The Common Core is inspired by a vision of market-driven innovation enabled by standardization of curriculum, tests, and ultimately, our children themselves.

There are two goals here that are intertwined. The first is to create a system where learning outcomes are measurable, and students and their teachers can be efficiently compared and ranked on a statewide and national basis. The second is to use standardization to create a national market for curriculum and tests. The two go together, because the collection of data allows the market to function by providing measurable outcomes. Bill Gates has not spoken too much recently about the Common Core, but in 2009, he was very clear about the project's goals.

He said that

...identifying common standards is just the starting point. We'll only know if this effort has succeeded when the curriculum and tests are aligned to these standards. Secretary Arne Duncan recently announced that \$350 million of the stimulus package will be used to create just these kinds of tests - "Next Generation assessments," aligned to the Common Core. When the tests are aligned to the common standards, the curriculum will line up as well. And it will unleash a powerful market of people providing services for better teaching. For the first time, there will be a large, uniform base of customers looking at using products that can help every kid learn, and every teacher get better.

This sentiment was shared by the U.S. Department of Education, as was made clear when Arne Duncan's Chief

of Staff, Joanne Weiss, wrote this in 2011:

The development of common standards and shared assessments radically alters the market for innovation in curriculum development, professional development, and formative assessments. Previously, these markets operated on a state-by-state basis, and often on a district-by-district basis. But the adoption of common standards and shared assessments means that education entrepreneurs will enjoy national markets where the best products can be taken to scale.

In the market-driven system enabled by the Common Core, the "best products" will be those which yield the highest test scores. As Gates said: "The standards will tell the teachers what their students are supposed to learn, and the data will tell them whether they're learning it."

Thus, the overriding goal of the Common Core and the associated tests seems to be to create a national marketplace for products. As an educator, I find this objectionable. The central idea is that innovation and creative change in education will only come from entrepreneurs selling technologically based "learning systems." In my 24 years in high poverty schools in Oakland, the most inspiring and effective innovations were generated by teachers collaborating with one another, motivated not by the desire to get wealthy, but by their dedication to their students.

Error #4: The Common Core creates a rigid set of performance expectations for every grade level, and results in tightly controlled instructional timelines and curriculum.

At the heart of the Common Core is standardization. Every student, without exception, is expected to reach the same benchmarks at every grade level. Early childhood educators know better than this. Children develop at different rates, and we do far more harm than good when we begin labeling them "behind" at an early age.

The Common Core also emphasizes measurement of every aspect of learning, leading to absurdities such as the ranking of the "complexity" of novels according to an arcane index called the Lexile score. This number is derived from an algorithm that looks at sentence length and vocabulary. Publishers submit works of literature to be scored, and we discover that Mr. Popper's Penguins is more "rigorous" than Steinbeck's Grapes of Wrath. Cue the Thomas B. Fordham Institute to moan that teachers are not assigning books of sufficient difficulty, as the Common Core mandates.

This sort of ranking ignores the real complexities within literature, and is emblematic of the reductionist thinking at work when everything must be turned into a number. To be fair, the Common Core English Language Arts standards suggest that qualitative indicators of complexity be used along with quantitative ones. However in these systems, the quantitative measures often seem to trump the qualitative.

Carol Burris recently shared a 1st grade Pearson math test that is aligned to the Common Core standards for that grade level.

Would (or should) a 6 year old understand the question, "Which is a related subtraction sentence?" My nephew's wife, who teaches Calculus, was stumped by that one.

Keep in mind that many New York State first graders are still 5 years old at the beginning of October, when this test was given.

You can review the first grade module for yourself, and imagine any five or six year olds you might know grappling with this.

The most alarming thing is the explanation Burris offers for how these standards were defined:

If you read Commissioner John King's Powerpoint slide 18, which can be found here, you see that the Common Core standards were "backmapped" from a description of 12th grade college-ready skills. There is no evidence that early childhood experts were consulted to ensure that the standards were appropriate for young learners. Every parent knows that their kids do not develop according to a "back map"--young children develop through a complex interaction of biology and experience that is unique to the child and which cannot be rushed.

Error #5. The Common Core was designed to be implemented through an expanding regime of high-stakes tests, which will consume an unhealthy amount of time and money.

It is theoretically possible to separate the Common Core standards from an intensified testing regime, and leaders in California are attempting to do just that. However, as Bill Gates' remarks in 2009 indicate, the project was conceived as a vehicle to expand and rationalize tests on a national basis. The expansion is in the form of ever-more frequent benchmark and "formative" tests, as well as exams in previously untested subjects.

Most estimates of cost focus only on the tests themselves. The Smarter Balanced Common Core tests require the use of relatively new computers. Existing computers are often inadequate and cannot handle the "computer adaptive tests," or the new Common Core aligned curriculum packages. This was one of the reasons given to justify the expenditure of \$1 billion of construction bonds on iPads and associated Pearson Common Core aligned curriculum software in Los Angeles. The Pioneer Institute pegs the cost of full implementation of the Common Core at \$16 billion nationally - but if others follow the Los Angeles model those costs could go much higher.

The cost in terms of instructional time is even greater, so long as tests remain central to our accountability systems. Common Core comes with a greatly expanded set of tests. In New York City, a typical 5th grade student this year will spend 500 minutes (ten fifty-minute class periods) taking baseline and benchmark tests, plus another 540 minutes on the Common Core tests in the spring. Students at many schools will have to spend an additional 200 minutes on NYC Performance Assessments, being used to evaluate their teachers. Students who are English learners take a four-part ESL test on top of all of the above.

Thus testing under the Common Core in New York will consume at least two weeks worth of instructional time out of the school year. And time not spent taking tests will be dominated by preparing for tests, since everyone's evaluation is based on them.

Error #6: Proficiency rates on the new Common Core tests have been dramatically lower—by design.

Given that we have attached all sorts of consequences to these tests, this could have disastrous consequences for students and teachers. Only 31 percent of students who took Common Core aligned tests in New York last spring were rated proficient. On the English Language Arts test, about 16 percent of African American students were proficient, five percent of students with disabilities, and 3% of English Learners. Last week, the state of North Carolina announced a similar drop in proficiency rates. Thus we have a system that, in the name of "rigor," will deepen the achievement gaps, and condemn more students and schools as failures.

Because of the "rigor," many students—as many as 30 percent—will not get a high school diploma. What will our society do with the large numbers of students who were unable to meet the Common Core Standards? Will we have a generation of hoboes and unemployables? Many of these young people might find trades and jobs that suit them, but they may never be interviewed due to their lack of a diploma. This repeats and expands on the error made with high school exit exams, which have been found to significantly increase levels of incarceration among the students who do not pass them—while offering no real educational benefits.

It should be noted that the number of students (or schools) that we label as failures is not some scientifically

determined quantity. The number is a result of where the all-important "cut score" is placed. If you want more to pass, you can lower that cut score, as was done in Florida in 2012. The process to determine cut scores in New York was likewise highly political, and officials knew before the tests were even given the outcome they wanted.

Error #7: Common Core relies on a narrow conception of the purpose of K-12 education as "career and college readiness."

When one reads the official rationales for the Common Core there is little question about the utilitarian philosophy at work. Our children must be prepared to "compete in the global economy." This runs against the grain of the historic purpose of public education, which was to prepare citizens for our democracy, with the knowledge and skills to live fruitful lives and improve our society.

A group of 130 Catholic scholars recently sent a letter expressing their opposition to the Common Core. They wrote,

The sad facts about Common Core are most visible in its reduction in the study of classic, narrative fiction in favor of "informational texts." This is a dramatic change. It is contrary to tradition and academic studies on reading and human formation. Proponents of Common Core do not disguise their intention to transform "literacy" into a "critical" skill set, at the expense of sustained and heartfelt encounters with great works of literature.

Error #8: The Common Core is associated with an attempt to collect more student and teacher data than ever before.

Parents are rightfully alarmed about the massive collection of their children's private data, made possible by the US department of education's decision in 2011 to loosen the regulations of FERPA , so that student data could be collected by third parties without parental consent.

There are legitimate privacy concerns, for both students and teachers, as data, once collected, can be used for all sorts of purposes. The vision that every student's performance could be tracked from preschool through their working lives may be appealing to a technocrat like Bill Gates, but it is a bit frightening to many parents.

This is one aspect of the project that is already in big trouble. The Gates Foundation invested about \$100 million to create inBloom, a nonprofit organization that would build a system to store the massive amount of student data their reform project requires. However, as parent concerns over privacy have grown, seven of the nine states that had signed up to use the system have withdrawn. Only Illinois and New York remain involved, and in New York this week a lawsuit was filed to block the project.

Error #9: The Common Core is not based on any external evidence, has no research to support it, has never been tested, and worst of all, has no mechanism for correction.

The Memorandum of Understanding signed by state leaders to opt in to the Common Core allows the states to change a scant 15 percent of the standards they use. There is no process available to revise the standards. They must be adopted as written. As William Mathis (2012) points out,

"As the absence or presence of rigorous or national standards says nothing about equity, educational quality, or the provision of adequate educational services, there is no reason to expect CCSS or any other standards initiative to be an effective educational reform by itself."

Error #10: The biggest problem of American education and American society is the growing number of children

living in poverty. As was recently documented by the Southern Education Fund (and reported in the Washington Post) across the American South and West, a majority of our children are now living in poverty.

The Common Core does nothing to address this problem. In fact, it is diverting scarce resources and time into more tests, more technology for the purpose of testing, and into ever more test preparation.

In conclusion: Common standards, if crafted in a democratic process and carefully reviewed by teachers and tested in real classrooms, might well be a good idea. But the Common Core does not meet any of those conditions.

The Common Core has been presented as a paradigmatic shift beyond the test-and-punish policies of NCLB. However, we are seeing the mechanisms for testing, ranking, rewarding and punishing simply refined, and made even more consequential for students, teachers and schools. If we use the critical thinking the Common Core claims to promote, we see this is old wine in a new bottle, and it turned to vinegar long ago.

For all these reasons, I believe any implementation of the Common Core should be halted. The very corporations that are outsourcing good jobs are promoting the Common Core, which deflects attention from their failure to the nation's economy and their failure as good citizens. I do not believe the standards themselves are significantly better than those of most states, and thus they do not offer any real advantages. The process by which they were adopted was undemocratic, and lacking in meaningful input from expert educators. The early results we see from states that are on the leading edge provide evidence of significant damage this project is causing to students already. No Child Left Behind has failed, and we need a genuine shift in our educational paradigm, not the fake-out provided by Common Core.

The frustration evident in recent public hearings in New York is a powerful indicator of a process gone badly awry. The public was not consulted in any meaningful way on decisions to fundamentally alter the substance of teaching and learning in the vast majority of schools in our nation. This process and the content of these standards are deeply flawed, and the means by which student performance is measured continues to damage children.

