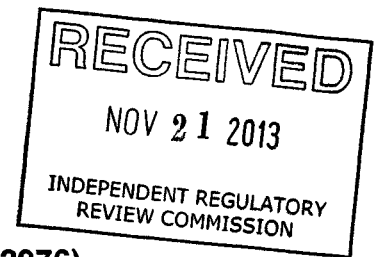


*November 21, 2013 IRRC Public
Meeting Testimony*

**Independent Regulatory Review Commission
November 21, 2013**



**Consideration of final-form regulation #6-326 (IRRC #2976)
Chapter 4 (Academic Standards and Assessment)**

Good morning Chairman Lutkewitte and fellow Commissioners. My name is Lee Williams, and I serve as Chair of the State Board of Education's Committee on Academic Standards and Chapter 4. I'm pleased to be with you this morning to discuss the final-form revisions to Chapter 4 that have been the subject of much debate and deliberation.

I'd like to begin by providing a sense of history related to the key issues addressed in this regulatory package, and then will discuss the process undertaken by the Board that has led us here today.

In 2006, concerns were brought to the Board's attention that many students were graduating from high school without adequate preparation for entering the workforce or college. This was evidenced by data that showed more than 40% of Pennsylvania's high school graduates – representing more than 50,000 students each year – were being awarded diplomas without demonstrating proficiency on the state's reading, writing and math tests. Additional data showed that fewer than half of our high school graduates enrolled in college upon graduation, only 37% persisted to their sophomore year, and just one-third graduated from college on time. Further, a February 2009 survey of our state's 14 community colleges and 14 state-owned universities found that 62,000 students at the schools were enrolled in remedial coursework at a cost exceeding \$26 million annually.

This startling data led the Board to engage stakeholders in conversation about high school reform efforts that would restore value to diplomas issued in the Commonwealth. That conversation culminated in changes to Chapter 4 that took effect in 2010. The revisions to Chapter 4 adopted at that time established a series of end-of-course Keystone Exams in 10 content areas, and required Keystones to count as at least one-third of a student's final course grade. The reforms adopted by the Board in 2010 also established alternate paths to proficiency through a local assessment option and project-based assessments; put in law a requirement that students who were not proficient be offered supplemental instruction; and created supports for school districts through voluntary model curriculum and diagnostic assessments.

Let me be clear – provisions establishing Keystone Exams, establishing requirements for supplemental instruction, and establishing requirements for alternate project-based assessments were reviewed by the Independent Regulatory Review Commission and the House and Senate Education Committees prior to their enactment in 2010, and do not represent new requirements of the rulemaking currently before you.

The formative steps for the current revisions to Chapter 4 moved on two tracks. First, the Board's Committee on Chapter 4 oversaw the review of amendments to the procedures and requirements in the Chapter related to Keystone Exams. This work included multiple opportunities for public input.

In winter 2012, the Committee held public hearings to solicit input on draft revisions relating to Keystone Exams. Hearings were held at the Montgomery County Intermediate Unit and Department of Education in Harrisburg. A third hearing was scheduled to be held in Pittsburgh, however, that event was cancelled because no one registered to provide comment to the Committee. In advance of the hearings, draft revisions to Chapter 4 were posted on the Board's website for public review.

In addition to providing an opportunity to testify before the Committee, the Board also invited individuals to submit written testimony. Comments received during this initial drafting process resulted in changes being made to the proposal before it was adopted by the Board as a proposed rulemaking.

Subsequent to its adoption of a proposed rulemaking, the Board invited public comment on the regulation and received written comments from 146 individuals and organizations during the 30-day comment period. These comments were taken into consideration and, again, resulted in changes being made to the proposal before the Board adopted a final rulemaking.

The second formative track for the current regulatory changes addressed the state's academic standards in English and math. Further study by the Pennsylvania Department of Education concluded that Pennsylvania students would be better served by creating a unique set of state-specific standards in English Language Arts and Mathematics guided by the Common Core and the needs of the Commonwealth.

Before I discuss the process the Board undertook related to the second formative track, I'd like to give you a sense of perspective related to the Board's lengthy deliberations on state academic standards.

State academic standards in Math and English were established in 1999. At that same time, the Board made a commitment to conduct periodic reviews of its academic standards to determine if the standards remained appropriate, clear, specific and challenging. Standards in 12 different content areas were developed between 1999 and 2006 and, upon completion of the last set of standards, the Board announced its intention to conduct a periodic review of the first two sets of standards adopted – Math and English.

This standards' review commenced in 2007 and marked the first review of the state's Math and English standards in almost a decade. The Board engaged teams of Pennsylvania educators to consolidate, clarify and update the standards. Public hearings on the draft revised standards were announced in July 2008, and the draft revisions were posted for public review on the Board's website. Following this opportunity for public comment, in September 2008, the Board approved revisions to

the state's Math and English standards as a proposed regulation and prepared the standards to undergo regulatory review.

As the Board was preparing to submit its revised academic standards for additional public review, the creation of a collaborative set of academic standards in English and Math – later known as the Common Core State Standards – emerged as a policy goal of the National Governors' Association, the Council of Chief State School Officers and more than 45 states and territories. In September 2009, the Board elected to withdraw its independent standards revisions to explore whether Common Core was a sound alternative.

To make an informed decision, the Board engaged the University of Pittsburgh to conduct a standards alignment study. The Pitt study found that Common Core was highly correlated with the independent Math and English standards revisions the Board had begun pursuing back in 2007.

Given the high degree of alignment, in 2010, the Board advanced a revision to Chapter 4 to adopt the Common Core Standards as the state's academic standards in English and Math and to provide schools with a three-year phase-in period for the new standards. Four public meetings were held across the state to present the Pitt alignment study and gather public feedback. The Board also appeared before the Senate Education Committee to discuss the standards and posted copies of the standards on its website for public review and comment. The standards ultimately were reviewed and approved by the Independent Regulatory Review Commission in August of 2010.

Following their adoption, the Board continued to engage stakeholders by hosting four roundtables to solicit input on implementation of the new standards. As we continued to work through implementation of these first-ever revisions to state academic standards, further study by the Pennsylvania Department of Education concluded that Pennsylvania students would be better served by creating a unique set of state-specific standards in English Language Arts and Mathematics guided by the Common Core and the needs of the Commonwealth.

The Department convened teams of Pennsylvania educators to personalize the standards to meet the needs of the Commonwealth, and made a public presentation of draft revisions to the standards in March of 2012. The standards revisions were incorporated into broader revisions to Chapter 4 approved by the Board as a proposed regulation in May of 2012, and then offered for public comment.

Final-form revisions to Chapter 4 addressing three key areas – strategic planning, high school graduation requirements, and academic standards – were approved by the State Board in March of 2013 and transmitted to the Governor's Office for review. Due to the amount of misinformation and concerns raised by the public, Governor Corbett asked the State Board to review the regulations to ensure they were in the best interest of Pennsylvania students. The Pennsylvania House of Representatives also adopted House Resolution 338, which asked the Board to

consider whether revisions to Chapter 4 were necessary to address the concerns being expressed.

In June of 2013, the Board withdrew its final Chapter 4 regulation to discuss the concerns expressed in House Resolution 338. Extensive opportunities for public comment were offered at the Board's public meetings in both July and September, and the Board appeared at three hearings before the House and Senate Education Committees to further discuss issues related to Chapter 4.

As a result of this additional time for public debate, in September 2013, the Board adopted additional changes to Chapter 4 to address concerns related to local control, national assessments and data collection. These changes make it clear that the state's academic standards do not apply to private, religious or home education students; preclude the Department from mandating a statewide curriculum or statewide reading lists; preclude the Department from using national assessments for students without IEPs; and preclude the Department from expanding its collection of student or personal family data due to the Pennsylvania Core Standards. Additional revisions were made to place decisions about graduation waivers with local school administrators and to remove information on student transcripts related to project-based assessments that raised objections from a state lawmaker.

Throughout our many months of deliberation, the Board has placed considerable emphasis on stakeholder involvement, and created opportunities for the public to engage with the Board both in writing and in person.

The Board also has been responsive to this public engagement by making changes to our rulemaking at every stage in the process – beginning with changes to our initial draft prior to adopting a proposed regulation; changes to our proposed regulation prior to adopting a final regulation; and then withdrawing our final regulation to make yet additional changes in response to public concerns.

I appreciate your attention this morning as I reviewed the process the Board has undertaken in preparing the final rulemaking that is before you this morning. I will now turn to Acting Secretary of Education Carolyn Dumaresq who will provide more detail on the policy changes advanced in the final regulation.



pennsylvania
DEPARTMENT OF EDUCATION

Testimony
Independent Regulatory Review Commission

Chapter 4
Carolyn Dumaresq, Ed.D.
Acting Secretary of Education
11/21/2013

Good afternoon. Thank you Chairman Lutkewitte and members of the Commission for the opportunity to comment on regulatory package 6-326, Academic Standards and Assessment, which amends Chapter 4 of Title 22.

I'd like to begin by explaining why this regulation is so important and what implementation of this regulation will mean for Pennsylvania's children. It is imperative that Pennsylvania's public education system provide our students with the very best education so that they can compete for postsecondary opportunities, including employment in Pennsylvania and in the global marketplace. Times have changed significantly since many of us attended school and even from when I was in the classroom. The world is a very different place then it was 10, 20 or 30 years ago. It is technology driven. It is global. Most significantly, more is expected of our students when they graduate from high school. Whether they enter the workforce directly after graduation, or they pursue some type of postsecondary education and training before entering the workplace, our students need the 21st century skills to help them succeed. Thankfully, many of our schools and educators have already taken action to adapt to emerging educational trends to ensure that their students excel.

The regulatory package before you represents part of this change. The concept behind these regulations is not new. In fact, Pennsylvania has had academic standards in place since the 1990s. And states all across the country have administered end of course exams for decades to ensure that their students have mastered the course content. This regulation allows Pennsylvania to catch up. Recently a mother noted that she hoped that when her son finished his Algebra I course, he can pass a test to demonstrate that he actually learned Algebra. This is a reasonable request that makes sense. This regulatory package provides support for our educational system to help our students become successful.

This regulation includes, among others, provisions related to academic standards and assessments. Specifically, the regulation establishes a set of rigorous academic standards in English Language Arts and Mathematics that all Pennsylvania students will be expected to learn to ensure that they are prepared for postsecondary success, commonly referred to as the Pennsylvania Core Standards. Mastery of these standards is important whether a student plans to attend an institution of higher education, pursue career and technical training, join the military, or enter employment directly from high school.

The regulation also refines and implements a series of Keystone Exams, which Pennsylvania students will be required to pass in order to graduate from high school beginning with the class of 2017.

This regulation represents the culmination of several years of work by the State Board of Education, the Pennsylvania Department of Education, Pennsylvania teachers and school administrators, members of the General Assembly and the general public. Several public hearings were held in Harrisburg and across the state and significant work was done to ensure Pennsylvania policy-makers were creating the best standards for Pennsylvania students. Because of the inclusive and collaborative nature of the development of these standards, many Pennsylvania school districts, educators, institutions of higher education, businesses, student advocacy organizations and other groups strongly support this regulation.

As a parent, former teacher, principal and superintendent, I also support this regulation and applaud the school districts across the Commonwealth that have already aligned their local curriculum with these standards. I appreciate the work that these school boards, educational leaders and classroom teachers have begun to ensure that their students graduate from high school prepared to succeed in the workplace or in postsecondary education and training programs.

I am concerned however, about the proliferation of misinformation that has been circulated about this regulation. I'd like to take just a few moments to clarify several issues for the Commissioners.

- The adoption of this regulatory package maintains Pennsylvania's longstanding tradition of local school district authority over curriculum and content in classrooms. While the regulation does establish standards, it does not give the federal or state government control over local curriculum, does not mandate any particular curriculum, does not mandate specific texts and does not mandate schools to use specific reading lists. Please see Section 4.4(F) of the regulation which specifically prohibits PDE or the State Board from requiring school entities to utilize a statewide curriculum or statewide reading lists.

- The adoption of this regulation is in compliance with federal and state statutes designed to protect the integrity and privacy of student data and information. The regulation will not result in increased data collection associated with student or parent personal information. Please see Section 4.12 (J) of the regulation which includes language that specifically prohibits PDE from expanding student data collection or collecting personal family data in association with implementation of this regulation.

- This regulation is estimated to result in cost savings, not a cost increase to districts. Under existing regulations, a series of 10 Keystone Exams would be administered to students, districts would have to provide supplemental instruction in 10 content areas, and/or administer project-based assessments, and students would be required to complete a culminating project. The regulation reduces the number of Keystone Exams from 10 to 5, reduces the amount of supplemental instruction required, and eliminates the requirement to complete a culminating graduation project, which will significantly reduce costs to the Commonwealth and to districts.

Without approval of this regulation, the Commonwealth would revert to the regulations adopted in 2010, which took effect on July 1, 2013. Specifically, the following would apply:

- The adoption of the national Common Core State Standards would remain in place.
- PDE would be required to develop and implement Keystone Exams in 10 subject areas.
- Students would be required to demonstrate proficiency on six of the 10 Keystone Exams in order to graduate.
- Student performance on the Keystone Exams would be calculated as at least one-third of his/her course grade. This would need to occur retroactively for those students who

already took the Keystone Exams beginning with the class of 2015, and transcripts would need to be revised to reflect the recalculated grade.

- Student transcripts would be required to include the score attained on the Keystone Exams.

- Each student would be required to complete a culminating graduation project.

- PDE would have to realign the PSSAs and Keystone Exams to the national Common Core State Standards, which would result in significant costs, or would require the department to use national Common Core exams to assess students.

I believe that disapproval of this regulation would result in significant disruption and increased costs to Pennsylvania's education system. The appropriate action would be to move forward with approval and implementation of this regulation, which is why I respectfully request the Commission approve regulation 6-326. Thank you.