This did not happen by accident. Powerful people have decided that because they have the money and influence to make things happen, they can do so. But in a democracy, the people ought to have the last word. Decisions such as this ought not be made at secret gatherings of billionaires and their employees. The education of the next generations of Americans is something we all have a stake in.

And so, fellow citizens: Speak Up, Opt Out, Teach On!

What do you think? Is it time to end the reign of Common Core errors?

The answer can only be YES!

Mr & Mrs Paul Thompson

445 Dravo St.

Beaver, Pa 15009

Beaver County

A recent book described the "Reign of Errors" we have lived through in the name of education reform. I am afraid that the Common Core continues many of these errors, and makes some new ones as well.

The Business Roundtable announced last month that its #1 priority is the full adoption and implementation of the Common Core standards. The U.S. Chamber of Commerce is likewise making a full-court press to advance the Common Core. Major corporations have taken out full-page ads to insist that the Common Core must be adopted. Many leading figures in the Republican party, like Jeb Bush, have led the charge for Common Core, as have entrepreneurs like Joel Klein. And the project has become a centerpiece for President Obama's Department of Education.

Yet in New York, the first large state to implement the tests associated with the new standards, students, parents and principals are expressing grave concerns about the realities of the Common Core. Common Core proponents like Arne Duncan have been quick to ridicule critics as misinformed ideologues or delusional paranoiacs. Defenders of the common standards, like Duncan and Commissioner John King in New York, insist that only members of the Tea Party oppose the Common Core. In spite of this, the opposition is growing, and as more states begin to follow New York's lead, resistance is sure to grow.

With this essay, I want to draw together the central concerns I have about the project. I am not reflexively against any and all standards. Appropriate standards, tied to subject matter, allow flexibility to educators. Teachers ought to be able to tailor their instruction to the needs of their students. Loose standards allow educators to work together, to share strategies and curriculum, and to build common assessments for authentic learning. Such standards are necessary and valuable; they set goals and aspirations and create a common framework so that students do not encounter the same materials in different grades. They are not punitive, nor are they tethered to expectations that yield failure for anyone unable to meet them.

The Common Core website has a section devoted to debunking "myths" about the Common Core—but many of these supposed myths are quite true. I invite anyone to provide factual evidence that disproves any of the information that follows. (And for the sake of transparency, I ask anyone who disputes this evidence to disclose any payments they or their organization has received for promoting or implementing the Common Core.)

Here are ten major errors being made by the Common Core project, and why I believe it will do more harm than good.

Error #1: The process by which the Common Core standards were developed and adopted was undemocratic.

At the state level in the past, the process to develop standards has been a public one, led by committees of educators and content experts, who shared their drafts, invited reviews by teachers, and encouraged teachers to try out the new standards with real children in real classrooms, considered the feedback, made alterations where necessary, and held public hearings before final adoption.

The Common Core had a very different origin. When I first learned of the process to write new national standards underway in 2009, it was a challenge to figure out who was doing the writing. I eventually learned that a "confidential" process was under way, involving 27 people on two Work Groups, including a significant number from the testing industry. Here are the affiliations of those 27: ACT (6), the College Board (6), Achieve Inc. (8), Student Achievement Partners (2), America's Choice (2). Only three participants were outside of these five organizations. ONLY ONE classroom teacher WAS involved—on the committee to review the math standards.

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EMBARGOED MATERIAL

Cooper, Kathy

From: dbrown@americaspublicschools.com
Sent: Wednesday, November 20, 2013 12:54 AM
To: IRRC
Subject: Vote "no" for a Research-based Policy Instead
Attachments: STATE GRADUATION REPORT.doc; PONZI SCHEME by DAVE F. BROWN.docx

November 19, 2013

Pennsylvania Independent Regulatory Review Commission.

I am an educational researcher. It is my job to study and evaluate education policies and their effects on children's and adolescents' learning and teachers' effectiveness. I have been studying the effects of testing on teaching and learning for over 20 years as an educational researcher. It was a great disappointment to me when that I heard in 2009 that Governor Rendell signed a \$200 million contract with a company to begin developing state graduation tests. The negative effects of high stakes graduation tests have a long research-based history and will affect all citizens of the Commonwealth in negative ways---from wasting our tax dollars on another unnecessary test to increasing the drop-out rate among Pennsylvania's youth (Please see my attached research on the negative effects of high school graduation tests, and my recent letter to the editor regarding the proposed \$56 million expenditure for testing purposes)

I thought that any such expenditure would at least require the approval of the legislature or the education subcommittees of each State House, or perhaps as a last stronghold, the State Education Board members. As if the NCLB testing policies haven't had enough of a negative effect on our children and public school educators, Governor Rendell subjected them both to another disgraceful education policy which as you'll see from my review of research (attached) was a negative process 30 years ago; and, will be again if not stopped by you all, members of the Pennsylvania Independent Regulatory Review Board.

Please represent our children and our adolescents as you do all you can to stop this expenditure (\$56 million approved for testing by Governor Corbett in May of this year), and policy of developing a state high school graduation test. Now is the time to say, "No" to Governor Corbett and those legislators who approved such a disastrous educational plan that has no data to support its implementation. Your approval of this absurd traditional practice will waste the state taxpayers' monies and ruin the educational lives of many students and teachers. Show the power you can have by standing up to stop this policy. Approving these Keystone tests will once again place complete control of the teaching profession and children's learning into the hands of the testing companies, whose past and present intrusion into the education profession are creating a culture of dismay, dissatisfaction, and ill-preparing youth for the kind of adult learners we as parents want our children to become.

Please contact me at the addresses below if you wish to hear more about the research.

Sincerely,

Dr. Dave F. Brown, Educational Researcher

16 W. Montgomery Ave. #18 Ardmore, PA 19003

610.812.3556

dbrown@americaspublicschools.com

Father of a current 16 year-old public school student

Author of numerous books, research articles, & book chapters on educational issues, including research on the negative effects of state tests.

Latest book: ***Why America's Public Schools Are the Best Place for Kids: Reality vs. Negative Perceptions*** (2012)

Report on High Stakes Graduation Tests and Their Impact on Graduation Rates

Introduction

Several states have added a high stakes test as a requirement for graduating from high school. Massachusetts, California, and New York are notable states that have implemented such tests within the past five years as a condition of graduation. A total of 23 states currently use high stakes exit tests as a precondition to graduating from high school, and at least three other states plan to phase in graduation examinations over the next few years (Rosenthal, 2008).

Minimal Competency:

Using tests as a criterion for graduation is not a recent phenomenon. Several states implemented graduation examinations, labeled as minimal competency tests (MCTs), during the late 1970s and early 80s (Brown, 1990). The reason that they were titled "minimum competency tests" (MCTs) is due to the fact that the tests generally assessed a minimal level of academic skills that students should learn during their schooling careers. Much like the current rash of graduation examinations, these tests were designed to cover content that high school students generally learn in ninth and tenth grades, rather than content covered during the last two years of high school. In those states with MCTs, many teachers reported that they were forced to spend more time on a limited curricular content at the expense of what they believed were other more important areas (Brown, 1990; Dorr-Bremme et al., 1983; Rottenberg & Smith, 1990). Current graduation examinations are also first given during the ninth and tenth grades with opportunities for retaking the examinations several times before students eventually either drop out of school or graduate.

Initial Financial Impact to States and Local School Districts:

Academically challenged high school students must receive frequent and specific instruction and remediation to reach success on these tests that are often offered to students first during their freshman year. If students fail, then they receive remediation for the remainder of their years in high school until they hopefully receive a passing score. These initial failures mean that high schools must be staffed with additional teachers to provide additional courses to remediate those students who fail the test. Students forced into these remedial courses receive limited curricular offerings since they must take remedial courses to improve the basic skills assessed by the tests. Many states (including Pennsylvania for the PSSAs) offer test preparation materials to students and teachers, at a cost to school districts. The more tests required/mandated by state legislators the more money the schools and the state tax payers must spend for the following:

- 1) designing the tests
- 2) printing and distributing the tests
- 3) retrieving tests from school sites
- 4) scoring the tests
- 5) providing specially designed print-outs of the test results for schools
- 6) distributing the results of tests to educators and parents in all the

communities.

Indiana's Department of Education reported that it cost the state \$557 per student to maintain the state's current level of performance on the graduation test, and Texas noted that it spent \$2 million for personalized study guides for students who did not initially pass parts of their state exit examination. Teachers may need additional training to help students successfully pass these tests, and in Massachusetts, it costs tax payers an additional \$101 per student to train the teachers (Rosenthal, 2008).

Narrowing the Curriculum While Ignoring Thinking Processes:

Other obvious costs include the time that teachers devote to test preparation rather than teaching those concepts/principles needed for adult success either as a future college student or in entering the work force at age 18. It is not unusual for teachers to spend approximately four-to-six weeks of the school year preparing students to succeed on state mandated tests (Rottenberg & Smith, 1990).

Teachers are spending this much time preparing students for one simple test, how much time are students missing out on learning concepts that are much more significant to them, for now and for their futures.

When students and teachers are held accountable on one high stakes test, the result is an obvious narrowing of the curriculum, so that students receive fewer opportunities to study more needed and meaningful content.

High stakes tests generally have been found to encourage poorer quality teaching that discourages student motivation due to an emphasis on basic skills rather than higher order thinking and critical thinking problem solving.

(Brown, 1990). Marzano and Costa (1988) found in analyzing questions from two standardized achievement tests that the tests only required students to use 9 of a possible 22 cognitive operations; only the skills of comparing and contrasting and retrieving information were necessary to answer every question. FairTest (2007) reported that narrowing the curriculum most frequently occurs with low-income students in which students receive test coaching that fails to prepare them for further learning during their high school years. Often the library budgets are spent on test preparation materials instead of books or other needed educational materials.

Consider that employers desire the following traits from students as they enter the world of work:

- Adaptive problem solving
- Assessing and responding to risk
- Managing distraction and giving mindful, rotating attention to tasks
- Working alone, with self-management
- Playing changeable roles in real or virtual teams and groups (Baker, 2007, p. 313).

How can high schools best help their students develop these competencies? Preparing for a series of standardized high stakes tests is unlikely to encourage this type of cognitive growth.

Effects on Graduation Rates:

According to the National Board on Educational Testing and Public Policy in 1986 those states with MCTs were more likely to have the highest dropout rates. The Board noted that year that nine of ten states with the highest dropout rates used an MCT as a requirement for graduation. In 1996, researchers Griffin and Heidorn and the Florida Department of Education noted that students who failed the Florida MCT were more likely to drop out even though they were receiving passing grades in their classes at the time of the test administration. In a study conducted by assessment researchers from Boston College, the authors noted that "in schools with proportionality more students of low socioeconomic status that used high stakes MCTs, early dropout rates – between the 8th and 10th grades – were four to six percentage points higher than similar schools without high stakes tests" (Clarke, Haney, & Madaus, 2000, p 2). Jacob (2001), from Harvard University, discovered that dropout rates are approximately 6.5 % greater among students in the bottom scoring achievement test quintile in those states that use high stakes graduation examinations than in those states without graduation tests. Two researchers at the Pennsylvania State University used the National Educational Longitudinal Study (NELS) data to reveal that the use of an eighth grade promotion test is strongly associated with increased probability of students dropping out before tenth grade (Reardon & Galindo, 2002).