TESTIMONY
INDEPENDENT REGULATORY REVIEW COMMISSION

Chapter 4

Good (morning/afternoon) Commissioners. I appreciate this opportunity to address the Independent Regulatory Review Commission today. My name is Larry Wittig and I am the Chairman of the State Board of Education for the Commonwealth of Pennsylvania. I also serve on the Tamaqua Area School District's school board and have been the President for the past 18 years. It is in this capacity that I will testify in favor of the Chapter 4 revisions and the Keystone Exams.

In my income producing life I am a CPA in public practice. I take my fiduciary responsibility to the taxpayers of the Tamaqua School District very seriously. My number one priority in all my public service is to have the students of Tamaqua graduate with the tools to be successful in life no matter what they choose to do. Tamaqua ranks 459th of 500 school districts in the Commonwealth in terms of dollars spent per student. We rank 3rd in our geographic area compared with 15 other districts in PSSA performance. The district has an enrolment of approximately 2200 students and falls right in the middle demographic of the commonwealth's 500 districts. Tamaqua is not a wealthy district. I state this only to give you a sense of my background thereby adding credibility to my testimony.

When the State Board was working on the revision which are before you today, I, as a school board member, wanted to know just how this would impact my district, both from a financial and a logistical perspective. I asked our business manager to give me a figure of what if any added costs would be incurred as a result of these proposed changes. She got back to me and said it would be a cost of around \$31,000. I accepted this amount and used it in testimony which I made in the senate hearing in Chester Co. When I returned from that hearing I sat down with our manager and investigated the numbers myself to see what was included in this cost. As it turns out the \$31,000 number was a result of earmarking \$31,000 of our professional development budget to just the revisions to Chap 4 and the Keystone Exams. There was not an increase in our entire budget just a reallocation. We invested in Skill program "Study Island and other programs like" Read 180" that amounted to about \$20,000. These investments would have been made in any event as a matter of curriculum development. Tamaqua's budget is about \$27 million. The money spent to insure our students will be competitive post graduation is an ongoing process and does not increase or decrease with a subtle change in direction.

The rather large numbers that were discussed by some individuals and organizations were not representative of what the actual ADDED costs are. The Tamaqua School district does not believe in social promotion but does believe that a student is entitled to a guaranteed standard of education. Unfortunately not every district has this philosophy and therefore it is the State's responsibility to ensure that happens. I believe with the implementation of Keystone exams as a graduation requirement, the State in fact does fulfill its pledge to the students of Pennsylvania of a guaranteed standard of education.

At Tamaqua's last school board meeting I mentioned that there was a possibility that the revisions, that Tamaqua and almost every other district in PA were working on, might not be approved by IRRC. The collective gasp in the room was deafening. As a PSBA member, State Board of Education member, a local school board member, a parent and a business man, I urge the approval of the revisions of Chapter 4 as they are presented. Thank You

Larry Wittig, President Tamaqua Area School District
Chairman State Board of Education

Comments of the Independent Regulatory Review Commission



State Board of Education Regulation #6-326 (IRRC #2976)

Academic Standards and Assessment

December 5, 2012

We submit for your consideration the following comments on the proposed rulemaking published in the October 6, 2012 *Pennsylvania Bulletin*. Our comments are based on criteria in Section 5.2 of the Regulatory Review Act (RRA) (71 P.S. § 745.5b). Section 5.1(a) of the RRA (71 P.S. § 745.5a(a)) directs the State Board of Education (Board) to respond to all comments received from us or any other source.

1. Fiscal impact of the regulation.

The Board's response to Regulatory Analysis Form (RAF) Question #20 states that the proposed regulation will not impose any new costs on school districts; however, commentators raise concerns about the costs of this regulation, including costs for such procedures as redesigning curriculum, remediation and project-based assessments. We agree that the RAF does not adequately address fiscal impacts. We ask the Board to consult with the regulated community to gain a thorough understanding of the fiscal impacts of this proposal and include those findings in the RAF submitted with the final-form regulation.

REGULATORY ANALYSIS FORM QUESTION 23

Submitted by the State Board of Education

Received by IRRC • Oct. 18, 2013

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
SAVINGS:	\$	\$	\$	\$	\$	\$
Regulated Community	NA	NA	NA	NA	NA	NA
Local Government	\$0	\$0	\$0	\$35,000,00 0	\$35,000,00 0	\$35,000,00 0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Savings	\$0	\$0	\$0	\$35,000,00 0	\$35,000,00 0	\$35,000,00 0
COSTS:						
Regulated Community	NA	NA	NA	NA	NA	NA
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Costs	\$0	\$0	\$0	\$0	\$0	\$0
REVENUE LOSSES:						
Regulated Community	NA	NA	NA	NA	NA	NA
Local Government	NA	NA	NA	NA	NA	NA
State Government	NA	NA	NA	NA	NA	NA
Total Revenue Losses	NA	NA	NA	NA	NA	NA

REGULATORY ANALYSIS FORM QUESTION 18

**Submitted by the State Board of Education
Received by IRRC • 2010**

(18) Provide a specific estimate of the costs and/or savings to local governments (school districts) associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

COSTS:

- Districts already have considerable state resources to support this work, including Basic education funding (2008-09 enacted: \$5.23 billion), Accountability Block Grant (08-09 enacted: \$271.4 million) and Education Assistance Program funding (08-09 enacted: \$65.1 million). In 2008, the legislature also enacted a school funding formula, setting a goal in law to meet the state's responsibility for helping all school districts achieve a resource level based on what is needed for student success. These resources could offset supplemental instruction (estimated average per-student cost: \$600) and also fund district- and building-level management of the project-based assessment established under 4.51(n)(1). Districts will have considerable flexibility in these components of the regulation.

(20a) Provide the past three year expenditure history for programs affected by the regulation. NOTE: As of the date of submission of this document, there is no 2009-10 education budget; FY 2008-09 is shown as the current fiscal year.

Program	FY -3 (05-06)	FY -2 (06-07)	FY -1 (07-08)	Current FY (08-09)
Basic Education Subsidy	4,492,184,000	4,784,264,000	4,951,429,000	5,226,142,000
Pennsylvania Assessment	20,356,000	20,094,000	31,619,000	54,400,000
Accountability Block Grant	200,000,000	250,000,000	275,000,000	271,425,000
Education Assistance Program	66,000,000	66,000,000	65,683,000	65,142,000
Teach Prof Dev.	13,867,000	23,367,000	30,367,000	42,556,000

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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

Chairman, Education Committee

Caucuses

PA Higher Education Assistance Agency, Member
Board of Directors
PA Historical and Museum Commission
Black History Advisory Committee, Member
PA Legislative Black Caucus, Member

November 12, 2013

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

Dear Chairperson Lutkewitte.

. . . The Board's response to question #20 in the 2013 RAF neglected to note that in the RAF prepared for the Chapter 4 regulations in 2010 (question #18), the Board included in its response state funding to offset local costs that no longer exist in 2013.

In the 2010 RAF on Chapter 4 regulations the Board stated "Districts already have considerable state resources to support this work, including Basic education funding (2008-09 enacted: \$5.23 billion), Accountability Block Grant (08-09 enacted: \$271.4 million) and Education Assistance Program funding (08-09 enacted: \$65.1 million). In 2008, the legislature also enacted a school funding formula, setting a goal in law to meet the state's responsibility for helping all school districts achieve a resource level based on what is needed for student success. These resources could offset supplemental instruction (estimated average per-student cost: \$600) and also fund district- and building-level management of the project-based assessment established under 4.51(n)(1)."

Since 2010, the expected funding from the Accountability Block Grant has been cut by \$175 million and the \$65 million expected funding for tutoring services needed for remediation of students failing the existing and new state assessments through the Education Assistance Program has been eliminated. Equally important, the Board assumed that the state would continue its funding formula that set "a goal in law to meet the state's responsibility for helping all school districts achieve a resource level based on what is needed for student success." The state ended this funding formula in 2011 and has cut overall state education funding by nearly \$1 billion since 2010. In 2010 the Board had assumed that these additional funding sources would provide school districts with the needed funding resources to meet the goals of the new Chapter 4 regulations. With the reduction or elimination of these funds by the state this is no longer the case.

This fact needs to be seriously considered by the Independent Regulatory Review Commission in its consideration of whether to approve these regulations. Requiring school districts to meet the new requirements of these revisions to Chapter 4 regulations and requiring that all students must pass the new Keystone Exams or similar project based assessments without providing sufficient funding resources to school districts to meet these requirements does not serve the best interests of our students or our Commonwealth.

Sincerely,

Handwritten signature of James R. Roebuck in black ink.

James R. Roebuck
Democratic Chairman
House Education Committee
188th Legislative District

Handwritten signature of Mark Longietti in black ink.

Mark Longietti
Subcommittee Chair on Basic Education
House Education Committee
7th Legislative District

August 2012 survey conducted by PASBO and PASA to determine impact of FY 2012-13 state budget. Of 500 districts, 264 responded (53%). Similar survey administered in August 2011 for 11-12 year, 294 responded (59%)

Early childhood and education program cuts

Area	12-13 survey	11-12 survey
Reduced/eliminated pre-k	4%	6%
Reduced/eliminated full day Kindergarten	2%	5%
Increased class size	51%	70%
Reduced elective course offerings (foreign language, arts, music, physical education)	43%	44%
Delayed textbook purchases	40%	41%
Tutoring programs	32%	35%
Eliminate summer school	21%	19%

Other Program, Activity & Service Cuts

Area	12-13 survey	11-12 survey
Reduced/eliminated field trips	43%	55%
Reduced/eliminated extracurricular, including establishing/increasing fees for participation	30%	33%
Delayed building/renovating school buildings	20%	16%
Closed school buildings	7%	10%

Reliance on Fund Balance

Area	12-13 survey	11-12 survey
Used reserves to balance budget	70%	72%

KEYSTONE TEST RESULTS 2012-2013

ALGEBRA ONE

Over 1/3 of students failed

BIOLOGY

Over 1/2 of students failed

LITERATURE

Over 1/4 of students failed

WCASD EDUCATION COMMITTEE

TO: Board of School Directors
FROM: Robert Fraser, Ed.D.
SUBJECT: Keystone Exams: Winter Schedule and Biology Specialists Proposal
DATE: November 7, 2013

At the November 11, 2013 Education Committee meeting, Dr. Sokolowski and I will provide an update regarding the scheduling of Keystone Exams during the upcoming winter test administration window. These exams will be administered on the following dates:

- Algebra I December 3 and 4, 2013
- English Literature December 10 and 11, 2013
- Biology January 8 and 9, 2014

Additionally, we will provide the Board with a rationale for a 2014-15 staffing request of an additional 3.0 full-time teacher allocation at the high school level for Biology Specialist positions. The addition of these positions in the 2014-15 budget would equip us to meet the needs of our high school students as they relate particularly to performance on the Biology Keystone Exam, much the same way that the current Math Specialist positions are assisting students with Algebra I Keystone Exam performance. The budgeted cost for the addition of these positions is \$251,901.00 (\$83,967.00 per teacher for salary plus benefits). The addition of these positions would at least partially offset costs for which we would otherwise need to allocate funds in order to address two specific Chapter 4 mandates related to the Biology Keystone Exam component of the new graduation requirements:

1. The proposed Chapter 4 regulations mandate that, beginning with the class of 2017, supplemental instruction be provided before any non-proficient student is eligible to retake a Keystone Exam. This class of students will be in 10th grade in the 2014-15 school year.
 - Fulfilling this mandate with a full-time Biology Specialist would be value-added because it would enable us to provide this supplemental instruction during the regular school day at times that are least intrusive to a student's schedule, as opposed to attempting to schedule it before or after school.
 - Having a full-time Biology Specialist would ensure that non-proficient Biology Keystone Exam students have consistent access to a Biology-certificated teacher, which is especially pertinent from a student learning standpoint because in most cases their course progression has advanced them to Chemistry or Physics.
 - The district-wide cost minimum estimate for providing the supplemental instruction before or after school is \$77,782.00. Without the availability of this full-time position in each high school, we would incur this estimated \$77,782.00 expense in fulfilling this mandate.



November 19, 2013

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


Dear Chairman Lutkewitte:

. . . Among PSBA's concerns with the Chapter 4 proposal:

- *School districts will face new and continuing costs; PSBA supports the development of a complete fiscal analysis before final approval.* It has been suggested that the proposed regulation will not impose any new costs on school districts. PSBA believes this regulation will impose costs on school districts as they continue to adapt their curriculum and instruction to be aligned with the new academic standards and assessments, and to update textbooks and materials. There are professional development and training costs as well as student remediation costs. Districts will have to develop extensive recordkeeping systems to match students with the Keystone Exams that have been successfully completed and those for which remediation will be necessary in addition to the various modules that have to be taught in remediation classes and to ensure that students needing remediation in certain modules are enrolled in the proper classes. Districts will also incur the costs related to the project-based assessments that are discussed later in these comments.
- *The Keystone Exams are high stakes assessments.* PSBA supports the use of Keystone Exams as end-of-course assessments; they can serve as an important measure of student performance in core content areas. Although Keystone Exams are labeled as end-of-course exams, they are, in fact, also high-stakes exit exams. PSBA believes that assessments don't have to have high-stakes consequences to send meaningful signals to students and schools. Testing should inform and enhance instruction, not impede instruction. PSBA believes that the State Board should retain the Keystone Exams but modify the implementation to lessen their high-stakes impact and provide additional flexibility. With this in mind, the association suggests the following options for the Board's consideration:
 - Maintain the use of Keystone Exams as a graduation requirement but allow school districts to determine the weight needed to receive a diploma.
 - Administer Keystone Exams for federal accountability requirement purposes only.