More recently, graduation examinations in the Commonwealth of Massachusetts have had the impact of slightly increasing the dropout rates of high school students, particularly in urban districts (Wheelock, 2004). New York State dropout rates also increased slightly following the implementation of required Regent's examinations for all students in Language Arts/English, Mathematics, Global History, and American History (Warren, 2005). It is notable that dropout rates have increased, especially in urban areas of New York State: particularly Rochester and Buffalo. In another study, following the implementation of minimally required scores on the Regent's separate content area examinations New York City's dropout rate was found to reach 20% in 2002; up from 15% for the class of 1998 (Rankin, 2003). Warren discovered that across several states studied that the effect of exit examinations was the decrease in graduation rates by .77 percent.

Graduation rates and dropout data are often reported more accurately by researchers who are not employed by state departments of education. Many of these state department personnel report more positive data regarding their graduation rates as a way to justify using graduation examinations and a strategy to imply that these states are meeting NCLB guidelines for successful student performance. For instance, Rankin (2003) cited a Cornell University survey in which 45% of *superintendents* from low-performing New York school districts reported an increase in dropouts two years following the implementation of more challenging Regents tests. Warren (2005) reported that state departments of education are using figures from Common Core Data (CCD) which "... are biased by migration, changes in cohort size, and/or grade retention" (p. 1).

Other researchers have noted the challenge of identifying the reasons and isolating the variables responsible for students' decisions to dropout. Rabinowitz, Zimmerman, and Sherman (2001) stated,

It is almost impossible to demonstrate a causal connection between any single factor and a decision to drop out of school. Several factors correlate with dropping out, including being held back and being too old for a grade and having a history of poor academic achievement as reflected in grades and test scores. While a test may be the immediate trigger of a student's decision to drop out, the test results may simply aggravate or reflect a history of poor performance. (p. 3)

"Push Outs" or Dropouts?

The Houston, Texas schools are infamous for noting that during one exceptional academic year (2002) they had "no dropouts." A few months later, investigative reporters revealed that the Houston District falsely reported that almost 3,000 high school students had "moved away" or "transferred" instead of dropped out (Hancock, 2005). In another Houston circumstance, many Black and Latino students were retained in ninth grade for several years to prevent them from having to take the tenth grade graduation examination. Many of those students who repeated ninth grade eventually dropped out in large numbers.

When students can be encouraged to leave school voluntarily they are often not reported as "dropouts," thus revealing greater success by school districts. These strategies are occurring today in several places, particularly chosen by those schools who see no hope in making Adequate Yearly Progress (AYP) as required by No Child Left Behind (NCLB) policies. By choosing another way to encourage students to leave school, districts do not have to admit that students are actually "dropping out" as per legislative definition.

High Stakes Testing's Effects on Students of Color and Low Socioeconomic Status:

In a report issued by the California Group ERASE, Applied Research Center, the authors reported, "In virtually every state that has implemented high school exit exams, a disproportionate number of those who have passed all other requirements but fail to graduate, or must go into the world with a certificate of completion instead of a diploma, are students of color" (Gordon & Della Piana, 1999, p. 3). A report by Holmes (1999) revealed that state education personnel in Massachusetts decided to lower the passing grade on the Massachusetts graduation examination based on the finding that "... (M)ore than three quarters of Latinos and Blacks would be denied a diploma under a higher standard" (p. 2). Another researcher discovered that ACLU statistics confirmed that 65% of low income students were failing the tests while only 12% of affluent students failed (Weaver Dunne, 2001).

High Stakes Testing Effects on English Language Learners (ELLs):

"In 2004, 9.9 million school age children spoke a language other than English at home, representing 19 percent of all children in this age group" (Lapkoff & Li, 2007, p. 11). Hernandez (2006) reported that in 2005, one in five children eight years old or younger in the United States was Hispanic. From 1993 to 2003, the enrollment of English language learners in America's public schools grew by 84%, much more than the 11% growth of the entire student population (The Associated Press, 2007). This varied language and ethnic diversity among United States' student population creates numerous challenges for American's public school teachers.

All of these immigrant students don't enter school conveniently at the age of 5 and receive a full 13 years of American schooling. They enter our public schools daily at all grade levels bringing with them varied background experiences with formal schooling---some receiving several early years of schooling in their native lands, and others having never attended school at all before entering America at the age of 10 or 12 or 16. Each separate ethnic group brings with them numerous cultural perspectives on their responsibilities in receiving an education and their need to graduate or dropout and earn money from the age of 16, or to marry by the age of 17, or return to their homeland before they graduate.

Some of these students are not academically prepared to succeed in our schools (Cary, 2000). The adoption and implementation of high stakes exit examinations by state legislative bodies have the effect of encouraging these immigrant students to leave school early rather than spend additional years in school to improve their job related skills and chances for further academic study.

Impact on The Commonwealth's Future Economy

Despite good intentions, the implementation of high school examinations as a criterion for graduation is likely to have a detrimental economic impact on the Commonwealth. Less students graduating creates the problem of fewer economic opportunities for those who drop out. Adolescents who do not receive diplomas are more likely to

- enter the work force without the skills needed for employment success;
- work without health care for them or future family members;
- need additional training to succeed at their jobs at a cost to their employers;

- need possibly future support from the Commonwealth for unemployment benefits later in their lives;
- possibly enter a future GED program thus costing the Commonwealth more money to educate the student.

Receiving a high school diploma has innumerable benefits for Pennsylvania's youth. Legislating high stakes tests will not improve the circumstances for our youth or our educational system. Any educational legislative policy/law should have the impact of providing the following in educational settings:

1. improve the opportunities for educators to become better teachers

and

2. improve students' opportunities to learn better and more.

High school graduation examinations will NOT provide teachers or students with improved learning or better instructional advantages.

Report on High School End-of-Course Assessments

Tests that are given at the end of specific high school courses are often called *end-of-course exams* (EOCs) and differ from high stakes comprehensive examinations that are single standardized tests given at one point in time to high schoolers based on literacy and mathematics courses. EOC examinations assess students' mastery of the concepts and principles covered only in those specific courses. Students may take these tests for example in their Algebra I course, or basic English Literature class. Various states require students to take from as few as two to as many as fifteen EOCs prior to graduation (High School Leadership Summit paper, 2004). The U. S. Department of Education reported that as many as 15 to 20 states will soon be using EOCs as requirements for graduation.

Since these tests are easily aligned well with course content their validity is insured. Nine southern states use these end-of-course examinations including Maryland and Delaware. The state of Georgia has decided to post end-of-course examinations on students' transcripts. North Carolina has tied these test scores to students' final course grades in which the scores may count for as much as 20% of a student's grade for those core subject areas. North Carolina also permits students to take each EOC test a total of three times. New Jersey permits students who don't pass to show their portfolio of work and receive a diploma in that alternative manner. California legislators drafted a bill to propose a similar portfolio as an alternative to traditional exit examinations (Rosenthal, 2008).

Few studies have been conducted on the effectiveness of EOCs to improve students' learning or educators' instructional processes. Bishop, Mane, and Bishop (1998) from Cornell University believe that EOCs are promising; but they used international test comparisons to support their viewpoints. To high school students, EOCs represent another high stakes test that determines for many that they should leave school the first time they experience failure with the tests.

While it may occur on the surface that EOCs are a more reliable method of insuring teacher and student accountability than externally designed standardized tests, this type of assessment also pressures teachers to narrow curricula to those concepts and principles that can only be assessed with a multiple choice standardized test format.

These types of assessment prevent students from demonstrating their learning in ways that reflect their overall cognitive growth—particularly in the thinking processes (e.g., critical and creative thinking, problem solving, research skills, decision making, and metacognitive strategies).

If EOCs are required to be passed for graduation, the academic year will be focused, in a curricular sense, on a limited number of principles that can only be assessed in a standardized format. If teachers must help all students pass EOCs then remediation becomes another time consuming responsibility for each classroom teacher, thus narrowing the curriculum as much as a comprehensive graduation high stakes test does. High school teachers who are responsible for EOCs will be forced to ask the question each week, "How much time do I need to spend on preparing my students for the EOC this week, rather than teaching in a manner that encourages critical thinking, problem solving, team building, and student generated research activities?"

The professional literature and cognitive learning research base is replete with strategies for improving students' learning through the use of "differentiated instruction, curriculum, and assessment." The primary purpose of differentiated teaching is to meet the many diverse learning profiles and cognitive backgrounds of the students who enter the schools each day through varied instructional strategies. To do less would be failing all students. Differentiation is required by law for students who have learning disabilities of any kind via a student's Individualized educational program (IEP).

Accountability for educators means meeting the cognitive developmental needs of each student who enters the classroom each day. Teachers don't need legislators or state department of education personnel to hold them accountable—they have numerous students on a daily basis who hold them accountable as students demand their teachers help them learn something (to grow each day) in each class. The *Standards for Educational and Psychological Testing* promoted by the American Educational Research Association (AERA), the American Psychological Association (APA), and the National Council on Measurement in Education state that "In educational settings, a decision or characterization that will have a major impact on a student should not be made on the basis of a single test score." (AERA, 2000). Four years of high school with several teachers in several content areas can yield many alternative measures to determine a student's ultimate fate as either a graduate or non-graduate of high school

much better than any high stakes standardized assessments or end of course examinations. Educators at all levels are fully aware of the value of their professional decision making and autonomy in determining whether their students have successfully learned the primary concepts and principles inherent in their content areas without the use of an external assessment.

Decisions about whether or not students are learning should not take place in the legislature, the governor's office, or the department of education. They should take place in the classroom, because that is where learning occurs.

(Douglas Christensen cited in Roschewski, Gallagher, and Isernhagen, 2001, p. 611)

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Pennsylvania's \$56 Million Ponzi Scheme

The Pennsylvania State Board of Education recently approved regulations requiring students that graduate from high school by 2017 pass the Keystone examinations. On the same day the Allentown School District announced that it may eliminate 161 teaching jobs before next year. Both of these events occurred a mere six weeks after Governor Corbett revealed his education budget proposals and are inextricably linked by a common misconception---*that testing students is more likely to improve learning than reducing class size*. The most controversial aspect of the education budget, the \$56 million proposed expenditure for testing Pennsylvania's students, will not even be questioned by legislators or most taxpayers. Educators comprehend the fecklessness of these tests; as do children and adolescents; so why can't reasoned adults?

Twenty years ago, millions of U. S. adolescents graduated from high school, and pursued further education or began their careers. Those graduates are now almost 40 years-old; and they can proudly say that their academic successes, career choices, economic fortunes, and overall happiness have not been negatively affected in any way by foregoing high stakes standardized tests. Yet, many adults who espouse economic conservatism (including the Governor and many state legislators) won't question spending \$56 million of our taxes on simple-minded, multiple-guess tests. Education professionals—teachers and administrators— who question this economic largesse, know testing has no positive effect on students' learning.

Because of No Child Left Behind legislation, alleged "education reformers," and testing companies strangle-hold standardized tests now guide philosophy, research, teaching practices, and the endpoint of every educational decision made. Teachers realize now more than ever that they have lost control of the profession—lost control of designing creative, vibrant, exciting learning experiences for the children and adolescents they entered the profession to inspire. Teachers have lost control of the independency required to design learning experiences that match the needs of each and every student—decisions that should be made only by professional educators.

Every teacher and administrator knows that a single test on a single day of a 180 day cycle of learning is incapable of demonstrating what students can do, what they know, what their academic strengths are, and what assistance they need to genuinely progress to the next stage of cognitive growth. Before the 1980s, teachers, the professionals in the education business, determined what students needed to know, chose instructional materials, determined the pace at which their classes needed to move to master material, designed their own tests, spent time getting to know students, and used some days to discuss current events that affected the lives of their students.

Economists, politicians, test design companies, and some of the public inaccurately believe that without external testing students will never grow, and as a result, we'll be wasting our taxes on an education system that doesn't work. *According to*

Written by Dr. Dave F. Brown, Educational Researcher, author of *Why America's Public Schools Are the Best Place for Kids: Reality vs. Negative Perceptions* (2012)

education research, however, they're all wrong. The testing movement *has not* improved academic success, doesn't encourage cognitive growth, and hasn't prevented students from dropping out. In fact, the testing movement has increased the dropout rate, particularly when passing tests is a requirement for graduation.

What does work as noted by respected researchers in the field of education and corroborated by teachers is preschool experiences for all children; full day kindergarten; lower student-to-teacher ratios; university-educated, certified teachers in every classroom; ongoing professional development; and teachers with master's degrees.

If the \$56 million proposed for testing were instead distributed evenly to each of the 500 school districts in Pennsylvania, each district could hire three teachers at a beginning salary of just under \$40,000. Lowering student-to-teacher ratios has a significant effect on student growth—one that far exceeds designing tests, purchasing tests, shipping tests to schools, buying test preparation materials, scoring tests, distributing tests results, and wasting teachers' and students' time preparing for tests.

When politicians finally initiate conversations with education professionals about what students need to be successful, then they'll hopefully begin to make educational policy and budget decisions that positively affect children's growth. Until then, politicians are wasting \$56 million of state taxpayers' money on testing rather than lowering class size—a financial value that will lead to the same return as investing in Bernie Madoff's Ponzi scheme.

Regulation #6-326 (IRRC #2976)
State Board of Education
Academic Standards and Assessment

Larry Wittig, Chairman
State Board of Education

Stephanie Jones

Date: 11-20-13

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 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

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 Agency: House Education Committee
 Phone: 783-3154
 Fax: 705-1854
 Date: 11/29/13
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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable James Roebuck, Minority Chairman
Agency: House Education Committee
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Fax: 783-1665
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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Mike Folmer, Chairman
Agency: Senate Education Committee
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Agency: Senate Education Committee
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EMBARGOED MATERIAL

Cooper, Kathy

RECEIVED

IRRC

From: bfoxart@aol.com
Sent: Wednesday, November 20, 2013 11:11 AM
To: IRRC
Subject: Keystone Exams

2013 Nov 20 11:13

To those deciding on the implementation of Keystone Exams,

As a Montessori teacher and a member of the Tredyffrin/Easttown School District I want to express my huge disappointment with the plan to implement the Keystone Exams as a requirement for high school graduation. First of all, the requirements seem quite arbitrary: Algebra 1, Biology, and Literature. They could have been Geometry, U S History and Creative Writing, or any other combination of standards.

We are all lifetime learners on our own paths towards our individual futures. What may turn out to be important to one student may matter little to another in the grand scheme of life. Montessori teaches "Follow the Child." Why aren't our PA public schools doing that?

Our children in the public schools are already tested to death, to the great detriment of their education and school experience. Testing, in any form, is stressful, and only, in some instances, does it measure success. We have educated our teachers to educate children and then taken away their ability to do so. By requiring the Keystone Exams we are belittling the efforts of our teachers and stealing precious time they spend with their students. We are also decreeing that only certain subjects are important, when there is clear evidence that music, the arts and physical education are as important to analytical and creative thinking as math and science. The Keystone Exams seem to me a completely arbitrary way to measure a high school education and in no way take into account each child's and teacher's unique talents.

Sincerely,

Barbara Fox
604 Vassar Rd.
Strafford, PA 19087

EMBARGOED MATERIAL

Common Core, The Dumbing Down of Students (fact or fiction)?

Why does Arne Duncan and the progressives want our children at the youngest age possible, for them to be kept in the public school system as many years as possible, adding hours to the school day? Research him on any search engine.

I have been a recruiter and enrollment officer visiting parents and students in homes all over this state. I have heard many stories of the failures of the school system across the state of Pa.. I have also been in a position to look at test results for entrance exams and I know most students would struggle doing tests in the required time given. This will especially hurt them when getting any employment. THE STATE IS FAILING THEM.

When my son was in the 5th grade, he is in 9th now, I noticed him one night doing simple adding, subtracting, dividing, multiplying and I asked why he was doing it the way he was. It seemed to be taking forever and he was struggling with it. He explained it was the way they were taught by requirement of the school district. I sat down and copied the problems on paper and did them the (old way), the (correct way) and finished them all while he was doing a few. Why would a student be taught this (so called) new math? My son has always been at the top of grades in school, speaks two languages one of which is the second hardest in the world to Chinese, Hungarian, and scores very well on PSSA tests, unlike the majority of students in this state. I invite you to talk to him about any topic or subject and compare him to a public school student.

Why? I took him out of public school that year, placed him in cyber school and cyber school combined with my son wanting to learn well outside of the way things are taught is why. Parental input and direction, the courage to take him out of a failing system designed by intent to fail, into cyber school with different guideline possibility and combined effort of the student seeing the fun in learning a lot, right!

Pennsylvania, being the historical state we are should stand proud to say NO THANKS ARNE, NO THANKS FEDERAL GOVERNMENT, OUR STUDENTS ARE GOING TO BE KNOWN AS EDUCATED FROM THE STATE OF PENNSYLVANIA TO EMPLOYERS AND CONTINUED EDUCATION SCHOOLS OF THEIR CHOICE AFTER THEY GRADUATE.

Folks, do you want these Pa. kids being the next ones you see on t v being interviewed and appearing so dumb all you can do is shake your head and laugh and then realize how sad it is?

IT'S TIME TO STAND UP FOR THE STUDENTS, FIX THE SCHOOL SYSTEMS AND DISTRICTS AND SAY NO TO COMMON CORE.

Dwight Blake
69 Griffith Rd.
Delta, Pa. 17314

wdblake6349@yahoo.com

Submitted
08/11/15
11:05

EMBARGOED MATERIAL

Cooper, Kathy

From: Dwight Blake <wdblake@armstongmywire.com>
Sent: Wednesday, November 20, 2013 10:14 AM
To: IRRC
Subject: I would like to speak at the meeting on Common Core.

I have been a recruiter and enrollment officer for different schools. I have been an employer looking at tests done by students of the Pa. school system. I did not realize how much dumbing down had been done until I experienced it with my own son, now 15. In 5th grade I noticed him doing math, simple subtracting, adding, dividing, multiplying. The way they are teaching it to be done is wrong. I timed it. I did several, the old way, the correct way, while he did one. My son has been honor roll material the whole time he has been in school, scores very high on PSSA because he is taught the right ways to learn out of the system. In many subjects, including math, they are not being prepared to take employment tests and entrance tests within the required time given resulting in poor performance. Common Core structure is why percentages are off. Take the PSSA tests and you will see.

I removed my son from the public school system and put him in cyber school. Would you like to interview him and discuss any subject you can think of and compare him to any student you can find in the system?

Dwight Blake

717-578-9594
69 Griffith Rd.
Delta, Pa. 17314

2013
11/20/13
10:14 AM

Cooper, Kathy

EMBARGOED MATERIAL

From: SCHOF4@comcast.net
Sent: Wednesday, November 20, 2013 11:02 AM
To: IRRC
Subject: Keystone Exams

Please do not enact requirements related to the proposed Keystone Exams. The majority of our high schools are providing an excellent education for our children. The addition of even more standardized tests to a system already forced to forgo valuable curriculum to dedicate time to teaching to the tests will degrade the programs, not enhance them. The further burden of an unfunded mandate just makes it that much worse. This is a good idea gone wrong, and it must not be foisted off on our children.

Tami and Gary Schofield
495 Hilltop Road
Paoli, PA

2013 11 20 11:02 AM
SCHOOF4@COMCAST.NET

EMBARGOED MATERIAL

Cooper, Kathy

Sent: Wednesday, November 20, 2013 9:14 AM
To: IRRC
Subject: FW: Academic Standards & Assessments. Regulation #6-326 (IRRC #2976)
Importance: High

.....
From: teddi [mailto:teddit@cox.net]
Sent: Tuesday, November 19, 2013 10:13 PM
To: IRRC
Subject: Academic Standards & Assessments. Regulation #6-326 (IRRC #2976)
Importance: High

Sent from Samsung tablet

----- Original message -----

Subject: Academic Standards & Assessments. Regulation #6-326 (IRRC #2976)
From: teddi <teddit@cox.net>
To: fwilmarth@irrc.state.pa.us
Cc: IRRC@IRRC.STATE.PA.US

We do NOT support The PA Common Core Standards.

We have spent many hours researching to get to the truth regarding CCSS.

We couldn't have expressed our concerns any better than teacher Anthony Cody did in this article.

Anthony Cody spent 24 years working in Oakland schools, 18 of them as a science teacher at a high needs middle school. He is National Board certified, and now leads workshops with teachers focused on Project Based Learning. With education at a crossroads, he invites you to join him in a dialogue on education reform and teaching for change and deep learning. For additional information on Cody's work, visit his Web site, Teachers Lead. Or follow him on Twitter.

Common Core Standards: Ten Colossal Errors

By Anthony Cody on November 16, 2013 6:18 AM

A recent book described the "Reign of Errors" we have lived through in the name of education reform. I am afraid that the Common Core continues many of these errors, and makes some new ones as well.

The Business Roundtable announced last month that its #1 priority is the full adoption and implementation of the Common Core standards. The U.S. Chamber of Commerce is likewise making a full-court press to advance

the Common Core. Major corporations have taken out full-page ads to insist that the Common Core must be adopted. Many leading figures in the Republican party, like Jeb Bush, have led the charge for Common Core, as have entrepreneurs like Joel Klein. And the project has become a centerpiece for President Obama's Department of Education.