In either option, the regulations should maintain the requirement for remediation for students who need extra help. The state could create incentives for schools to reach varying levels of student performance.

Sincerely,


John Callahan
Senior Director of Government Affairs



Pennsylvania Association of School Administrators

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(717) 540-4448 (717) 540-4405 fax www.pasa-net.org

November 18, 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:

. . . Although we believe the changes to Chapter 4 are a positive step forward, we continue to have the following concerns, based upon the principles and aspirations for public education that are outlined in the PASA Resolutions document and which reflects the position of the Association:

- The regulations continue to diminish local control of education policy.
- The regulations impose new unfunded state mandates (remediation and project-based assessment) that will drive local taxes up at the same time as state funding for classroom instruction and supports remains relatively flat.
- The proposed regulations are not research-based nor adequately funded to ensure that accountability in management and educational progress is both measurable and achievable.
- School leaders were not a partner in developing and implementing the standards and statewide assessments, procedures and timelines, so they will impose undue burdens and stress on both students and staff instead of promoting a positive classroom testing environment that provides students with the best opportunity to demonstrate their understanding of curriculum content.
- The policies are not research-based, do not reflect the reality that students have individual needs, nor do they recognize that evaluation of student achievement should be based on the individual student's progress in mastering those standards, and not measured by success on a single test.
- The regulations, while an improvement over the current regulations, will continue to impose a new state assessment system that adversely impacts student learning time.
- PASA opposes the use of any standardized test as the sole criteria for school districts, school or staff evaluation, or as a standard for student graduation. . . .

Sincerely,

G. Brian Toth
President

Sherri Smith
President-Elect

Eric C. Eshbach
Past-President

Richard W. Fry
Treasurer

Jim Buckheit
Executive Director



Allegheny Intermediate Unit

Educational Opportunities • Innovative Solutions • Leadership Excellence

November 19, 2013

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

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

Dear Chairman Lutkewitte:

... 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,

A handwritten signature in black ink that reads "Dr. Linda B. Hippert". The signature is written in a cursive, flowing style.

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



A Coalition of Pennsylvania's Public School
Superintendents and Intermediate Unit Executive Directors

November 5, 13

The Honorable Andrew Dinniman
One North Church Street
West Chester, PA 19380

Dear Senator Dinniman,

Thank you for the opportunity to present information regarding the impact of the Keystone Exams on Pennsylvania's public schools. . . .

Call to Action

In conclusion, Pennsylvania school districts welcome rigor, high expectations, and accountability and have willingly and regularly invested time and resources to equip students with the skills they need to be college and career ready. However, the costs associated with the implementation of the Keystone Exams and delayed communication about Pennsylvania's changing accountability system has negatively impacted districts, students, and their families. School districts are concerned that the financial and student impact will become even more pronounced in the future as districts implement supplemental instruction and Keystone project-based assessments.

As a result, we urge the Administration, the Pennsylvania Department of Education and the General Assembly to seek additional information and suggested solutions from intermediate units and school districts who see first-hand the unintended consequences of high-stake testing on resources, teachers and students. **¶ We urge the Pennsylvania General Assembly not to require Keystone Exams as graduation requirements.** Pennsylvania's educational leaders welcome the opportunity to provide additional measures of the impact of increased testing and changing accountability systems on our schools. . . .

Respectfully submitted by a Southeast Pennsylvania Coalition of Pennsylvania's (58) Public School Superintendents and (4) Intermediate Unit Executive Directors.

NEIU 19

1200 Line Street
Archbald, PA 18403-1918
(570) 876-9240
Fax: (570) 876-8660

Northeastern Educational Intermediate Unit

Clarence R. Lamanna, Ed.D.
Executive Director

November 18, 2013

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

Attention: David Sumner:

- . . . Our school districts are battling to preserve student services while under an assault of fiscal hardships. We have simultaneously experienced a substantial increase in reporting demands often coupled with a lack of clarity. Costly mandates have drained our resources and limited our flexibility to develop local solutions best suited to the unique needs of our local populations.

We recommend that the Pennsylvania Department of Education suspend its effort to require Keystone Exams as graduation requirements. We also look forward to working with our legislators and policy makers to develop sustainable accountability measures for our schools and students.

Finally, we thank you for your efforts on behalf of our communities.

Respectfully submitted by Northeast superintendents including: (see attached signature page)

cc: The Honorable Andrew Dinniman
cc: The Honorable John Blake
cc: The Honorable Lisa Baker

Serving the Schools of Lackawanna, Pike, Susquehanna, Wayne and Wyoming Counties
NEIU is an Equal Opportunity Employment, Educational and Service Organization

PSEA

We arrived at the \$300 million dollar based on a number of assumptions. The first one was that the class size for remediation would be 20 students. We estimated the cost of giving a class at \$31,919. Then we simply took the number of students who would necessitate the class when they are fully operational based on the scores that we have. These costs will continue to rise as the tests become fully operational. Also left out of our model is what the cost of remediation for a student that scores below basic. We have the cost being the same for score of basic and below basic.

Let me know what else you need.

**Thanks,
Greg**

ANDREW E. DINNIMAN

STATE SENATOR
19TH DISTRICT

182 MAIN CAPITOL BUILDING
SENATE BOX 203019
HARRISBURG, PA 17120-3019
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Senate of Pennsylvania

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POLICY
STATE GOVERNMENT

BEN FRANKLIN TECHNOLOGY DEVELOPMENT AUTHORITY
EDUCATION COMMISSION OF THE STATES
JOINT LEGISLATIVE CONSERVATION COMMITTEE
LIFE SCIENCES AND BIOTECHNOLOGY CAUCUS, CO-CHAIR
PENNSYLVANIA CHARITABLE NONPROFIT CAUCUS, CO-CHAIR
PENNSYLVANIA HIGHER EDUCATIONAL FACILITIES AUTHORITY
STATE BOARD OF EDUCATION
STATE PUBLIC SCHOOL BUILDING AUTHORITY

May 9, 2013

Ronald J. Tomalis, Secretary
Pennsylvania Department of Education
333 Market Street
Harrisburg PA 17126-0333

Dear Secretary Tomalis:

I have requested on more than one occasion from the Department the school testing results in existence to date for the PSSA test and the Keystone exams, actual, field, sample or otherwise. In response, I was directed to the Department's website that contains links to various testing results and informative testing documentation. With these links I was able to access some of the information that I was requesting, however, key information I am requesting is missing. . . .

As the Democratic Chair of the Senate Education Committee, I have had several Senators ask me for this type of data and Keystone exam results for the schools in their districts for their review of the proposed changes to Chapter 4 regulations. I am under the impression that the information I am requesting does exist and that you have failed to provide it to me as I have requested. Again, I am asking that you provide me with the information that I am missing by Friday so that I may thoroughly review the implications of the proposed Chapter 4 regulations over the weekend, and further, so I may provide it to those who are also requesting it from me.

Sincerely,

A handwritten signature in black ink that reads "Andrew E. Dinniman".

Andrew E. Dinniman
State Senator – 19th District

ANDREW E. DINNIMAN

STATE SENATOR
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Senate of Pennsylvania

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STATE BOARD OF EDUCATION
STATE PUBLIC SCHOOL BUILDING AUTHORITY

June 11, 2013

Dr. William E. Harner
Acting Secretary
Department of Education
333 Market Street
Harrisburg PA 17126

Dear Dr. Harner:

I am writing to repeat my request for certain information that was not provided to me as formally requested of Secretary Tomalis in my correspondence on May 9, 2013. I hope that you are able to provide me with this requested information so that I, and my caucus, will not have to make a decision regarding the need to proceed with a formal request under the Right to Know law.

Once again, as a member of the legislature and as the Democratic Chair of the Education Committee, I am requesting the information which I have repeatedly requested but which all of the Department's responses, including Sec. Tomalis' formal response, failed to provide.

I was not adequately provided the requested individual school district data, results and scores of any Keystone exams, actual, field, sample or otherwise, taken by students in prior years whether used as a calibration tool of the exam or an assessment of the student. Sec. Tomalis specifically refused to make available the information requested although he did acknowledge that the same did exist. The results and data, including but not limited to, the grade level of the students, the district and identification of each school of those Keystone or similar type exams that were administered, whether field or otherwise, whether for calibration purposes or assessment purposes, are what I am requesting you provide me at this time. If you elect to not provide me with the information that clearly exists, please explain to me your reason for denying my request. . . .

. . . I need the requested information to make a thorough review of the implications of the proposed Chapter 4 regulations. A thorough review would require knowledge of each individual school's scoring results to date regardless of the basis for the testing to form a complete understanding of the progression of the regulation.

Again, as I stated in my correspondence of May 9, 2013, as the Democratic Chair of the Senate Education Committee, I have had several Senators ask me for this type of data and Keystone exam results for the schools in their districts for their review of the proposed changes to Chapter 4 regulations. Kindly forward me any information that is missing in the formal response that was provided by former Sec. Tomalis to my continued prior request in an expedited manner.

Sincerely,

A handwritten signature in black ink that reads "Andy".

Andrew E. Dinniman
State Senator - 19th District

C - 3

June 24, 2013

The Honorable Andrew Dinniman
Minority Chair
Senate Education Committee
Room 182 Main Capitol Building
Harrisburg, PA 17120

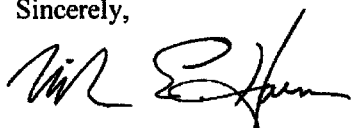
Dear Senator Dinniman:

It was indeed a pleasure meeting with you on June 3rd. I greatly appreciate the opportunity and time that you took with me to share your views on several key education issues. I look forward to working with you and other members of the Senate Education Committee on improving the quality of public education throughout the Commonwealth.

The purpose of this letter is to respond to your June 11th letter, requesting information pertaining to individual school districts' state assessment results. As an advocate for transparency, accountability, and service, I wanted to reach out to you quickly with a response. Your letter made two specific requests regarding assessment results. The first was asking for individual school district data from the Keystone Exams administered in previous years. The second was a request for the 2013 Keystone Exam results, once the data is finalized. The second request is the easiest to answer, and the answer is yes – as soon as the data is validated and finalized. PDE would be delighted to provide you a desk-side briefing once we are in receipt of the results. We expect that 2013 Keystone Exam summary reports will be available to school districts and schools on July 22, 2013, followed by PSSA summary reports which will be available to school districts and schools in early fall. Please let us know your preference on how you would like to be presented the results; we will certainly accommodate your schedule. . . .

. . . At PDE, we want to be as transparent as possible regarding the 2012-13 test results. Therefore, as soon as the finalized data is available, I will be happy to provide you with a personal briefing of these results. Please let me know if you would like to have this arranged.

Sincerely,



William E. Harner, Ph.D.
Acting Secretary of Education

**Using the Keystone Exams
as a Graduation Requirement
is not a Federal Requirement
or required as part of our
waiver from NCLB.**

**It was added to Chapter 4
Regulations
by former Secretary of
Education Ron Tomalis
and at his request by the
State Board of Education.**

- 43RD DISTRICT
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- 2308 BROWNSVILLE ROAD
PITTSBURGH, PA 15210
PHONE: (412) 884-8398
FAX: (412) 888-2080
- 314 EAST EIGHTH AVENUE
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PHONE: (412) 462-4204
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Senate of Pennsylvania

November 18, 2013

COMMITTEES
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Lawrence J. Tabas, Esq.
Dennis A. Watson, Esq.
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Commissioners,

I am writing to the Independent Regulatory Review Commission (IRRC) on behalf of myself as Senate Democratic Leader and on behalf of all 23 members of the Democratic Caucus. . . .

. . . Our caucus strongly believes that it is unfair to label failure on students because of poverty and the resulting inequitable tax base, and/or the elimination of state budget line items.

These regulations also involve a significant financial burden on school districts for supplemental instruction and many districts simply do not have the resources for that task. Districts such as Philadelphia, our largest district, are simply struggling to stay open by increasing class size and closing resources such as libraries.

Despite repeated requests from our Caucus Education Chair, Senator Andy Dinniman, PDE has refused to provide any fiscal note or adequate financial analysis of the costs of the Keystone Exams for school districts and the Commonwealth. The bottom line is that despite the IRRC asking the same questions as to the costs involved, PDE has given an inadequate, incomplete, and weak fiscal analysis and response.

When PDE signed the exemption waiver for No Child Left Behind, they promised to provide the Federal government with an analysis of costs to the commonwealth. The Pennsylvania State Education Association has estimated the costs to school districts to be \$300 million dollars. Despite this, PDE continues to say there is no cost.

Fiscal implications and costs are an essential part of the review of any regulation. Our caucus is concerned about IRRC approval of these Chapter 4 regulations, which include graduation exams, without a full and complete fiscal analysis from PDE and the State Board, and urge you not to give approval.

Respectfully,

Jay Costa
Democratic Leader
State Senator - 43rd District

John Blake
Lisa Boscola
Jim Brewster
Andrew Dinniman
Lawrence Farnese
Jim Ferlo
Wayne Fontana
Vincent Hughes

Richard Kasunic
Shirley Kitchen
Daylin Leach
Judy Schwank
Timothy Solobay
Matt Smith
Michael Stack
Christine Tartaglione

Rob Teplitz
LeAnna Washington
Anthony Williams
John Wozniak
Sean Wiley
John Yudichak

I think what we're seeing nationally is an effort to apply something called "Big Data" to education, and education has always been understood in this country – and every other country, as far as I know – as first and foremost the interaction between teachers, adults and children. It can work well and it can not work well, and if it doesn't work well, you try and intervene to find out why. But it's primarily human interactions. What's happened now is we're in a moment of Big Data where management consultants like McKinsey and the government and the big thinkers think that everything can be reduced to data and, if you just manipulate the data, you can come up with the answers.

Ultimately, you're dealing with children and each one of them is different and Big Data doesn't really supply an answer when you're looking in the face of a child. That's one person and that one child needs something different from the next one and he or she is not a data point. He or she is a person.

THE GENERAL ASSEMBLY OF PENNSYLVANIA

SENATE BILL

No. 1113 Session of
2013

INTRODUCED BY DINNIMAN, BREWSTER, TEPLITZ, SCHWANK, FONTANA,
COSTA, VULAKOVICH, BRUBAKER AND TARTAGLIONE,
SEPTEMBER 26, 2013

SENATOR FOLMER, EDUCATION, AS AMENDED, OCTOBER 21, 2013

Bill Information

History

Regular Session 2013-2014
Senate Bill 1113

Sponsors: DINNIMAN, BREWSTER, TEPLITZ, SCHWANK, FONTANA, COSTA, VULAKOVICH, BRUBAKER and TARTAGLIONE

Printer's No. (PN): 1502*, 1408
(denotes Current Printer's Number)*

Short Title: An Act amending the act of March 10, 1949 (P.L.30, No.14), known as the Public School Code of 1949, in preliminary provisions, further providing for Keystone Exams; and, in State Board of Education, further providing for powers and duties of the board.

Actions: PN 1408 Referred to EDUCATION, Sept. 26, 2013
PN 1502 Reported as amended, Oct. 21, 2013
First consideration, Oct. 21, 2013

Angela John

143 Candlewyck Drive Avondale PA 19311 610-444-4649

Testimony IRRC Hearing

November 21, 2013

Good morning.

My name is Angie John. I am a mom of three boys, in first, fifth and sixth grade in the Kennett Consolidated School District, in Chester County. I am a VP on the PTO Board of two schools in my school district. Because I am at school often, I learned last spring that whatever the PTO purchased for our library had to now be Common Core aligned. I thought what is Common Core? I researched all summer what Common Core was, who developed it, who paid for it, I read the actual standards and saw examples of lessons to be learned that meet the Common Core Standards. The Standards said over and over that they want students to give answers based on "evidence from the texts" when answering questions, I thought, I want to see the Common Core text books. What content will exactly be taught within the Common Core Aligned books?

I found out quickly when my son brought home a Common Core aligned book published by Triumph Learning. By the way, the Gates Foundation gave Triumph Learning a grant to develop "College-Ready" curriculum materials (1)

Well this is the college ready curriculum material: It's called, English Language Arts Grade 6 Crosswalk Coach for the Common Core State Standards (2)

Some examples of the biased information found in this book are the following:

On page 40 it states a "Simile Example: The woman's face looked wrinkled as an old paper bag. Meaning: The woman's face is old and lined with wrinkles."

For the Simile, did the Common Core book have to offend our senior population? I wouldn't let my son learn this simile nor would my school accept our students saying this to anyone during school, I was told by the Principal.

On page 116 it states, "We all need to remember we are not alone on this planet. We are not the most important species on Earth"

This is supposed to be the Authors point of view, which is fine. My concern is that I can't find an author's point of view in the whole book that is from a "conservative view". Conservative and liberal points of view are not both represented, but only liberal points of view are shown. This book is biased.

Page 118 "If you ever wondered where the phrase "dirty politicians" comes from, you might look back to the Teapot Dome Scandal of 1920's.....Albert B. Fall may well have caused the first "fall" of the honest politician." **This is an example of a propaganda technique, but again, the "bad guy" here is the Republican. And do you think 6th Graders ever discuss dirty politicians? No.**

page 210 "Slang is very informal language or phrases....Slang is often acceptable in speaking but not writing, unless it is part of a character's dialog. Here are some examples of slang for the word good. They use the word "phat " as one example.

PHAT means pretty hot and tasty, I was told, I couldn't believe it, so I looked it up...

Word Origin & History

phat

hip-hop slang, "great, excellent," 1992, originating perhaps in the late 1980s and meaning at first "sexiness in a woman." The word itself is presumably a variant of

(q.v.) in one of its slang senses, with the kind of off-beat spelling preferred in street slang (cf. boyz).

The spelling is attested as far back as 1678, as an erroneous form of fat (a classical over-correction; see ' -ph-). This spelling is said by some to be an acronym, but various versions are given: "pretty hot and tasty," or "pretty hips and thighs" them. These, too may have been innovations given as explanations to women who felt insulted by the word.

So to sum up my first experience with a Common Core aligned book, developed with financial help from the Gate's Foundation, you can see it is very disturbing. I literally had to explain to my son, read this Common Core book, do your assignment or take your test and then you must forget what you just learned, because it is rude, inappropriate and inaccurate. I don't even have time to speak about the inaccurate history in this book!! There are many.

As far as the argument that the State of Pennsylvania is only saying that the Standards have to be met, that the schools can pick any curriculum book to reach those standards, that the schools can pick any curriculum to prepare for the Standard aligned tests. **Well, it doesn't take a rocket scientist to know that if you say that we need to meet the PA Core Standards/Common Core Standards, same thing, I read them side by side, you know that the schools do not have a choice other than to choose those books that teach the Standards and those Coach books that Coach the kids to take the Common Core aligned standardized tests.** Why would they study from a book that is not Common Core? They would not meet the Standards nor do well on the tests. The schools must adhere to this unspoken law of the Common Core Curriculum!

Another personal hardship that the parents have to deal with when it comes to the Common Core Standards is the melding in our personal home life. Stay out of our homes. This is what was given to parents at our Back to School Night in the 5th Grade in Kennett Consolidated School District. (3). Common Core being asked to enter into our private homes. "Supporting the Common Core at Home" Ask "why" when children tell you they want something or want to do or not do something". Are you kidding me? When I say do your homework I mean do your homework. I am not looking for a conversation here. Please do not tell me how to speak to my children.

Lastly, on the topic of Pennsylvania even accepting the Common Core Curriculum in the first place I find it ridiculous that in 2010 the PA State Board of Education (an unelected committee) made this huge decision of committing Pennsylvania to unfunded mandates and federal regulations without a fiscal analysis Why? Does this make any sense? How can this happen? This was done without going before our elected officials in the State Legislature, and without publicizing and explaining it appropriately to Pennsylvania's mom's dads and all the citizens of Pennsylvania. This autocratic action by the PA DOE was a blatant circumvention of the Democratic process. Incredibly, it was only a few months before full implementation was to begin (in July of 2013) that even some citizens became aware of Common Core. Even now, a majority of citizens and many legislators are still clueless as to its potential ramifications and consequences. For this reason, Pennsylvanians must unite in urging our Legislature to pass laws that will prevent a situation of this sort from ever happening again Pennsylvania's curriculum standards must be developed without the intrusion of the Federal Government, special interest groups, and special interest foundations. **Only the people of Pennsylvania, the teachers, the school administrators, and the parents should develop the curriculum and the standards for the State of Pennsylvania.**

- 1.
2. P 4. Common Core State Standards Correlation Chart, English Language Arts Grade 6 Cross Walks Coach for the Common Core Standards.
- 3.

3 KEY IDEAS FOR PARENTS about the Common [CORE]

Thinking Deeply

Parents should encourage their children to think deeply about what they are learning. This means asking questions, making connections, and applying knowledge to new situations. *Take Away* Really thinking deeply is hard, and it's hard, well, to think out.

Integrating Learning

Learning should be integrated across subjects and real-world contexts. Students should see how math, science, and language arts are connected. *Take Away* Problems & solutions happen everyday in the real world.

Showing How They Know

Students should be encouraged to show their understanding through projects, presentations, and writing. This helps them articulate their thoughts and learn from others. *Take away* The new tests will require students to explain how they know.

Supporting The Common Core at Home

Parents can support the Common Core at home by reading together, discussing current events, and encouraging their children to ask questions. *Take away* The new tests will require students to explain how they know.

**PENNSYLVANIA PARTNERSHIPS FOR CHILDREN
BILL BARTLE PUBLIC COMMENTS TO THE
INDEPENDENT REGULATORY REVIEW COMMISSION
ON FINAL-FORM REGULATION #6-326 – STANDARDS AND ASSESSMENTS
NOVEMBER 21, 2013**

Good morning. I'm Bill Bartle, the Education Policy Director for Pennsylvania Partnerships for Children - a statewide, independent, non-partisan child advocacy organization committed to improving the education, health and wellbeing of children in the commonwealth.

PPC strongly supports the final-form Chapter 4 regulations and urges the commission to approve them.

For too long, Pennsylvania has graduated tens of thousands of students each year who received their diploma despite failing to demonstrate proficiency in reading and math. One-third of all students who graduated in 2012, or about 44,000 young people, did not score proficient or advanced on the 11th grade PSSAs or the 12th grade retake. We are sending these young people into the world lacking the educational foundation to succeed in postsecondary education, the workforce and the military without the need for costly and time-consuming remediation.

The regulations you are voting on today address these concerns by adopting the PA Core Standards, which are based on the Common Core State Standards, but were created by Pennsylvania teachers specifically for Pennsylvania. These more rigorous, internationally benchmarked standards outline what students should know and be able to do at each grade level. They do not tell teachers how they should teach in the classroom or what materials to use. Those decisions continue to be made by school districts, thereby maintaining Pennsylvania's long-standing tradition of local control – and the vast majority of school districts across the state have already been working for the past three years to align their locally developed curriculum to the PA Core Standards and Keystone Exams.

The Keystone Exams, which are aligned to the PA Core Standards, are end-of-course exams that a student takes at or near the completion of the course. So for example, when a student

completes Algebra I, whenever that is, they take the Algebra I Keystone Exams to demonstrate that they have achieved the Algebra I standards while the content is fresher and more relevant to the student – not 2 or 3 years later like had been happening with the 11th grade PSSA.

It's important to note that Pennsylvania **already adopted** the Common Core State Standards in 2010 and those standards took effect on July 1 of this year. The final-form regulations before you today move away from the Common Core State Standards and adopt the Pennsylvania-specific PA Core Standards. As I mentioned earlier, school districts have already spent countless hours aligning their local curriculum with the PA Core Standards and if the regulations are not adopted, districts would now have to abandon that work and align their curriculum to the national Common Core standards instead.

Additionally, if the regulations before you today are adopted, there will be five Keystone Exams phased in through 2020 and students will need to demonstrate proficiency of the standards on the Keystone Exams or another approved assessment to graduate beginning in 2017. If the regulations are not adopted, PDE will be required to develop and implement 10 Keystone Exams and students will need to take six of them (so yes, students will take an additional Keystone Exam if the regulations are not adopted). The Keystone Exams must count for at least 1/3 of the student's final grade in the course, and begin to be graduation requirements in 2015 – two years sooner.

Importantly, both the existing regulations and the final-form regulations being voted on today have supports for struggling students – including supplemental instruction. If the regulations are approved today, school districts will be required to provide supplemental instruction in the five courses with Keystone Exams. If the regulations are not approved today, school districts would be required to provide supplemental instruction in the 10 courses with Keystone Exams.

As I have noted, the regulations before you also build on the concept of local control. Here's how:

- Under these regulations, the Local Chief School Administrator, such as the school district superintendent, will be able to grant graduation waivers to students who do not demonstrate proficiency of the standards because of extenuating circumstances. If the regulations are not approved, only the Pennsylvania Secretary of Education can grant such graduation waivers.
- If these regulations are adopted, the state-mandated requirement that every student must complete a senior project to graduate is eliminated. If the regulations are not adopted, that state mandate continues.
- Also, if these regulations are adopted, the state-mandated requirement that school districts have a long-term strategic plan is eliminated. Again, if these regulations are not adopted, that state mandate continues.

So again, Pennsylvania Partnerships for Children strongly supports adoption of the final-form Chapter 4 regulations before you. These regulations are a sensible approach to ensuring the commonwealth's children have demonstrated proficiency of the PA Core Standards and are prepared to successfully transition to postsecondary education, the 21st century workforce, military service and productive citizenship.

Testimony to the IRRC, November 21, 2013
Why you should say NO to the current version of
Chapter 4 Academic Standards and Assessments

Elliott Seif, the author of this testimony, is a retired educator with a PhD in educational research from Washington University in Saint Louis. He was a social studies teacher, Professor of Education at Temple University, and the Director of Curriculum/Instruction Services for the Bucks County Intermediate Unit. In retirement, He is currently an educational advocate and consultant, writer and author. E-mail: era3learning@gmail.com

Recommendation #1: Vote NO to the Keystone exam graduation requirements in the revised Academic Standards and Assessments regulations. Key reasons are:

The requirement will prevent many worthy and potentially successful students from moving on to a post-high school program. Think about the very diverse students, school programs, schools and graduation requirements in place across the state, and the fact that 83% of Pennsylvania's students now graduate and most go on to some form of post high school education. If the Keystone exam graduation requirements go into effect, it won't matter whether a student passes all of his or her high school courses, has artistic or musical abilities, is an excellent writer or athlete, passes two of the three exams (or later four of the five exams) fails to pass one exam by not correctly answering two more questions, or is a poor test taker – she will not get a diploma! There is even a possibility that a student with all A's will not be able to graduate due to an inability to pass one exam! This will frustrate and increase the anxiety of many students, cause more students to drop out of school, and force them to place their energies on passing these tests rather than developing their diverse skills, talents and interests.

There will be significant additional burdens and costs to schools and districts across the State. As one school superintendent said: "[Administering these exam requirements] is an operational nightmare!" that means eventually offering and proctoring fifteen exams throughout the school year and summers, mentoring and tutoring students, keeping records of complex exam results, working with 15 hour projects for students who fail twice, and figuring out how to use the tests effectively.

My conservative estimate is that it will cost districts across the state more than \$80,000,000 to implement these tests. Some estimates run as high as 200 to 300 million dollars per year. Whatever the actual figures, we are talking about a lot of money that could be better used in these tough economic times to support effective school and district programs.