Yet in New York, the first large state to implement the tests associated with the new standards, students, parents and principals are expressing grave concerns about the realities of the Common Core. Common Core proponents like Arne Duncan have been quick to ridicule critics as misinformed ideologues or delusional paranoiacs. Defenders of the common standards, like Duncan and Commissioner John King in New York, insist that only members of the Tea Party oppose the Common Core. In spite of this, the opposition is growing, and as more states begin to follow New York's lead, resistance is sure to grow.

With this essay, I want to draw together the central concerns I have about the project. I am not reflexively against any and all standards. Appropriate standards, tied to subject matter, allow flexibility to educators. Teachers ought to be able to tailor their instruction to the needs of their students. Loose standards allow educators to work together, to share strategies and curriculum, and to build common assessments for authentic learning. Such standards are necessary and valuable; they set goals and aspirations and create a common framework so that students do not encounter the same materials in different grades. They are not punitive, nor are they tethered to expectations that yield failure for anyone unable to meet them.

The Common Core website has a section devoted to debunking "myths" about the Common Core—but many of these supposed myths are quite true. I invite anyone to provide factual evidence that disproves any of the information that follows. (And for the sake of transparency, I ask anyone who disputes this evidence to disclose any payments they or their organization has received for promoting or implementing the Common Core.)

Here are ten major errors being made by the Common Core project, and why I believe it will do more harm than good.

Error #1: The process by which the Common Core standards were developed and adopted was undemocratic.

At the state level in the past, the process to develop standards has been a public one, led by committees of educators and content experts, who shared their drafts, invited reviews by teachers, and encouraged teachers to try out the new standards with real children in real classrooms, considered the feedback, made alterations where necessary, and held public hearings before final adoption.

The Common Core had a very different origin. When I first learned of the process to write new national standards underway in 2009, it was a challenge to figure out who was doing the writing. I eventually learned that a "confidential" process was under way, involving 27 people on two Work Groups, including a significant number from the testing industry. Here are the affiliations of those 27: ACT (6), the College Board (6), Achieve Inc. (8), Student Achievement Partners (2), America's Choice (2). Only three participants were outside of these five organizations. ONLY ONE classroom teacher WAS involved—on the committee to review the math standards.

This committee was expanded the next year, and additional educators were added to the process. But the process to write the standards remained secret, with few opportunities for input from parents, students and educators. No experts in language acquisition or special education were involved, and no effort was made to see how the standards worked in practice, or whether they were realistic and attainable.

David Coleman is credited publicly as being the "architect" of the process. He, presumably, had a large role in writing the English Language Arts standards; Jason Zimba of Bennington College was the lead author for the math standards. Interestingly, David Coleman and Jason Zimba were also members of Michelle

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The process for adopting the Common Core was remarkably speedy and expedient. Once the standards were finalized and copyrighted, all that was required for states to adopt them were two signatures: the governor and the state superintendent of education. Two individuals made this decision in state after state, largely without public hearings or input. Robert Scott, former state Commissioner of Education in Texas, said that he was asked to approve the standards before there was even a final draft.

The Common Core process could not have been directly paid for by the federal Department of Education, which is prevented by law from enacting or promoting national standards. So Bill Gates footed the bill. The Gates Foundation has, so far, paid \$191 million to develop and promote the Common Core. Of that sum, \$33 million was earmarked for the development of the Common Core. The remaining \$158 million was spent on myriad organizations to buy their active support for the standards—with \$19 million awarded just in the past month. Many of the voices in the public arena, including teacher unions, the national PTA, journalistic operations like John Merrow's Learning Matters, and the National Catholic Educational Association, have received grants for such work.

Although specifically prohibited from interfering in the curriculum or instruction in the nation's classrooms, the federal Department of Education has used threats and bribes to coerce states to adopt Common Core. Indeed, the active role of the U.S. Department of Education in supporting, advocating for, and defending the Common Core may be illegal, as may the Department's award of \$350 million to develop tests for the Common Core. The Department might reasonably argue that it was appropriate to encourage the development of "better" tests, but in this case the tests were specifically intended to support only one set of standards: the Common Core.

Public Law 103-33, General Education Provisions Act, sec 432, reads as follows:

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In spite of this prohibition, Race to the Top gave major points to states that adopted "college and career ready standards" such as Common Core.

Here is what the Memorandum of Understanding that state officers were asked to sign said about federal support:

...the federal government can provide key financial support for this effort in developing a common core of state standards and in moving toward common assessments, such as through the Race to the Top Fund authorized in the American Recovery and Reinvestment Act of 2009. Further, the federal government can incentivize this effort through a range of tiered incentives, such as providing states with greater flexibility in the use of existing federal funds, supporting a revised state accountability structure, and offering financial support for states to effectively implement the standards.

When the Department of Education announced Race to the Top there was a complex application process with a short timeline. The Gates Foundation created a process where their staff would assist states in applying for RtT

grants. In order to receive this help, state leaders had to fill out a qualifying questionnaire. The first question on the qualifying criteria questionnaire is, "Has your state signed the MOA regarding the Common Core Standards currently being developed by NGA/CCSSO? [Answer must be "yes"]"

Thus, the Gates Foundation worked within the Race to the Top process to apply additional pressure on states to sign on to the Common Core.

Coming at a time when state education budgets were under great pressure, these inducements were significant in overcoming any hesitations on the part of most governors. The pressure continues, as NCLB waivers depend on the adoption of "college and career ready standards," which are most readily provided by the Common Core.

It is also worth noting that alongside the adoption of Common Core standards, both Race to the Top and NCLB waivers being issued by the Department of Education require states to include test scores in the evaluations of teachers and principals. This is a package deal.

Error #2: The Common Core State Standards violate what we know about how children develop and grow.

One of the problems with the blinkered development process described above is that no experts on early childhood were included in the drafting or internal review of the Common Core.

In response to the Common Core, more than 500 experts signed the Joint Statement of Early Childhood Health and Education Professionals on the Common Core Standards Initiative. This statement now seems prophetic in light of what is happening in classrooms. The key concerns they raised were:

1. Such standards will lead to long hours of instruction in literacy and math.
2. They will lead to inappropriate standardized testing
3. Didactic instruction and testing will crowd out other important areas of learning.
4. There is little evidence that such standards for young children lead to later success.

Many states are now developing standards and tests for children in kindergarten, 1st grade, and 2nd grade, to "prepare" them for the Common Core. Early childhood education experts agree that this is developmentally inappropriate. Young children do not need to be subjected to standardized tests. Just recently, the parents of a k-2 school refused to allow their children to be tested. They were right to do so.

Error #3: The Common Core is inspired by a vision of market-driven innovation enabled by standardization of curriculum, tests, and ultimately, our children themselves.

There are two goals here that are intertwined. The first is to create a system where learning outcomes are measurable, and students and their teachers can be efficiently compared and ranked on a statewide and national basis. The second is to use standardization to create a national market for curriculum and tests. The two go together, because the collection of data allows the market to function by providing measurable outcomes. Bill Gates has not spoken too much recently about the Common Core, but in 2009, he was very clear about the project's goals.

He said that

...identifying common standards is just the starting point. We'll only know if this effort has succeeded when the curriculum and tests are aligned to these standards. Secretary Arne Duncan recently announced that \$350

million of the stimulus package will be used to create just these kinds of tests - "Next Generation assessments," aligned to the Common Core. When the tests are aligned to the common standards, the curriculum will line up as well. And it will unleash a powerful market of people providing services for better teaching. For the first time, there will be a large, uniform base of customers looking at using products that can help every kid learn, and every teacher get better.

This sentiment was shared by the U.S. Department of Education, as was made clear when Arne Duncan's Chief of Staff, Joanne Weiss, wrote this in 2011:

The development of common standards and shared assessments radically alters the market for innovation in curriculum development, professional development, and formative assessments. Previously, these markets operated on a state-by-state basis, and often on a district-by-district basis. But the adoption of common standards and shared assessments means that education entrepreneurs will enjoy national markets where the best products can be taken to scale.

In the market-driven system enabled by the Common Core, the "best products" will be those which yield the highest test scores. As Gates said: "The standards will tell the teachers what their students are supposed to learn, and the data will tell them whether they're learning it."

Thus, the overriding goal of the Common Core and the associated tests seems to be to create a national marketplace for products. As an educator, I find this objectionable. The central idea is that innovation and creative change in education will only come from entrepreneurs selling technologically based "learning systems." In my 24 years in high poverty schools in Oakland, the most inspiring and effective innovations were generated by teachers collaborating with one another, motivated not by the desire to get wealthy, but by their dedication to their students.

Error #4: The Common Core creates a rigid set of performance expectations for every grade level, and results in tightly controlled instructional timelines and curriculum.

At the heart of the Common Core is standardization. Every student, without exception, is expected to reach the same benchmarks at every grade level. Early childhood educators know better than this. Children develop at different rates, and we do far more harm than good when we begin labeling them "behind" at an early age.

The Common Core also emphasizes measurement of every aspect of learning, leading to absurdities such as the ranking of the "complexity" of novels according to an arcane index called the Lexile score. This number is derived from an algorithm that looks at sentence length and vocabulary. Publishers submit works of literature to be scored, and we discover that Mr. Popper's Penguins is more "rigorous" than Steinbeck's Grapes of Wrath. Cue the Thomas B. Fordham Institute to moan that teachers are not assigning books of sufficient difficulty, as the Common Core mandates.

This sort of ranking ignores the real complexities within literature, and is emblematic of the reductionist thinking at work when everything must be turned into a number. To be fair, the Common Core English Language Arts standards suggest that qualitative indicators of complexity be used along with quantitative ones. However in these systems, the quantitative measures often seem to trump the qualitative.

Carol Burris recently shared a 1st grade Pearson math test that is aligned to the Common Core standards for that grade level.

Would (or should) a 6 year old understand the question, "Which is a related subtraction sentence?" My nephew's wife, who teaches Calculus, was stumped by that one.

Keep in mind that many New York State first graders are still 5 years old at the beginning of October, when this test was given.

You can review the first grade module for yourself, and imagine any five or six year olds you might know grappling with this.

The most alarming thing is the explanation Burris offers for how these standards were defined:

If you read Commissioner John King's Powerpoint slide 18, which can be found [here](#), you see that the Common Core standards were "backmapped" from a description of 12th grade college-ready skills. There is no evidence that early childhood experts were consulted to ensure that the standards were appropriate for young learners. Every parent knows that their kids do not develop according to a "back map"--young children develop through a complex interaction of biology and experience that is unique to the child and which cannot be rushed.

Error #5: The Common Core was designed to be implemented through an expanding regime of high-stakes tests, which will consume an unhealthy amount of time and money.