The exam requirements are bad educational policy and will have many serious negative consequences. For many students, the pressures of taking these tests will most likely lower their motivation to stay in school and their engagement in school programs. There will be more test-prep activities and a narrowing of the high school curriculum. The requirements will "suck the oxygen" out of efforts to broaden more relevant student activities and experiences. Schools are less likely to promote innovative, interdisciplinary activities that foster important skills such as research, thinking and creativity, writing, or collaborative problem solving, all of which are major aspects of college and career readiness.

And here's something else we can look forward to. Eventually, as has happened in New York State, the exams will probably become simplified and "dumbed down" in order to get more students to graduate. This will render the results meaningless (see attached commentary from a New York State teacher)

The exams are not relevant to most student needs and will not predict which students will succeed in post high school experiences. Take a look at the sample Keystone mathematics and biology questions attached to this handout and ask yourself why we should expect every single one of Pennsylvania's students to be able to answer these advanced math questions or to compare esoteric biology concepts like "prokaryotic" and "eukaryotic" cells? Do we really want to subject all Pennsylvania's students to this burdensome requirement?

The tests will not help to determine who will succeed in post high school education settings. The Pittsburgh school district has conducted research on its own graduates and concluded that, "the most important predictors of post-secondary education success are grade point average and attendance, not state test scores."

Recommendation #2: Support the following alternatives to the Keystone Exam graduation requirements and other changes to the regulations:

1. Require every student to take the Keystone exams, but use the results as a diagnostic tool to improve courses and programs in the Keystone exam subject areas; also, give those students with a proficient or above score on all of the exams a special diploma called the Keystone Academic Honors Diploma.

These alternatives will eliminate most of the problems created by requiring these exams for graduation, and instead will help improve instruction (see attached article - several other states that have high stakes exams are already moving in this direction). There will be a positive incentive to do well on the exams in order to obtain an Honors Diploma. Schools will only have to give the exams once a year instead of three times a year. There will be no need to tutor or mentor students, to offer a test a second time to students who fail the first time, or to do a project with those who fail the exam twice. Individual student record keeping will become unnecessary.

2. Restore the Graduation Project Requirement

This requirement means that students are evaluated on their research, writing and presentation skills. This positive, flexible requirement provides teachers and schools with significant, useful information about whether students are college and career ready. Instead of eliminating this fifteen-year old requirement that has made a significant difference for so many students, the PA Department Of Education should work with high schools to strengthen the project requirement and make it more rigorous, meaningful and significant in all school settings.

3. Use some of the funds saved at the State level to help districts and schools improve their curriculum, instruction and assessment practices. Examples include improving staff development options, developing a website to create and share effective assessment questions, creating writing standards and protocols, supporting districts in their efforts to develop and implement more rigorous courses, and encouraging districts to implement alternative assessment systems and standards based report cards.

APPENDIX

SAMPLE KEYSTONE EXAM QUESTIONS: MATH (1-4) AND BIOLOGY (5-8)

1. Which of the following inequalities is true for all real values of x ?

- A. $x^3 \geq x^2$
- B. $3x^2 \geq 2x^3$
- C. $(2x)^2 \geq 3x^2$
- D. $3(x-2)^2 \geq 3x^2 - 2$

2. An expression is shown below.

$$\sqrt{87x}$$

For which value of x should the expression be further simplified?

- A. $x = 10$
- B. $x = 13$
- C. $x = 21$
- D. $x = 38$

3. Two monomials are shown below.

$$450x^2y^5 \qquad 3,000x^4y^3$$

What is the least common multiple (LCM) of these monomials?

- A. $2xy$
- B. $30xy$
- C. $150x^2y^3$
- D. $9,000x^4y^5$

4. The results of an experiment were listed in several numerical forms as listed below.

$$5-3 \quad 4/7 \quad \sqrt{5} \quad 3/8 \quad 0.003$$

A. Order the numbers listed from least to greatest.

B. Another experiment required evaluating the expression shown below.

$$1/6 (\sqrt{36} \div 3 - 2) + 43 \div 1 - 81$$

What is the value of the expression?

C. The last experiment required simplifying $7\sqrt[3]{425}$. The steps taken are shown below.

$$7\sqrt[3]{425}$$

$$\text{step 1: } 7(400 + 25)$$

$$\text{step 2: } 7(20 + 5)$$

$$\text{step 3: } 7(25)$$

$$\text{step 4: } 175$$

+

One of the steps shown is incorrect.

Rewrite the incorrect step so that it is correct.

Correction:

D. Using the corrected step from part C, simplify $7\sqrt[3]{425}$.

$$7\sqrt[3]{425} =$$

5. Living organisms can be classified as prokaryotes or eukaryotes. Which two structures are common to both prokaryotic and eukaryotic cells?

- A. cell wall and nucleus
- B. cell wall and chloroplast
- C. plasma membrane and nucleus
- D. plasma membrane and cytoplasm

6. Which statement best describes an effect of the low density of frozen water in a lake?

- A. When water freezes, it contracts, decreasing the water level in a lake.
- B. Water in a lake freezes from the bottom up, killing most aquatic organisms.
- C. When water in a lake freezes, it floats, providing insulation for organisms below.
- D. Water removes thermal energy from the land around a lake, causing the lake to freeze.

7. Which statement correctly describes how carbon's ability to form four bonds makes it uniquely suited to form macromolecules?

- A. It forms short, simple carbon chains.
- B. It forms large, complex, diverse molecules.
- C. It forms covalent bonds with other carbon atoms.
- D. It forms covalent bonds that can exist in a single plane.

8. A scientist observes that, when the pH of the environment surrounding an enzyme is changed, the rate the enzyme catalyzes a reaction greatly decreases. Which statement best describes how a change in pH can affect an enzyme?

- A. A pH change can cause the enzyme to change its shape.
- B. A pH change can remove energy necessary to activate an enzyme.
- C. A pH change can add new molecules to the structure of the enzyme.
- D. A pH change can cause an enzyme to react with a different substrate.

News Article...

Exit exams may be on their way out

Ron Barnett, USA TODAY

1 25 p m. EDT May 22, 2013

GREENVILLE, S.C. — South Carolina Rep. Phil Owens says a story he heard from one of his constituents convinced him it was time to do away with the state's requirement that students pass an exit exam to earn their high school diploma.

The man had three sons, all close in age and approaching graduation from high school. One of the brothers had a learning disability in math. He had been unable to pass the math portion of the exit exam after three attempts, even though he had passed all his classes. "He was devastated by the fact that his brothers would continue on to tech school or to college, and he wouldn't, simply because of this test," the Easley Republican said.

Owens, a Republican, found that several states have already had dropped their exit exam or are in the process of doing so, and introduced a bill that would scrap the requirement.

Alabama is phasing out its exit exam and using tests developed by ACT that measure students' readiness for college or work, according to state Department of Education spokeswoman Malissa Valdes-Hubert. Valdes-Hubert said the Alabama High School Graduation Exam that the state had been using wasn't correlated to any of the tests students were being given in earlier grades.

The new system will give educators a continuum of information about individual students' performance by using tests developed by ACT, most known for its college entrance exam, beginning in third grade

"So essentially when a child gets into third grade all the way through 12th grade, we're going to have different types of assessments that they're going to take — none of which are high stakes — that can show a parent, teacher or a counselor how the student is developing through the years and if they're going to be ready for the ACT or similar tests that they may take after high school or in college." she said.

Owens' bill in South Carolina has been passed in the state House and referred to the Senate Education Committee. It calls for setting up a committee to recommend whether to continue using the High School Assessment Program exit exam for federal and state accountability requirements or replace it with something else. But it wouldn't be required for graduation, regardless....

Ron Barnett also reports for The Greenville (S.C.) News

NYS Regents Exams fails students.....again!*

Friday, June 24, 2011 by: Joseph Cea

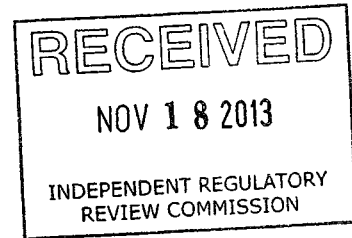
We just scored the results of the 2011 living environment Regents exam and unlike past years we had quite a few students pass the exam but fail the course. This in and of itself may not seem shocking to anyone, but take a quick look at my grade book which clearly shows a pattern of quite a few students not completing homework assignments while still being able to pass an exam that supposedly tests an entire years worth of curriculum. In fact, many of the zero grades were from the last month of the school year where the homework is pretty much dedicated to past exams as practice for the upcoming one. My question would therefore be - how can a student not study and not prepare for an end of the year exam and still pass?

Here is one answer. Going back about a decade NYS decided EVERYONE was going to get a regents level diploma even though most colleges (especially those outside of NYS) could care less about the designation of "regents level". *In order to make this happen the bar for each test was lowered considerably on the various state issued exams so that everyone can get the word regents on their diploma* (my italics). That practice has been ongoing, but instead of an exam that challenges students these lower level tests have had an opposite effect - students are simply not studying because they can pass without doing so. Thus all the regents exams have done are to be a catalyst to start and maintain poor study habits and lack of a drive for excellence (as opposed to just passing). Consider that on the living environment regents exam a student only needs to score 40 out of 85 points to pass with a score of 65. The problem is that 40/85 is only 47% and not 65%!

An article recently in Times Union indicated that graduation rates are up but that many of these same students are unprepared academically for college and beyond, and that is simply because teachers are being forced to teach to the test, because like it or not our effectiveness as educators hinges on regents exams, which is only going to get worse with the new teacher evaluation system now being implemented. Years ago the state purposely created an exam to justify a curriculum switch costing NYS taxpayers millions of dollars in spite of objections from students, teachers and administrators, and in the past decade has enabled and promoted poor study habits with less than challenging exams. One thing is clear - NYS will never get this regents exam thing right. It lowers student expectations and has cost taxpayers millions of dollars in wasted money and simply doesn't accomplish what it sets out to do. I only wish parents and taxpayers could see what the teachers actually have to do to grade the regents exams this year and how much extra time it took to grade them under another new format. Maybe it's just time to abandon this useless practice altogether.

*Edited, shortened version

2976



The Honorable Silvan B. Lutkewitte, III
Chairman
Independent Regulatory Review Commission (IRRC)
333 Market Street, 14th Floor
Harrisburg, PA 17101
Email: irrc@irrc.state.pa.us

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

Dear Chairman Lutkewitte,

I am writing to express PennCAN's support for the final-form regulation 6-326 related to academic standards and assessments. I strongly urge the Independent Regulatory Review Commission's approval.

The Pennsylvania Core Standards and related assessments are rigorous, appropriate and will help ensure that all Pennsylvania students are well prepared for college and careers upon graduating from Pennsylvania's public schools. The improved standards are unique to Pennsylvania and reflect the input and collaboration of numerous parents, teachers, administrators and legislators at the state and local level. These updated regulations reflect the lessons learned by the Common Core State Standards initiative and address key concerns expressed by citizens of Pennsylvania.

Pennsylvania students should be prepared to succeed after graduation

The College Board sets a composite SAT score of 1550¹ (out of a possible 2400) as the benchmark for college and career readiness. In 2012, however, the average composite score for Pennsylvania students who took the SAT was 1472—well below that benchmark.² That so many Pennsylvania students are graduating or leaving school unprepared for higher education or the workplace is, frankly, unacceptable.

This lack of readiness is due in part to the previous academic standards, which offered students inadequate benchmarks for success beyond high school. According to an in-depth 50-state analysis conducted by the Thomas B. Fordham Institute, the standards that were in place prior to Pennsylvania's adoption of the Common Core State Standards in 2010 were vague and repetitive, lacked rigor and essential content and did not lay out a clear progression of skills and knowledge from grade to grade.³ In contrast, the

¹ "SAT College and Career Readiness Benchmark," College Board, accessed September 5, 2013, <http://press.collegeboard.org/sat/sat-college-and-career-readiness-benchmark>.

² "2012 College-Bound Seniors State Profile Report, Pennsylvania," College Board, accessed September 5, 2013, http://media.collegeboard.com/digitalServices/pdf/research/PA_12_03_03_01.pdf, page 1.

³ "The State of State Standards—And the Common Core—In 2010," Thomas B. Fordham Institute, accessed September 5, 2013,

Common Core State Standards, which served as the basis for the newly proposed Pennsylvania Core Standards, were highly rated in each of these areas.

This regulation also reduces the number of Keystone Exams students are required to take from ten to five. Approval will reduce testing time for students and cut in half the number of subjects in which school districts are required to provide remediation and administer project-based assessments.

Pennsylvania students deserve access to an education based on high standards that prepare them for success in college or the workplace. Adoption of the Pennsylvania Core Standards is an important step towards making this vision of great schools for all a reality.

The standards and related Keystone assessments reflect what Pennsylvanians want and need for their children

The Pennsylvania Core Standards benefit from the research and expertise gathered across the country during the drafting of the Common Core State Standards as well as input from the community here in Pennsylvania.

Using the former PA Academic Standards and the rigorous Common Core State Standards as a base, along with feedback from stakeholders across the state, new refinements make these standards *unique to Pennsylvania*. The Pennsylvania Core Standards, for example, recognize the importance of early childhood education by including math and English-Language Arts standards for pre-kindergarten, while the Common Core State Standards don't begin until kindergarten. Input and comments from teachers, parents, school administrators, business leaders and many others were incorporated into these standards, creating the best possible framework for an effective pre-K-12 education in Pennsylvania.⁴

It is also important to note that adopting the Pennsylvania Core Standards will not establish a common statewide curriculum. The regulations stress the importance of flexibility for local school entities to craft the curriculum and materials most appropriate for their students' unique needs.⁵ In fact, the regulations explicitly forbid mandating a statewide curriculum or reading lists.⁶

Additionally, the standards represent a state-level effort to ensure the best education possible for the students in our state. By adopting these revisions, Pennsylvania would join other states in customizing the standards to their unique needs. For example, in

http://edexcellencemedia.net/publications/2010/201007_state_education_standards_common_standards/Pennsylvania.pdf.