It is theoretically possible to separate the Common Core standards from an intensified testing regime, and leaders in California are attempting to do just that. However, as Bill Gates' remarks in 2009 indicate, the project was conceived as a vehicle to expand and rationalize tests on a national basis. The expansion is in the form of ever-more frequent benchmark and "formative" tests, as well as exams in previously untested subjects.

Most estimates of cost focus only on the tests themselves. The Smarter Balanced Common Core tests require the use of relatively new computers. Existing computers are often inadequate and cannot handle the "computer adaptive tests," or the new Common Core aligned curriculum packages. This was one of the reasons given to justify the expenditure of \$1 billion of construction bonds on iPads and associated Pearson Common Core aligned curriculum software in Los Angeles. The Pioneer Institute pegs the cost of full implementation of the Common Core at \$16 billion nationally - but if others follow the Los Angeles model those costs could go much higher.

The cost in terms of instructional time is even greater, so long as tests remain central to our accountability systems. Common Core comes with a greatly expanded set of tests. In New York City, a typical 5th grade student this year will spend 500 minutes (ten fifty-minute class periods) taking baseline and benchmark tests, plus another 540 minutes on the Common Core tests in the spring. Students at many schools will have to spend an additional 200 minutes on NYC Performance Assessments, being used to evaluate their teachers. Students who are English learners take a four-part ESL test on top of all of the above.

Thus testing under the Common Core in New York will consume at least two weeks worth of instructional time out of the school year. And time not spent taking tests will be dominated by preparing for tests, since everyone's evaluation is based on them.

Error #6: Proficiency rates on the new Common Core tests have been dramatically lower—by design.

Given that we have attached all sorts of consequences to these tests, this could have disastrous consequences for students and teachers. Only 31 percent of students who took Common Core aligned tests in New York last spring were rated proficient. On the English Language Arts test, about 16 percent of African American students were proficient, five percent of students with disabilities, and 3% of English Learners. Last week, the state of North Carolina announced a similar drop in proficiency rates. Thus we have a system that, in the name of "rigor," will deepen the achievement gaps, and condemn more students and schools as failures.

Because of the "rigor," many students—as many as 30 percent—will not get a high school diploma. What will

our society do with the large numbers of students who were unable to meet the Common Core Standards? Will we have a generation of hoboes and unemployables? Many of these young people might find trades and jobs that suit them, but they may never be interviewed due to their lack of a diploma. This repeats and expands on the error made with high school exit exams, which have been found to significantly increase levels of incarceration among the students who do not pass them—while offering no real educational benefits.

It should be noted that the number of students (or schools) that we label as failures is not some scientifically determined quantity. The number is a result of where the all-important "cut score" is placed. If you want more to pass, you can lower that cut score, as was done in Florida in 2012. The process to determine cut scores in New York was likewise highly political, and officials knew before the tests were even given the outcome they wanted.

Error #7: Common Core relies on a narrow conception of the purpose of K-12 education as "career and college readiness."

When one reads the official rationales for the Common Core there is little question about the utilitarian philosophy at work. Our children must be prepared to "compete in the global economy." This runs against the grain of the historic purpose of public education, which was to prepare citizens for our democracy, with the knowledge and skills to live fruitful lives and improve our society.

A group of 130 Catholic scholars recently sent a letter expressing their opposition to the Common Core. They wrote,

The sad facts about Common Core are most visible in its reduction in the study of classic, narrative fiction in favor of "informational texts." This is a dramatic change. It is contrary to tradition and academic studies on reading and human formation. Proponents of Common Core do not disguise their intention to transform "literacy" into a "critical" skill set, at the expense of sustained and heartfelt encounters with great works of literature.

Error #8: The Common Core is associated with an attempt to collect more student and teacher data than ever before.

Parents are rightfully alarmed about the massive collection of their children's private data, made possible by the US department of education's decision in 2011 to loosen the regulations of FERPA . so that student data could be collected by third parties without parental consent.

There are legitimate privacy concerns, for both students and teachers, as data, once collected, can be used for all sorts of purposes. The vision that every student's performance could be tracked from preschool through their working lives may be appealing to a technocrat like Bill Gates, but it is a bit frightening to many parents.

This is one aspect of the project that is already in big trouble. The Gates Foundation invested about \$100 million to create inBloom, a nonprofit organization that would build a system to store the massive amount of student data their reform project requires. However, as parent concerns over privacy have grown, seven of the nine states that had signed up to use the system have withdrawn. Only Illinois and New York remain involved, and in New York this week a lawsuit was filed to block the project.

Error #9: The Common Core is not based on any external evidence, has no research to support it, has never been tested, and worst of all, has no mechanism for correction.

The Memorandum of Understanding signed by state leaders to opt in to the Common Core allows the states to change a scant 15 percent of the standards they use. There is no process available to revise the standards. They

must be adopted as written. As William Mathis (2012) points out,

"As the absence or presence of rigorous or national standards says nothing about equity, educational quality, or the provision of adequate educational services, there is no reason to expect CCSS or any other standards initiative to be an effective educational reform by itself."

Error #10: The biggest problem of American education and American society is the growing number of children living in poverty. As was recently documented by the Southern Education Fund (and reported in the Washington Post) across the American South and West, a majority of our children are now living in poverty.

The Common Core does nothing to address this problem. In fact, it is diverting scarce resources and time into more tests, more technology for the purpose of testing, and into ever more test preparation.

In conclusion: Common standards, if crafted in a democratic process and carefully reviewed by teachers and tested in real classrooms, might well be a good idea. But the Common Core does not meet any of those conditions.

The Common Core has been presented as a paradigmatic shift beyond the test-and-punish policies of NCLB. However, we are seeing the mechanisms for testing, ranking, rewarding and punishing simply refined, and made even more consequential for students, teachers and schools. If we use the critical thinking the Common Core claims to promote, we see this is old wine in a new bottle, and it turned to vinegar long ago.

For all these reasons, I believe any implementation of the Common Core should be halted. The very corporations that are outsourcing good jobs are promoting the Common Core, which deflects attention from their failure to the nation's economy and their failure as good citizens. I do not believe the standards themselves are significantly better than those of most states, and thus they do not offer any real advantages. The process by which they were adopted was undemocratic, and lacking in meaningful input from expert educators. The early results we see from states that are on the leading edge provide evidence of significant damage this project is causing to students already. No Child Left Behind has failed, and we need a genuine shift in our educational paradigm, not the fake-out provided by Common Core.

The frustration evident in recent public hearings in New York is a powerful indicator of a process gone badly awry. The public was not consulted in any meaningful way on decisions to fundamentally alter the substance of teaching and learning in the vast majority of schools in our nation. This process and the content of these standards are deeply flawed, and the means by which student performance is measured continues to damage children.

This did not happen by accident. Powerful people have decided that because they have the money and influence to make things happen, they can do so. But in a democracy, the people ought to have the last word. Decisions such as this ought not be made at secret gatherings of billionaires and their employees. The education of the next generations of Americans is something we all have a stake in.

And so, fellow citizens: Speak Up, Opt Out, Teach On!

What do you think? Is it time to end the reign of Common Core errors?

The answer can only be YES!

Mr & Mrs Paul Thompson

445 Dravo St.

Beaver, Pa 15009

Beaver County

Common Core Standards: Ten Colossal Errors

By Anthony Cody on November 16, 2013 6:18 AM

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Public Law 103-33, General Education Provisions Act, sec 432, reads as follows:

No provision of any applicable program shall be construed to authorize any department, agency, officer, or employee of the United States to exercise any direction, supervision, or control over the curriculum, program of instruction, [or] administration...of any educational institution...or over the selection of library resources, textbooks, or other printed or published instructional materials...

In spite of this prohibition, Race to the Top gave major points to states that adopted "college and career ready standards" such as Common Core.

Here is what the Memorandum of Understanding that state officers were asked to sign said about federal support:

...the federal government can provide key financial support for this effort in developing a common core of state standards and in moving toward common assessments, such as through the Race to the Top Fund authorized in the American Recovery and Reinvestment Act of 2009. Further, the federal government can incentivize this effort through a range of tiered incentives, such as providing states with greater flexibility in the use of existing federal funds, supporting a revised state accountability structure, and offering financial support for states to effectively implement the standards.

When the Department of Education announced Race to the Top there was a complex application process with a short timeline. The Gates Foundation created a process where their staff would assist states in applying for RttT grants. In order to receive this help, state leaders had to fill out a qualifying questionnaire. The first question on the qualifying criteria questionnaire is, "Has your state signed the MOA regarding the Common Core Standards currently being developed by NGA/CCSSO? [Answer must be "yes"]"

Thus, the Gates Foundation worked within the Race to the Top process to apply additional pressure on states to sign on to the Common Core.

Coming at a time when state education budgets were under great pressure, these inducements were significant in overcoming any hesitations on the part of most governors. The pressure continues, as NCLB waivers depend on the adoption of "college and career ready standards," which are most readily provided by the Common Core.

It is also worth noting that alongside the adoption of Common Core standards, both Race to the Top and NCLB waivers being issued by the Department of Education require states to include test scores in the evaluations of teachers and principals. This is a package deal.

Error #2: The Common Core State Standards violate what we know about how children develop and grow.

One of the problems with the blinkered development process described above is that no experts on early childhood were included in the drafting or internal review of the Common Core.

In response to the Common Core, more than 500 experts signed the Joint Statement of Early Childhood Health and Education Professionals on the Common Core Standards Initiative. This statement now seems prophetic in light of what is happening in classrooms. The key concerns they raised were:

1. Such standards will lead to long hours of instruction in literacy and math.
2. They will lead to inappropriate standardized testing
3. Didactic instruction and testing will crowd out other important areas of learning.
4. There is little evidence that such standards for young children lead to later success.

Many states are now developing standards and tests for children in kindergarten, 1st grade, and 2nd grade, to "prepare" them for the Common Core. Early childhood education experts agree that this is developmentally inappropriate. Yo

2976

Donald J. Shaffer
Box 88
Upper Strasburg, Pa. 17265
11/16/13

Mr. David Sumner, Executive Director
I.R.R.C.
333 Maple St., 14th Floor
Harrisburg, Pa. 17101

EMBARCDED MATERIAL

Dear Sir, & Members of I.R.R.C.

Concerning Education & Common Core.

For many years from America's founding to relatively recently the USA had the best educated people in the world and set the standard for others to follow. Our Founding Fathers had the right formula for educating their children to the highest measure, preparing them to lead the Nation in a right and healthy direction based on sound doctrine and truth. Ref. David Barton at Wall Builders.

In the past 50 or so years our children's educational level has dwindled to the point where the USA is one of the lowest educated nations among all the industrialized countries. Look at the devastating results in the conditions we face today.

Examining data on "Common Core" it appears to be another program that lowers the bar, further reducing the real educational level of our children.