⁴ Crosswalks prepared by the Pennsylvania Department of Education comparing the PA Academic Standards, the Common Core State Standards and the new draft standards demonstrate numerous instances where the new standards were informed by and expand upon both the Common Core State Standards and the prior PA Academic Standards. For more information, see "Pennsylvania Common Core Standards Crosswalks," Pennsylvania Department of Education, accessed September 5, 2013.

<http://www.pdesas.org/standard/CommonCore>.

⁵ "Chapter 4 Final-Form (Proposed Revisions)," Pennsylvania Department of Education, accessed September 5, 2013.

http://www.portal.state.pa.us/portal/server.pt/community/current_initiatives/19720/chapter_4/1120975, page 6.

⁶ "Chapter 4 Final-Form (Proposed Revisions)," page 9.

Minnesota, only the standards for English-Language Arts were adopted, because the state was confident that its math standards were already sufficiently rigorous.

The standards are unique to Pennsylvania, and the proposed regulations also reflect Pennsylvania's decision to use its own state-created assessments. The proposed revisions clearly state that Pennsylvania "shall not be a governing state in any consortium for the development of a national assessment for the purpose of utilization as part of the state assessment system."⁷ From beginning to end, the standards and assessments reflect what both Pennsylvanians and national experts agree will produce the best outcomes for our students.

Private data will remain protected

Fortunately, the Pennsylvania Core Standards and related assessments can be adopted without breaching personal data privacy. To ensure that data privacy will remain protected, the regulations clearly state, "the [Pennsylvania Department of Education] shall not expand the collection of student data, and, in accordance with the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g (relating to family educational and privacy rights)), shall not collect personal family data due to the implementation of Pennsylvania Core Standards."

Conclusion

Continuing to delay the full implementation of high-quality rigorous standards will only ensure that too many Pennsylvania students continue to leave high school unprepared for the demands of succeeding in work or college. The Pennsylvania Core Standards and the related assessments are an appropriate, state-vetted solution that ensures all Pennsylvania children are receiving the education they need and deserve. PennCAN strongly supports the regulations and urge the IRRC to vote to approve them.

Sincerely,

Jonathan Cetel
Executive Director, PennCAN

PennCAN: The Pennsylvania Campaign for Achievement Now is a nonprofit education reform advocacy organization building a movement of Pennsylvanians with the political will to enact smart public policies so that every Pennsylvania child has access to a great public school. PennCAN is a branch of 50CAN: The 50-State Campaign for Achievement Now, a national network of state-level advocacy groups fighting to enact research-based education reforms that will give every child in their state access to a great school. In addition to Pennsylvania, 50CAN operates campaigns in Minnesota, Maryland, New Jersey, New York, North Carolina and Rhode Island.

⁷ "Chapter 4 Final-Form (Proposed Revisions)," page 42



Regulation 6-326: Pennsylvania Core Standards
Independent Regulatory Review Commission
November 21, 2013

Submitted by:
Ashley DeMauro
Pennsylvania State Director, StudentsFirst

We all know that Article III Section 14 of the Pennsylvania State Constitution requires that the state provide for the maintenance and support of a thorough and efficient system of public education.

In order to ensure that our educational system is held accountable for preparing students to be college and career ready – and in order to ensure that the investment we are making in our students is yielding results – Pennsylvania has a system of standards-based education to set a bar for our students and to ensure that they are meeting that bar.

But by the time Pennsylvania students graduate high school, many are not ready for college or the highly competitive global economy. This is due in no small part to weak academic standards that do not adequately prepare students. These standards allow students to graduate high school without the skills they need to be successful in the future.

This regulation makes crucial changes to these standards. It will implement the Pennsylvania-specific PA Core Standards, which took into account input from many Pennsylvanians, including educators. These standards include rigorous, 21st-century skills that will ensure that Pennsylvania students are prepared for life after their K-12 educational career.

When introducing new standards into the classroom, the system of accountability used to measure the effectiveness must also be updated. This regulation does this by containing important updates to aligned assessments, including Keystone Exams, which provide for a more accurate way to ensure students are proficient at the end of a course and ensure students have met the standards by the time they graduate. It will also reduce the number of Keystone Exams from ten to five, thus reducing testing time for students and cutting the number of subjects in which school districts are required to provide remediation and administer project-based assessments in half.

Pennsylvania's students are competing with students from across the country and around the world for college admissions and for jobs, and we know that many are not as prepared as they should be. The changes contained in the regulation before you will set a higher bar for students while also providing for a system of supports for both students and schools that will help them to meet that bar. For these reasons, I strongly support these changes and urge IRRC to vote to approve them.

Danielle Felger

Controlling Education From the Top

Why Common Core Is Bad for America

No. 87
May
2012

A Pioneer Institute and American Principles Project White Paper

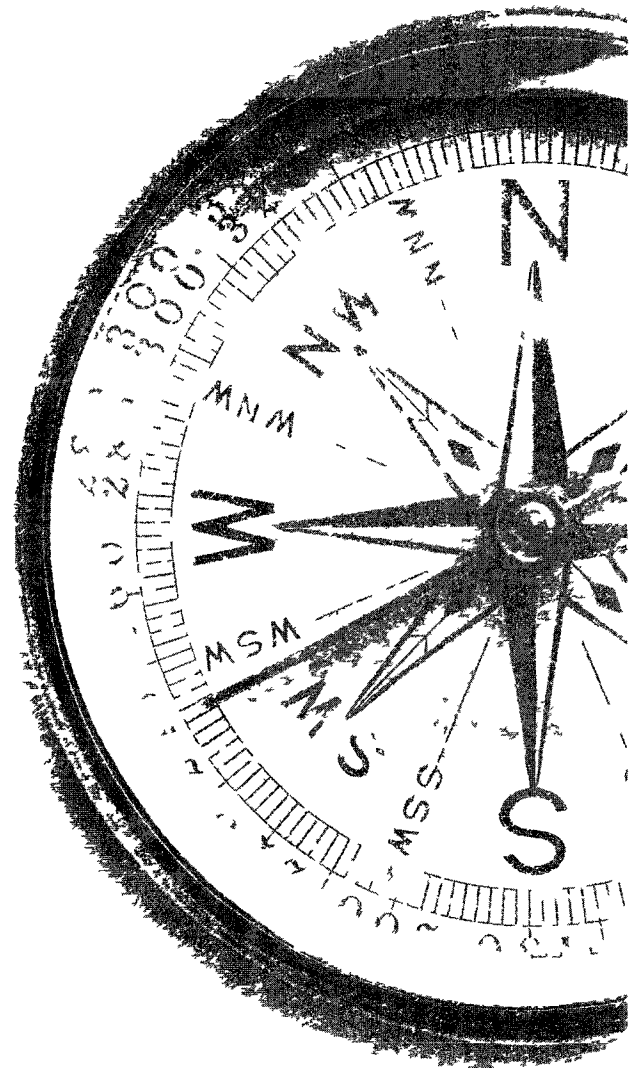
by Emmett McGroarty and Jane Robbins

PIONEER INSTITUTE
PUBLIC POLICY RESEARCH



PRI
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Improving lives through market solutions



American Principles Project's Mission


At the American Principles Project, we seek to preserve and propagate the fundamental principles on which our country was founded - to preserve those unalienable rights, set forth from the dawn of our republic, to life, liberty, and the pursuit of happiness. We seek to return our nation to these timeless principles - not because we long for an idyllic past but because we see them as critical to a successful future.


APP focuses on four core projects. Our Preserve Innocence Initiative is a multi-tiered effort to examine how government affects the upbringing of children, particularly through education and health policy. Our Latino Partnership for Conservative Principles works to promote conservative values within the Latino community and to integrate Latinos into fuller participation in the conservative movement. Our Economics Program is divided into two initiatives - the Fair Public Pensions Initiative, which works to educate Americans about the coming crisis in funding for public-employee pensions and to urge cutbacks that reflect fairness and economic reality; and our Gold Standard Initiative, which works to make a return to the gold standard a front-burner issue in 2012 and beyond.


Pioneer's Mission


Pioneer Institute is an independent, non-partisan, privately funded research organization that seeks to improve the quality of life in Massachusetts through civic discourse and intellectually rigorous, data-driven public policy solutions based on free market principles, individual liberty and responsibility, and the ideal of effective, limited and accountable government.

Pioneer's Centers

-  **This paper is a publication of the Center for School Reform**, which seeks to increase the education options available to parents and students, drive system-wide reform, and ensure accountability in public education. The Center's work builds on Pioneer's legacy as a recognized leader in the charter public school movement, and as a champion of greater academic rigor in Massachusetts' elementary and secondary schools. Current initiatives promote *choice and competition, school-based management, and enhanced academic performance in public schools*.

-  **The Center for Better Government** seeks limited, accountable government by promoting competitive delivery of public services, elimination of unnecessary regulation, and a focus on core government functions. Current initiatives promote *reform of how the state builds, manages, repairs and finances its transportation assets as well as public employee benefit reform*.

-  **The Center for Economic Opportunity** seeks to keep Massachusetts competitive by promoting a healthy business climate, transparent regulation, small business creation in urban areas and sound environmental and development policy. Current initiatives promote market reforms to *increase the supply of affordable housing, reduce the cost of doing business, and revitalize urban areas*.

-  **The Center for Health Care Solutions** seeks to refocus the Massachusetts conversation about health care costs away from government-imposed interventions, toward market-based reforms. Current initiatives include *driving public discourse on Medicaid; presenting a strong consumer perspective as the state considers a dramatic overhaul of the health care payment process; and supporting thoughtful tort reforms*.

Pioneer Institute is a tax-exempt 501(c)3 organization funded through the donations of individuals, foundations and businesses committed to the principles Pioneer espouses. To ensure its independence, Pioneer does not accept government grants.

Controlling Education From the Top

Why Common Core Is Bad for America

Emmett McGroarty

Jane Robbins

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■ **Controlling Education From the Top**

I. Issue Before the Board

The American Legislative Exchange Council's Public Sector Board of Directors must decide whether to uphold the Education Task Force's approval of the Comprehensive Legislative Package Opposing the Common Core State Standards Initiative. The Task Force's public-sector members approved the package on a 14-6 vote, and its private-sector members approved the package on an 8-4 vote. This legislation provides a model for legislatures to reclaim state responsibility for education decision-making –which has been gravely impaired as a result of the Common Core.

II. Executive Summary

The Common Core State Standards Initiative presents the following problems:

- 1. Manner of creation and propagation** – The national Common Core State Standards (the “Standards”) were not created by the states, but rather by private organizations in Washington, DC, with lavish funding from private entities such as the Gates Foundation. The federal Department of Education then used legally suspect means – the *Race to the Top* competition and the promise of waivers from No Child Left Behind – to impose the Standards on the states. This effort has been accompanied by a misleading campaign to present the Standards as “state-led” and “voluntary.”
- 2. Mediocre quality** – The Standards, which are intended to prepare students for nonselective community colleges rather than four-year universities, are inferior to those of some states and no better than those of many others. Common Core's English language arts standards consist of empty skill sets that, once implemented, might not require reading skills any higher than middle-school level. Furthermore, their de-emphasis of the study of classic literature in favor of “informational texts” would abandon the goal of truly educating students, focusing instead on training them for static jobs. Among the many deficiencies of the mathematics standards is their placement of algebra I in grade 9 rather than grade 8, thus ensuring that most students will not reach calculus in high school, and their mandate to teach geometry according to an experimental method never used successfully anywhere in the world. Contrary to previous claims by their creators, the Standards are not “internationally benchmarked.”
- 3. Illegal direction of curriculum and usurpation of state autonomy** – The point of standards and assessments is to drive curriculum. By imposing the Standards on the states, and by funding their aligned assessments and imposing those on the states as well, the U.S. Department of Education is violating three federal statutes prohibiting its direction, supervision, or control of curriculum. In addition, because states that adopt the Standards must accept them word for word and will have little opportunity to add content, the states must relinquish their autonomy over public education, all to the denigration of parents' rights.
- 4. Vague and unaccountable governance** – It is not clear what governance structure will be created in the future to address issues related to the Standards. What *is* clear is that the Standards are owned

and copyrighted by nongovernmental entities unaccountable to parents and students in individual states.

5. **Costs** – The only national study done of the potential costs of implementing the Standards and assessments estimates nationwide costs of almost \$16 billion over seven years. Continuing costs will be substantial, especially with respect to professional development and technology maintenance and upgrades.
6. **Threats to student and family privacy** – The federal Department of Education (the “Department”) is using the Standards and the assessments as vehicles to mandate the construction of massive state student databases. The Department has also gutted federal student-privacy law to allow greater sharing of student data with other government agencies and private entities. Partnering with the Department of Labor, the Department seeks to build a data system that allows tracking of individual students from preschool through the workforce. This vision not only creates substantial risks of privacy breach, but it also encompasses a worldview of the proper role of government that is greatly at odds with American founding principles.

For these reasons, the Public Sector Board of Directors should uphold the Education Task Force’s approval of the Comprehensive Legislative Package Opposing the Common Core State Standards Initiative.

III. Introduction

The issue before the ALEC Public Sector Board is whether to affirm the ALEC Task Force’s decision to pass the Comprehensive

Legislative Package Opposing the Common Core State Standards Initiative (the “Resolution”). The ALEC Board bears a heavy responsibility in considering this issue. The Common Core State Standards (the “Standards”) and the initiative for their nationwide adoption raise profound questions of federalism, education content, parental rights, governance, fiscal responsibility, and student and family privacy. As set forth below, this responsibility is of even greater consequence given that the people and their elected legislators had no opportunity to deliberate on the Standards and assessments before their adoption, and given that the Common Core system removes significant education policy decisions from the people and their elected representatives.

This matter involves two systemic dynamics. The first is that standards drive curriculum, programs of instruction, and the selection of instructional materials, and they do so even more powerfully when, as is the case with Common Core, they are tied to high-stakes assessments (standardized tests). The second is that the federal government and private organizations have pushed their Common Core agenda on the states by impairing state autonomy, and they plan to retain their stranglehold on the states.

Recognizing the gravity of this matter, Texas Governor Rick Perry warned that it would be “foolish and irresponsible to place our children’s future in the hands of unelected bureaucrats and special interest groups thousands of miles away in Washington, virtually eliminating parents’ participation in their children’s education.”¹ And in that regard, former Attorney General Ed Meese, former Assistant Secretary of Education Bill

■ **Controlling Education From the Top**

Evers, and hundreds of other professors and experts from a wide range of disciplines signed the *Closing the Door on Innovation* statement, arguing that:

[T]here is no constitutional or statutory basis for national standards, national assessments, or national curricula. . . . Even if the development of national curriculum models, frameworks, or guidelines were judged lawful, we do not believe Congress or the public supports having them developed by a self-selected group behind closed doors and with no public accountability.²

The Education Task Force first reviewed this matter at ALEC's 2011 summer meeting. At that time, several Task Force members noted their relative unfamiliarity with the issue (which is unsurprising given the unusual process, discussed below, by which the Standards were propagated); thus, the sponsors agreed to table the Resolution for further study at the winter meeting. At the winter meeting, the Education Task Force spent three days considering two panel discussions and a debate among national experts on the Standards. The Task Force's public-sector and private-sector members both passed the Resolution easily.

Since that meeting, the issue is increasingly attracting grassroots and media interest. The Common Core Initiative and the manner in which the Standards were imposed on the American people undermine our federalist system of divided powers. The Initiative reduces states, and the elected officials within the states, to administrative agents. And it denigrates parents' rights to direct the education of their children. This issue will not fade away.

IV. Background

Within a few short months in 2010, the vast majority of states committed to the Common Core and its attendant system of policy changes. As set forth below, the rapidity with which those commitments were made is not a reflection of high-quality standards, nor of fidelity to our founding principles. Rather, it was the product of the heavy hands of the federal government and private organizations.

If implemented, the Common Core Initiative will have a far-ranging impact on American education and state autonomy. A brief history will illuminate the breadth of that impact – and the reality that the Common Core idea arose not from the states, but from private organizations pursuing their own agenda. It will also shed light on why this matter is only now being addressed in the public square.

The story dates back decades, but its current phase can be traced to 2007. That year the Bill and Melinda Gates Foundation and the Eli Broad Foundation pledged \$60 million to inject their education vision, including uniform “American standards,” into the 2008 campaigns.³ In May 2008, the Gates Foundation awarded the Hunt Institute for Educational Leadership and Policy a \$2.2 million grant “to work with governors and other key stakeholders” to promote the adoption of national standards. The following month the Hunt Institute and the National Governors Association (NGA) hosted a symposium to explore education strategies.

That same year, NGA and the Council of Chief State School Officers (CCSSO), two Washington, DC-based trade organizations, began accepting foundation grants for purposes of starting the Common Core Initiative and propagating the Standards.⁴ In December 2008, to provide guidance to the

Obama Administration during its transition to the presidency, NGA, CCSSO, and their Washington, DC-based contractor, Achieve, Inc., set out their vision for the Common Core Standards in a document entitled *Benchmarking for Success*.⁵ This report, funded yet again by the Gates Foundation, outlines five reform steps:

1. Upgrade state standards by adopting a common core of internationally benchmarked standards in math and language arts.... To upgrade state standards, leaders will be able to leverage the Common Core State Standards Initiative, an upcoming joint project of NGA, CCSSO, Achieve, the Alliance for Excellent Education, and the James B. Hunt Institute for Educational Leadership and Policy.⁶
2. Leverage states' collective influence to ensure that textbooks, digital media, curricula, and assessments are aligned to internationally benchmarked standards and draw on lessons from high-performing nations and states.⁷
3. Revise state policies for recruiting, preparing, developing and supporting teachers and school leaders....⁸
4. Hold schools and systems accountable through monitoring, interventions, and support....⁹
5. Measure state-level education performance globally....¹⁰

Because NGA and CCSSO led its creation, the Common Core State Standards Initiative claims that it is a state-led effort, implying that it had legislative grants of authority from individual states. In fact, through 2008, the Common Core Initiative was a plan of private groups being implemented through trade

associations, albeit trade associations that had "official"-sounding names. Since 2007, NGA, CCSSO, and Achieve¹¹ accepted more than \$27 million from the Gates Foundation alone to advance the Standards and the connected data-collection and assessments.¹²

Throughout 2008-2009, the Standards had not been drafted. Yet the Common Core proponents wanted to quickly lock the states into the Standards and thus avoid, from their viewpoint, the difficulties inherent in the democratic process. Subjecting the Initiative to deliberation in all fifty states would take years; the people and their elected representatives would, for example, want to thoroughly review the Standards.

The American Recovery and Reinvestment Act, PL 111-5, enacted on February 17, 2009 (the "Stimulus Bill"), provided the breakthrough. It created a \$4.35 billion earmark for states "that have made significant progress" in meeting four education-reform objectives, including taking steps to improve state standards and enhancing the quality of academic assessments.¹³

The week following the Stimulus Bill's passage, in a C-Span interview, U.S. Secretary of Education Arne Duncan announced that the Department of Education (the "Department") would be distributing this Stimulus earmark to the states through a competitive grant program called *Race to the Top*. Through that process, the Department would identify a "set number of states" that would want to commit to very high common standards, "great assessments," and building "a great data system so that you can track those students throughout their academic career." When asked whether he envisioned "national standards for every kid across all subjects

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and national tests,” the Secretary replied, “We want to get into this game....There are great outside partners – Achieve, the Gates Foundation, others – who are providing great leadership....I want to be the one to help it come to fruition.”¹⁴

In March 7, 2009, one month after passage of the Stimulus Bill, the Department announced the *Race to the Top* “national competition” to distribute the Stimulus money through two rounds of grant awards.¹⁵

On June 1, 2009, NGA and CCSSO formally launched their Common Core Standards Initiative to develop and implement the Common Core – an effort implicitly referred to by Secretary Duncan several months before. They planned to “leverage states’ collective influence to ensure that textbooks, digital media, curricula, and assessments are aligned” with the Standards. At the time, CCSSO President-elect Sue Gendron, who is now policy adviser and coordinator for the SMARTER Balanced Assessment Consortium, described the initiative as “transforming education for every child.”¹⁶

However, in its *Race to the Top* request for applications, the Department **changed** Congress’s Stimulus Bill objectives from general improvement of state standards and assessments to acquiescence to specific federal dictates.¹⁷ These dictates included the following:

- (1) adopting internationally benchmarked standards and assessments that prepare students for success in college and the workplace;
- (2) building data systems that measure student success and inform teachers and principals about how they can improve their practices;

- (3) increasing teacher and principal effectiveness and achieving equity in their distribution; and
- (4) turning around the lowest-achieving schools.¹⁸

Notably, with respect to the “standards and assessments” objective, the *Race to the Top* restatement tracked the language of the NGA-CCSSO-Achieve *Benchmarking for Success* plan issued in December 2008.¹⁹ Furthermore, it designated the four reform objectives as “absolute priorities,” meaning that an applicant state had to address them to be considered for funding.²⁰

It is beyond dispute that the Department wanted all the states to adopt the Common Core Standards. Its *Race to the Top* request for state applications defined “internationally benchmarked standards” as a “common set of K-12 standards” that are “substantially identical across all States in a consortium.”²¹ It directed the competition judges to award a state “high” points “if the consortium includes a majority of the States in the country,” but “medium or low” points if the consortium includes one-half the states or fewer.²² The Department admitted that the “goal of common K-12 standards is to replace the existing patchwork of State standards” and that its view was “that the larger the number of States within a consortium, the greater the benefits and potential impact.”²³

In 2009, the Common Core State Standards Initiative was the only effort of its kind underway. By tracking the Common Core State Standards terminology in its grant requests for applications and by stating its intent to have one set of standards and one consortium, the Department discouraged other states from forming competing consortia.

The assessments (standardized tests) are an integral part of the Common Core system. Because assessments are meant, among other things, to measure what a student has learned, the Department wanted assessments that are aligned with the Common Core Standards. The assessments would serve not only as an evaluative tool, but also as an enforcement tool to ensure that a state is actually implementing standards. Here, the *Race to the Top* request for applications required that states, as one of the competition's "absolute priorities," participate "in a consortium of States that ...[i]s working toward jointly developing and implementing common, high-quality assessments (as defined in this notice) aligned with the consortium's common set of K-12 standards (as defined in this notice)...."²⁴

To this end, the Stimulus Bill also authorized \$362 million in funding "to consortia of states to develop assessments . . . and measure student achievement against standards."²⁵ The Department used that money to award a grant of \$169,990,272 (with a subsequent supplemental award of \$15,872,560) to the Partnership for Assessment of Readiness of College and Careers ("PARCC") consortium and a grant of \$159,976,843 (with a subsequent supplemental award of \$15,872,696) to the SMARTER Balanced Assessment Consortium ("SBAC").²⁶ Other funding for these consortia came from the Gates Foundation.²⁷

In addition to developing the assessments, both consortia, as Secretary Duncan has said, "will help their member states provide the tools and professional development needed to assist teachers' transitions to the new assessments." For PARCC, this includes "curriculum frameworks"²⁸ and "model instructional units."²⁹ Similarly, SBAC

is using the federal funding "to develop curriculum materials" and to create "a model curriculum" and "instructional materials" aligned with the Standards.³⁰ In *The Road to a National Curriculum*, Robert Eitel and Kent Talbert, the former deputy general counsel and general counsel, respectively, of the federal Department of Education, concluded that, "The assessment systems that PARCC and SBAC develop and leverage with federal funds, together with their hands-on assistance in implementing the [Standards] will direct large swaths of state K-12 curricula, programs of instruction and instructional materials, as well as heavily influence the remainder."³¹ Moreover, as discussed below in Section V(E), the Department clearly intends to maintain its involvement given that (1) it has required the consortia "to make student-level data that result from the assessment system available on an ongoing basis for research, including for prospective linking, validity, and program improvement studies" and (2) it has changed federal family and student privacy protections in order to do so.

But that is not all the Department did to impose its education policies on the states. The *Race to the Top* request for applications called on states, in competing against each other for a share of the \$4.35 billion, to demonstrate their commitment to the Department's system of policies **regardless of the competition outcome**. With respect to the Phase I competition, the request for applications required states to submit a plan "demonstrating [the state's] commitment to and **progress toward** adopting a common set of K-12 standards (as defined in this notice) by August 2, 2010. . . and to implementing the standards in a well-planned way." With respect to the Phase II competition, the request for applications required . states to have

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adopted “a common set of K-12 standards (as defined in this notice) by August 2, 2010” and to demonstrate their “commitment to implementing the standards thereafter in a meaningful way.”³² Because of the *Race to the Top* grant scoring rules, states could not win unless they committed to the Common Core Standards, which were the only ones in existence that met the description in the grant application.³³ States were thus in a competition to see which ones could firmly adopt the Department’s agenda before the two grant application due dates. The race was on.

But the Department wanted *carte blanche* commitments. To be competitive in the *Race to the Top* competition, states had to not only adopt the Standards and related assessments regardless of the competition outcome, but they had to do so without having an opportunity to evaluate the Standards and assessments. The federal timeline is revealing:

- The Department invited applications for Phase I on November 18, 2009, with a due date of **January 19, 2010**. Under this timeline, applicant states were required to demonstrate their commitment to the Common Core *without* having seen even a draft of the Standards.
- In a February 22, 2010 speech to NGA, President Obama made clear his intention that states would ultimately have to adopt Common Core to receive federal Title I education funding:

I also want to commend all of you for acting collectively through the National Governors’ Association to develop common academic standards that will better position

our students for success.... we’re calling for a redesigned Elementary and Secondary Education Act that better aligns the federal approach to your state-led efforts while offering you the support you need....First, **as a condition of receiving access to Title I funds**, we will ask all states to put in place a plan to adopt and certify standards that are college and career-ready in reading and math.³⁴

- In its March 2010 *A Blueprint for Reform*, the Department stated, “Beginning in 2015, **formula funds will be available only** to states that are implementing assessments based on college and career ready standards that are common to a significant number of states.”³⁵
- Also in March 2010, two months after states had submitted their Phase I *Race to the Top* applications – including their required commitments to the Standards – for the grants, NGA and CCSSO issued the draft Common Core Standards.
- On March 29, 2010, the Department announced the winners of Phase I (Delaware and Tennessee).
- The Department invited applications for Phase II on April 14, 2010 with a due date of **June 1, 2010**.
- Not until the day after that deadline, on June 2, 2010, did NGA issue the final K-12 Common Core Standards.
- The Department gave the Phase II applicants until **August 2, 2010** to amend their *Race to the Top* submissions in order to submit “evidence of having adopted common standards after June 1, 2010.”

- On August 24, 2010, the Department announced the Phase II winners (DC, FL, GA, HI, MD, MA, NY, NC, OH, and RI).

Thus, to be competitive for a share of the \$4.35 billion *Race to the Top* fund, Phase I applicants had to demonstrate a commitment to Common Core before even seeing a draft of the Standards. Phase II applicants had to adopt Common Core with, at most, two summer months to evaluate the Standards, compare them to their current standards, discuss the matter with their citizens, and commit to replace their standards with Common Core. It should be noted that the assessments – to which the states have been forced to commit – still have not been prepared.