Our students are the future leaders of the USA and maybe the world, why enslave them to a system "Common Core" that removes local control by parents, administrators, & teachers, and impedes students' ability to do their best? Please, set "Common Core" and all such systems like it aside.

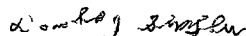
Raise the educational bar for all students (K - 12), return to our Founding Fathers instructions for training our children using all the new, well documented data available today, and prepare them to take the reins of leadership in whatever career they freely choose to follow.

Take the lead, teach youth accurate American History showing the high price in lives, blood, & fortunes that have been given for the "precious freedom" we enjoy today, instruct them with the best material in each subject based on truth, challenge every student to be responsible for doing their best, and show them you really care.

Future generations will look back on the decisions that are made today. Let us stand with our Founding Fathers by taking the courage to do what is right, standing firm on the principles that made America great. We can be the heros of the day!

Thank you for your time on this matter.

Sincerely yours,

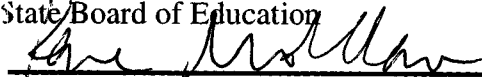


Donald J. Shaffer

© 2013

Regulation #6-326 (IRRC #2976)
State Board of Education
Academic Standards and Assessment

Larry Wittig, Chairman
State Board of Education

A handwritten signature in black ink, appearing to read "Larry Wittig", written over a horizontal line.

Date: 11/20/13

TRANSACTION REPORT

P. 01

NOV-20-2013 WED 03:56 PM

FOR:

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
NOV-20	03:53 PM	97051854	2' 39"	16	FAX TX	OK	100	
			TOTAL :	2M 39S	PAGES:	16		

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Paul Clymer, Chairman
 Agency: House Education Committee
 Phone 783-3154
 Fax: 705-1854
 Date: 11/20/13
 # of Pages: 18

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. Please distribute this material to the appropriate regulatory staff as soon as possible.

TRANSACTION REPORT

P. 01

NOV-20-2013 WED 03:58 PM

FOR:

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
NOV-20	03:56 PM	97831665	2' 03"	16	FAX TX	OK	101	
TOTAL :						2M 3S	PAGES: 16	

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable James Roebuck, Minority Chairman
 Agency: House Education Committee
 Phone: 783-1000
 Fax: 783-1665
 Date: 11/20/13
 # of Pages: 16

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

TRANSACTION REPORT

P. 01

NOV-20-2013 WED 04:07 PM

FOR:

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
NOV-20	04:02 PM	97873455	4' 56"	16	FAX TX	OK	102	
TOTAL :						4M 56S	PAGES:	16

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Mike Folmer, Chairman
 Agency: Senate Education Committee
 Phone: 787-5708
 Fax: 787-3455
 Date: 11/20/13
 # of Pages: 16

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

TRANSACTION REPORT

P. 01

NOV-20-2013 WED 04:09 PM

FOR:

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
NOV-20	04:08 PM	97874384	1' 33"	16	FAX TX	OK	103	

TOTAL : 1M 33S PAGES: 16

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Andrew E. Dinniman, Minority Chairman
 Agency: Senate Education Committee
 Phone 787-5709
 Fax: 787-4384
 Date: 11/20/13
 # of Pages: 16

RE: State Board of Education #6-326 (IRRC #2976) – Academic Standards and Assessments

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

EMBARGOED MATERIAL

Cooper, Kathy

From: Denise Miller <honeymiller92@gmail.com>
Sent: Wednesday, November 20, 2013 3:05 PM
To: David Sumner
Subject: Keystone Exams

I realize this email will be received after the 11/19 deadline, but I only just got word of this critical issue. Therefore, I find it necessary to express how I strongly disapprove of passing this law in accordance with all 8 cited reasons for not adopting this policy, in addition to my own personal experiences with my high school children who receive excellent grades but have struggled tremendously with passing the Keystone Exams.

Say No!
Sincerely,

Denise Miller
Proud Parent of 2 Garnet Valley High School Students
(484) 880-1143

NOV 20 2013
11:05 AM
GARNET VALLEY

2976

EMBARGOED MATERIAL

NO COMMON CORE IN PENNSYLVANIA NOR ANYWHERE IN AMERICA

Here we are, the HISTORICAL STATE OF Pa. and IRRC#2976 needs discussed in detail as though it has any importance of value?

To our various departments throughout the state and many of those on my email lists.

COMMON CORE IS BEING REVIEWED AGAIN IN PA. WHY? ONCE WAS ENOUGH!

Though I understand the many issues to look at in regards to funding, implementation costs and fiscal consequences, that is not the real problems why we should not have COMMON CORE here nor anywhere.

I have written letters before inviting to allow me to talk im person or openly about exact details and circumstances of the results of Arne Duncan's way of ruining good education. I invited you to take the PSSA tests so you would understand what is really going on. Apparently, you don't want to know, or you don't want the conversation because you do know and agree with it.

Anyone, go to the search engine and read about Arne Duncan's views, how he wants kids in school at an earlier age, wants to keep them in school more years, wants to keep them in school more hours per day. Why? I have the video if you want to view it on Indoctrination. The kids are already being taught math wrong and cannot timely be able to pass entrance exams with the time given to test. Common Core is bad, with very cruel and evil intent.

45 states have whored out to money and personal agenda and sold out the proper well being of students instead of having the courage to protect them. So far Pa. has shamefully gone along with others.

WHAT KIND OF PEOPLE ARE FOR COMMON CORE? THAT IS THE MAIN REASONS TO OPPOSE IT AND NOT HAVE ANYTHING TO DO WITH IT AND TO TELL WASHINGTON WE ARE THE PROUD STATE OF PA. AND WE WILL EDUCATE OUR STUDENTS PROPERLY.

WHO WANTS IT? WHO IS FOR IT? Mr. Governor, our school system, our politicians; WHY?

Obama, Arne Duncan, liberals, socialists, communists, the many people Obama made sure to have in positions, teacher unions, gays, anti Chritians, anti Americans, those that wants a one world government, those that wants a dictatorship, those that wants government run health insurance, those that wants to keep turning over our decisions to the U.N.. People that wants to transform America and CONTINUE to brainwash the students to do it and carry it on.

When these types of people are for it, THIS IS THE REASONS TO BE AGAINST IT.

A school district has a billboard up, HERE. Do you want pictures of it? It is Common Core evident of what the majority of school districts are all about already in this state and it will get worse for our students if it is not stopped and if our politicians and education system does not stop the corruption now; "PROVIDING A PROGRESSIVE EDUCATION TO STRENGTHEN THE GLOBAL COMMUNITY". What does that sound like; Washington's playbook?

Dwight Blake
69 Griffith Road Delta, Pa. 17314

2:23

Cooper, Kathy

From: Marc A. Gallo <marc@wemindthegap.com>
Sent: Tuesday, November 19, 2013 5:37 PM
To: David Sumner
Subject: Oppose Chapter 4 Revisions

Dear Executive Director Sumner:

I am writing as a concerned resident in the Upper Darby School District to share my discontent with the recent approval of revisions to Chapter 4 (Academic Standards and Assessments) by the State Board of Education. Specifically, I wish to express my opposition to the Keystone Exam graduation requirement.

For students who are already being measured by other meaningful, objective measures such as the PSAT, SAT, ACT and AP exams, the Keystone Exams offer no additional benefit. For taxpayers, the costs of these tests and any required remedial activities far exceed any value to our district.

All of the student groups in the Upper Darby School District meet or exceed the state's graduation requirements. Upper Darby School District is obviously offering a rigorous curriculum. Guided by "local control", Upper Darby School District retains the ability to choose curriculum instruction and assessment tools that benefit all of our students and meet our community's high standards.

I join with the Upper Darby School District School Board in opposing the Chapter 4 revisions and ask that the Keystone Exam graduation requirement be rescinded. A few specific concerns include:

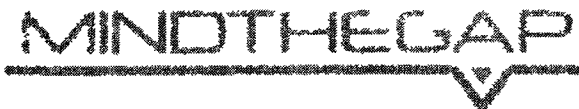
- State-mandated end-of-course exams effectively remove local control from the school district.
- The associated requirements for remediation will be costly, but no additional funding is being provided by the state to meet the mandate.
- The move to online testing will require our district to make investments in technology and cabling that would be better spent on direct instruction.
- All students enrolled in special education must take the test, which may violate their right to access a free and appropriate public education.

As a concerned citizen I respectfully ask that you remove language requiring the unfunded mandate of passing Keystone graduation exams from the Chapter 4 revisions.

Minding the gap,

Marc A. Gallo, President
1124 Blythe Ave
Drexel Hill, PA 19026

Mind The Gap
888-353-6745



Site: www.wemindthegap.com
Blog: <http://www.wemindthegap.com/blog/>

9/19/13 10:53 AM
11/19/13 5:37 PM
11/19/13 5:37 PM

Twitter: @mindthegap

Facebook: <http://www.facebook.com/MindTheGap>

LinkedIn: www.linkedin.com/in/mindthegap

Come join us @ Mind The Gap

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EMBARGOED MATERIAL

Cooper, Kathy

From: Dante <dantemucci@yahoo.com>
Sent: Tuesday, November 19, 2013 1:17 PM
To: David Sumner
Subject: Opposed to Over-Testing and Under-Educating

I am writing you to express my intense opposition to the Keystone Exams in general, and the Graduation Exam in particular. Our tax dollars should be spent PROVIDING EDUCATION and not squandered and the over-analysis of test scores. I need my tax dollars to be used for upgrading facilities, reducing class sizes, and expanding the scope of programs offered. NOT to make some test-producing company RICH! Testing is necessary, unfortunately the pendulum has swung much too far towards analysis and away from providing an enriching program of study for students to expand their knowledge and creativity, as well as over-burdening educators with doing more while being provided less. It's ludicrous that our governor cuts funding for schools, yet puts such a priority on testing students. Repeat after me... "setting public schools up for failure." Can't wait to vote next November.

Regards,

Mr. Dante Mucci

Sent from my iPhone

11/19/13 1:17 PM
Dante Mucci

Cooper, Kathy

From: O'Neil, Julianne <julianne.oneil@siemens.com>
Sent: Tuesday, November 19, 2013 5:35 PM
To: David Sumner
Cc: juloneil@gmail.com
Subject: Negative Reaction to Keystone Graduation Exams

Mr. Sumner,

As an education professional, test writer and taxpayer in Pennsylvania, I am concerned about the rationale, benefit and cost of the Keystone Graduation Exams that have been proposed for a vote this week.

I object to these exams for three reasons:

- No significant additional benefit to the administration and cost of such exams that are not already addressed by existing test methods in the districts (PSSA, AYP and other standardized tests),
- No proposed (known) remediation benefit to be provided by the Commonwealth to school districts in Pennsylvania to support students in the event of failure,
- Not worth the loss of valuable time that could be better spent actually educating students in academic areas, rather than preparing them for and administering these tests.

For these reasons, I ask you and the IRRC to please vote AGAINST the institution of these tests in Pennsylvania schools.

Julianne E. O'Neil, MS, MEd
Education Services
SIEMENS – Health Services
Siemens Healthcare

Siemens Medical Solutions USA, Inc.
H CX HS ES EDS EE
51 Valley Stream Parkway, Mail Code R01
Malvern, PA 19355-1406 USA
Tel: +1 610-219-8285
Fax: +1 610 219-4293
<mailto:julianne.oneil@siemens.com>
www.usa.siemens.com/healthcare

6/10/13 5:35 PM
C:\Users\joneil\Documents\...

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This message and any attachments are solely for the use of intended recipients. The information contained herein may include trade secrets, protected health or personal information, privileged or otherwise confidential information. Unauthorized review, forwarding, printing, copying, distributing, or using such information is strictly prohibited and may be unlawful. If you are not an intended recipient, you are hereby notified that you received this email in error, and that any review, dissemination, distribution or copying of this email and any attachment is strictly prohibited. If you have received this email in error, please contact the sender and delete the message and any attachment from your system. Thank you for your cooperation.

Cooper, Kathy

From: Laurie <lap346@verizon.net>
Sent: Tuesday, November 19, 2013 8:51 PM
To: David Sumner
Subject: Concern about Keystone Exams

Dear Executive Director Sumner:

I am writing as a concerned resident in the Upper Darby School District to share my discontent with the recent approval of revisions to Chapter 4 (Academic Standards and Assessments) by the State Board of Education. Specifically, I wish to express my opposition to the Keystone Exam graduation requirement.

For students who are already being measured by other meaningful, objective measures such as the PSAT, SAT, ACT and AP exams, the Keystone Exams offer no additional benefit. For taxpayers, the costs of these tests and any required remedial activities far exceed any value to our district.

All of the student groups in the Upper Darby School District meet or exceed the state's graduation requirements. Upper Darby School District is obviously offering a rigorous curriculum. Guided by "local control", Upper Darby School District retains the ability to choose curriculum instruction and assessment tools that benefit all of our students and meet our community's high standards.

I join with the Upper Darby School District School Board in opposing the Chapter 4 revisions and ask that the Keystone Exam graduation requirement be rescinded. A few specific concerns include:

- State-mandated end of-course exams effectively remove local control from the school district.
- The associated requirements for remediation will be costly, but no additional funding is being provided by the state to meet the mandate.
- The move to online testing will require our district to make investments in technology and cabling that would be better spent on direct instruction.
- All students enrolled in special education must take the test, which may violate their right to access a free and appropriate public education.

As a concerned citizen I respectfully ask that you remove language requiring the unfunded mandate of passing Keystone graduation exams from the Chapter 4 revisions.

Sincerely,

Laurie Patterson
717 Concord Ave
Drexel Hill, PA 19026

Cooper, Kathy

From: k.george@verizon.net
Sent: Tuesday, November 19, 2013 1:46 PM
To: David Sumner
Subject: Keystone Graduation Exams

Dear Mr. Sumner:

My husband and I implore you to please vote AGAINST the Keystone Graduation Exams! They appear to be costly, unwarranted, a waste of teacher and student time, and do not provide anything of real value in return for the student, teacher, parents or taxpayers.

Thank you for your attention in this regard,

Respectfully,

Dr. Gary W. Nelb
Mrs. Karen Wolf George Nelb
215 Westerly Way
West Chester, PA 19382

11/19/13 1:46 PM
k.george@verizon.net
David Sumner

Cooper, Kathy

From: Abeloff Elisa <ea@newsengin.com>
Sent: Tuesday, November 19, 2013 9:03 PM
To: David Sumner
Subject: Chapter 4 Regulations

Dear Mr. Sumner:

I'm writing regarding the proposed regulations pending before Pennsylvania's Independent Regulatory Review Commission (IRRC). The Chapter 4 Regulations address the impact and implementation of the Keystone Exams. I am opposed to the regulations and urge the IRRC and General Assembly not to require Keystone exams as graduation requirements.

Thanks for your consideration.

Elisa Abeloff

--
Elisa Abeloff
ea@newsengin.com
610-574-7858

2
1
2
2

EMBARGOED MATERIAL

Cooper, Kathy

From: Kimberly Griego-Boruch <kgbb120@gmail.com>
Sent: Tuesday, November 19, 2013 4:48 PM
To: David Sumner
Subject: Keystone Graduation Exams

Dear Director Sumner,

As a teacher with 20 years of experience in the Commonwealth, I implore you to and the members of the IRRC to reject the Keystone Graduation Exams that will discussed at your meeting on Thursday. I have not seen any benefits of these exams for the students in my school district. Quite to the contrary, I have seen excellent students who test poorly become frustrated and disillusioned. Schools lose valuable instructional time and parents are left to deal with stressed out students who know only what they need to in order to pass the test of the moment. This is not what education is about. I do not believe that this is what parents expect from schools. I did not become an educator to teach to a test. Please consider fully all of the consequences that these exams have for everyone in the Commonwealth as you make your decision.

Thank you for your time,

Kimberly Griego-Boruch
Kennett Square, PA

--

When the power of love overcomes the love of power the world will know peace.

Jimi Hendrix

6:16
11/19/13
11:16 AM
11/19/13

Cooper, Kathy

From: Jennifer Milani <milanijen@gmail.com>
Sent: Wednesday, November 20, 2013 8:41 AM
To: David Sumner; dleach@pasenate.com; repmaryjodaley@pahouse.net; mfolmer@pasen.gov; BONEill@pahousegop.com
Subject: keystone exams

I write today to urge you to vote no on Chapter 4 Regulations. Here in Lower Merion where we live my children enjoy (maybe not enjoy!) a rigorous, challenging curriculum. As middle school and high school students they are tested often. In addition to all of the standardized tests they take chapter tests, quarterlies, midterms and final exams. There is simply no need for an additional final exam - one that forces the teachers to teach to the test. When that's the overriding factor we lose out on student driven learning, on taking the time to go deeper, on being flexible as topics and current events change. Nevermind that it's simply a waste of time and money administering another exam.

I understand that it is estimated that Pennsylvania will spend in the neighborhood of \$300 million annually on the implementation of Keystone exams. How can anyone, in good conscience, vote to spend that money when the Philadelphia Public School system is running a bare bones operation. Please use those funds to hire teachers, train teachers to be better educators, provide additional services. But I beg you - don't throw that money away which is what you'll be doing if it goes to additional testing.

Please vote no on Chapter 4 regulations. It's the right thing to do - for the children.

Thank you.

Sincerely,

Jennifer and Chris Milani
429 Old Gulph Rd
Penn Valley, PA 19072

6230 11 20 13
C. J. M.

UNRECORDED MATERIAL

Cooper, Kathy

From: Bethdowdall <bethdowdall@verizon.net>
Sent: Wednesday, November 20, 2013 11:35 AM
To: David Sumner; dleach@pasenate.com; repmaryjodaley@pahouse.net;
mfolmer@pasen.gov; BONEill@pahousegop.com
Subject: Chapter 4 Regulations.

To whom it may concern,

I am completely against this, In addition to the absurdity of teaching to the test (and effectively dumbing down our curriculum) and adding more standardized tests the financial piece is compelling. It's estimated it will cost \$300 million annually to implement the keystone exams. Would much rather see that money go into hiring teachers, teacher training and supports for students - especially in our struggling districts. It's criminal to funnel that money to testing companies. Our children have enough stress at school what happened to being children

Please vote no

Sent from my iPad, please excuse the Apple translation of my words

6:33
11/20/13

Cooper, Kathy

From: Paul Stavros <paulstavros@verizon.net>
Sent: Wednesday, November 20, 2013 9:08 AM
To: David Sumner
Subject: Keystone Graduation exams

Dear Sir,

After reading Senator Dinniman's concerns regarding the Keystone Graduation Exams, I believe too many questions regarding their effectiveness and cost remain unanswered and as such I am opposed to their approval. I would gladly reconsider them once Senator Dinniman's concerns and request for information have been addressed. Thank you for listening.

Paul Stavros
108 Biddle Dr.
Exton, PA 19341-1739
610-363-7896

610 363 7896
108 Biddle Dr.
Exton, PA 19341-1739

Cooper, Kathy

EMBA

From: Michael Simon <mssimon67@gmail.com>
Sent: Wednesday, November 20, 2013 11:14 AM
To: repbriggs@pahouse.net; mfolmer@pasen.gov; repdelissio@pahouse.net;
BONeill@pahousegop.com; dleach@pasenate.com; David Sumner;
reprimaryjodaley@pahouse.net
Subject: Chapter 4 Regulations

I am writing to ask that you vote no on Chapter 4 Regulations. I am a taxpayer in Montgomery County, PA, and the proud parent of two children (10th grade and 5th grade) in the Lower Merion School District. We are firmly against 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. 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 Philadelphia.

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

Too much time and money is already spent on standardized testing in our public schools. We want our children to enjoy school, have an inherent sense of curiosity and a love of learning. We do not want our children to spend their days preparing for state mandated exams.

We 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,
Michael Simon
Parent of Two Children in Lower Merion School District
Montgomery County, PA

67:56 . . . 2:19

Cooper, Kathy

From: dbrown@americaspublicschools.com
Sent: Wednesday, November 20, 2013 1:18 AM
To: David Sumner
Subject: fw: Vote "no" for a Research-based Policy Instead
Attachments: STATE GRADUATION REPORT.doc; PONZI SCHEME by DAVE F. BROWN.docx

Director David Sumner,

Please read the attached document regarding a summary of research on the negative effects of high stages graduation tests in several states, and a short letter-to-the-editor I wrote a few months ago.

I am an educational researcher who has studied the effects of state mandated testing for over 25 years.

As a parent of a current 16 year-old in a Pennsylvania high school, I have opted my daughter out of the Keystone Examinations based on the state regulations permitting parents to do so. As a researcher and a life-long educator, I know that these tests are feckless and provide no new information to teachers or students. Why would you or your colleagues approve such a test when the data clearly discount the value of such?

I look forward to hearing of your decision that cancels this mandate and in the process provides an opportunity for professional educators to take back control of their profession, versus handing it over to Pearson and the other testing companies. Believe me, preparing adolescents and children for these tests is not the kind of learning you and I were so fortunate to receive from our teachers who were unfettered by these absurd testing mandates. Let's provide our children and grandchildren with the same professionally based opportunities to learn as you and I received. We arrived at our professional positions without these examinations; so what would make us believe that our children need to be subjected to them?

Please vote "NO" on approving these feckless tests!

Dr. Dave F. Brown
Educational Researcher
Author of *Why America's Public Schools Are the Best Place for Kids: Reality vs. Negative Perceptions* (2012)

Note: Attached Document is already in Embargoed Material previously submitted earlier on 11/20/13.