The pressure exerted by the Department for the states to fall in line on Common Core was enormous. The Department dangled *Race to the Top* funding during a time of economic crisis, when forecasters were warning of impending economic cataclysm. And the Department demanded action immediately. Within days after passage of the Stimulus Bill, the Department outlined its *Race to the Top* plan, signaled its desire for national standards, and identified NGA as a “partner” in the project. It rushed into place a grants program (which exceeded congressional authorization) that (1) demanded immediate action by the states to enact the Administration’s policy changes; (2) required the states to commit to standards and assessments without an opportunity to study them, pilot them, or even discuss them with their legislators and citizens; and (3) deprived the states of the opportunity to study the fiscal impact. Regarding New Jersey’s June 16 adoption, Rutgers professor Joseph Rosenstein remarked to *Education Week*,

“Deciding so quickly, to me, is irresponsible. It was like it was a done deal, a foregone conclusion.”³⁶

But recession-racked states were desperate for cash, and the Department and the NGA-CCSSO public-relations operation employed appealing phrases such as a “state-led” effort and “internationally benchmarked standards and assessments.” Initially only Governor Palin of Alaska and Governor Perry of Texas refused to join the stampede. Governor Perry argued that it “smacks of a federal takeover of our public schools.” In May 2010, Virginia joined Texas and Alaska in opposing the takeover, with Virginia’s Governor McDonnell arguing that his state’s “standards are much superior” and the Common Core Standards had not been “validated.” Now, as more evidence has come to light and as citizens have an opportunity to delve into the matter, other states have begun to question the Common Core commitment decision.

V. Discussion

From the beginning, the Common Core State Standards Initiative has described the Standards in glowing terms. They are “state-led” and “voluntary.” They are “internationally benchmarked,” “robust,” “aligned with college and work expectations,” “rigorous,” and “evidence-based.”³⁷ They will enable meaningful comparisons of student performance across states.³⁸ We have already seen that the claims of state involvement and voluntariness are misleading at best. The discussion below demonstrates that the other claims are doubtful as well, and that any state evaluating the Standards in the cold light of day should consider the following problems: (1) quality and content of the Standards; (2) legality of the federal promotion of the Standards and assessments, and the

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usurpation of state autonomy; (3) governance of the Standards; (4) fiscal cost to the states; and (5) student and family privacy rights.

A. The Common Core Standards Are of Mediocre Quality and Rest on Questionable Philosophies

The Common Core Standards are of mediocre academic quality. Even Common Core proponents have conceded that the Standards are clearly inferior to those of several states and no better than those of about a dozen states.³⁹ More objective analysts have concluded that in both English language arts (ELA) and mathematics, the Common Core Standards are deficient. Moreover, both the ELA and the math standards rest on questionable philosophies.

i. *The Common Core English language arts standards are defective and would radically change literature instruction.*

Dr. Sandra Stotsky of the University of Arkansas, a member of Common Core's Validation Committee who refused to sign off on the Standards, criticizes the ELA standards as "empty skill sets . . . [that] weaken the basis of literary and cultural knowledge needed for authentic college coursework."⁴⁰ Common Core's focus on skill sets rather than true content is unlikely to genuinely educate students in English, reading, rhetoric, or composition.⁴¹

Nor do the ELA standards validate Common Core's boast of "college-readiness." Dr. Stotsky analyzed the high-school examples of "complexity" in Common Core and concluded that "the average reading level of the passages on the common tests now being developed to determine 'college-readiness' may be at about the grade 7 level."⁴²

Common Core's ELA standards (as well as the math standards) are designed to prepare students only for nonselective community colleges – which was in fact admitted by one of the Standards-writers when questioned by skeptical Standards-evaluators.⁴³ Because of this misleading definition of "college-readiness," Dr. Stotsky warns, colleges "will likely be under pressure from the [Department of Education] to retain these students so as to increase college graduation rates even if they are reading at only middle school level."⁴⁴

In addition to their technical deficiencies, the ELA Standards radically change the focus of instruction. They de-emphasize the study of classic literature in favor of reading so-called "informational texts," such as government documents, court opinions, and technical manuals.⁴⁵ In fact, the Standards dictate that well over half the reading curriculum, at least in grades 6 through 12, should consist of informational texts rather than classic literature. This will present difficulties for English teachers, the vast majority of whom have not been trained to teach such material (nor would most want to). And it is likely to diminish the communications skills students need to succeed in college and career.

Not only does Common Core limit the amount of literature that can be taught, but there are indications that it promotes the most intellectually disengaging techniques for presenting even the informational texts. One alarmed high-school English teacher, reporting on a Common Core training session that used the Gettysburg Address as an example, noted that teachers were instructed to adhere to a script, asking certain specific questions and avoiding others; to present the speech with no historical context but rather as "cold reading," as if Lincoln had delivered

the speech in a vacuum; and to read the speech aloud to the class not as Lincoln would have spoken it, with power and emotion, but rather without inflection. A past president of the National Council of Teachers of English declared herself “aghast at the vision of the dreariness and harshness of the classrooms [the standards-writers] attempt to create.”⁴⁷ Is this what our students and teachers have to look forward to in Common Core English classes?

But even more disturbing is that Common Core would deprive students of the intangible benefits of studying classic literature. A student who learns to love great books learns to understand great principles that endure throughout human history; to imagine himself in other times and other worlds; to understand different perspectives and points of view; to appreciate the history of his nation and others; and to love, and perhaps emulate, the well-crafted phrase, sentence, and paragraph. Most of these benefits cannot be obtained from reading informational texts. Common Core’s embrace of the latter at the expense of the former is a surrender to the idea that most students should be trained for static jobs, not developed as creative human beings who can fulfill their own potential and take their place in society as citizen leaders. Teaching students informational documents rather than classic literature may train them to be adequate entry-level workers for existing factory jobs, but it will not educate them to be thoughtful citizens and empower them in the exercise of their liberty.

University English professors are beginning to recognize and express concern about the educational philosophy represented by the Common Core ELA standards.⁴⁸ Dr. Anthony Esolen of Providence College, for example,

has urged one state legislature to reject Common Core’s attempts to diminish our children’s literary heritage:

[W]hat appalls me most about the [Common Core] standards . . . is the cavalier contempt for great works of human art and thought, in literary form. It is a sheer ignorance of the life of the imagination. We are not programming machines. We are teaching children. We are not producing functionaries, factory-like. We are to be forming the minds and hearts of men and women. . . . Frankly, I do not wish to be governed by people whose minds and hearts have been stunted by a strictly utilitarian miseducation. . . . Do not train them to become apparatchiks in a vast political and economic system, but raise them to be human beings, honoring what is good and right, cherishing what is beautiful, and pledging themselves to their families, their communities, their churches, and their country.⁴⁹

Sadly, the Common Core was pushed into the states without affording the people, or their elected representatives, an opportunity to discuss these issues.

ii. *The Common Core math standards are defective and in part rely on an unproven method of instruction.*

Common Core’s mathematics standards also fall short of the best we should offer our students. Mathematics Professor R. James Milgram of Stanford University, the only mathematician on the Validation Committee, concluded that the mathematics standards would put students two years behind those of many high-achieving countries, such as those in East Asia.⁵⁰ Dr. Milgram thus refused to sign off on the math standards. Curriculum

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expert Grant Wiggins described the math standards as “a bitter disappointment.”⁵¹

Dr. Milgram has identified several specific problems with the math standards. A significant concern is that Common Core places algebra I in grade 9 rather than grade 8. This means that the large majority of students will not reach calculus in high school, as expected by elite colleges.⁵²

Another problem is that geometry teachers will be instructed to teach their subject with an experimental method never used successfully anywhere in the world.⁵³ This method failed with math prodigies in the Soviet Union fifty years ago; what is the likelihood it will succeed with the average American student today?

The Common Core math standards contain other deficiencies: failure to teach prime factorization, and therefore failure to teach common denominators; postponing fluency with division from grade 5 to grade 6 (in contrast to high-performing countries such as Singapore and South Korea); failure to teach conversions between fractions, decimals, and percents; redefinition of algebra as “functional algebra” that de-emphasizes algebraic manipulation; and excluding some algebra II and geometry content that is a prerequisite at almost every four-year state college.⁵⁴ These deficiencies further demonstrate that the “college” referred to in Common Core’s boast of “college readiness” is a nonselective community college, not a four-year university.

iii. Contrary to the claims of their creators, the Common Core Standards are not internationally benchmarked

The creators of Common Core have long touted the Standards as “internationally benchmarked.” But Dr. Stotsky has noted that “[n]o material was ever provided to the Validation Committee or to the public on the specific college readiness expectations of other leading nations in mathematics or language and literature.”⁵⁵ Dr. Stotsky’s own research revealed that Finland and countries in the British Commonwealth have “far more demanding” requirements in language and literature.⁵⁶ Professor Milgram concluded that the Standards simply do not qualify as “comparable to the expectations of other leading nations.”⁵⁷ He explained: “In most high-performing countries, calculus is a high school graduation requirement. It’s almost a joke to think students [who master the common standards] would be ready for math at a university.” He added that at Stanford, calculus – largely precluded by the Common Core – is “considered remedial.”

Professor Jonathan Goodman of New York University criticized Common Core’s “significantly lower expectations with respect to algebra and geometry than the published standards of other countries.”⁵⁸ Professor Andrew Porter, dean of the University of Pennsylvania Graduate School of Education, found “surprising” results about the lack of international competitiveness of both the ELA and the math standards.⁵⁹

In light of these findings, the Common Core State Standards Initiative changed its description of the Standards from being “benchmarked” to the standards of high-performing countries (used in early press releases) to being “informed by” those of high-performing countries (in current form on the Common Core website).⁶⁰ Dr. Stotsky explained the need for the change:

“Benchmarking” means you use a set of agreed-upon criteria for judging something. To be “informed” by other countries’ standards means simply that they were read. Some other countries are light years ahead of what the common standards require for college readiness.⁶¹

iv. Contrary to the claims of its creators, the Common Core likely will not lead to genuine comparisons of academic achievement.

Although it is too early to evaluate the Common Core-aligned assessments currently being drafted by the two federally funded consortia, one point needs to be emphasized: The SBAC assessments, if implemented as planned, will **not** allow for genuine comparisons of academic achievement across states. This is because the assessments will be “computer-adaptive” – a student’s answers to the questions at the beginning of the test will determine what questions he is given later in the test.⁶² Thus, the test performance of Mary the fifth-grader in Baltimore cannot be meaningfully compared to that of Joey the fifth-grader in Topeka, because their test questions were probably different. This fact eliminates one of the primary arguments of the Common Core proponents – that we must be able to compare students across states.

If the states are going to lock themselves into a rigid scheme of standards and assessments that they cannot change, at least that scheme should be of exceptional quality and allow for genuine comparisons of achievement. That is not true of Common Core and the aligned assessments. States that wish to improve their own standards and assessments would be better advised to adopt those from the highest-achieving states, not problematic standards and assessments imposed on the

states by private organizations and the federal government.

B. The Common Core Standards/*Race to the Top* Effort Violates Three Federal Statutes and Eliminates State Autonomy

In imposing the Common Core Standards and aligned assessments on the States, the federal government is violating three statutes and has put America on the road to a national curriculum. With respect to the *Race to the Top*/Common Core scheme, Robert S. Eitel and Kent D. Talbert, former deputy general counsel and general counsel, respectively, of the U.S. Department of Education, concluded that “these standards and assessments will ultimately direct the course of elementary and secondary study in most states across the nation, running the risk that states will become little more than administrative agents for a nationalized K-12 program of instruction and raising a fundamental question about whether the Department is exceeding its statutory boundaries.”⁶³

Federal law lays down broad prohibitions on Department involvement in curricula decisions. The General Education Provisions Act prohibits the Department from “exercis[ing] any direction, supervision, or control over the curriculum, program of instruction, administration, or personnel” of any school, or “the selection of . . . textbooks, or other . . . instructional materials” used in any school.⁶⁴ Similar prohibitions exist in the Department of Education Organization Act⁶⁵ and the Elementary and Secondary Education Act of 1965 (ESEA).⁶⁶

Common Core is the vehicle by which the federal government is evading these prohibitions. As described above, the Department has herded the states into

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adopting Common Core by dangling before them *Race to the Top* funding while denying them the opportunity to review the Standards before signing on. As the Pioneer report notes:

Standards drive curriculum, programs of instruction, and the selection of instructional materials. A change to common K-12 standards will inevitably result in changes in curriculum, programs of instruction, and instructional materials to align with the standards. This is critical to understanding the importance of the road the Department has taken.⁶⁷

School districts understand that their curricula will have to change to align with Common Core; when polled, large majorities of districts in Common Core states agreed that the standards would require “new or substantially revised curriculum materials” in both math and English.⁶⁸ And even the Department acknowledges that the Standards will drive curriculum. In its *Notice of Final Priorities for the Race to the Top Fund*, the Department stated that “[s]ome of the major benefits of common standards will be . . . the coordination of information that could inform the development and implementation of curriculum, instructional resources, and professional development.”⁶⁹ By nationalizing the standards, the Department is nationalizing the curriculum. As Eitel and Talbert noted, the Department “has simply paid others to do that which it is forbidden to do.”⁷⁰

The assessments (standardized tests) that will be aligned with Common Core will also facilitate federal control over curricula. Again through *Race to the Top*, the Department has poured \$362 million into two consortia of states (PARCC and SBAC) that

are developing such assessments. Secretary Duncan is candid about what the consortia will do with that money: “PARCC . . . will be developing curriculum frameworks and ways to share great lesson plans. [SBAC] will develop instructional modules . . . to support teachers in understanding and using assessment results.”⁷¹ The consortia themselves agree that developing curricula and instructional modules is part of their mission.⁷² “The language used by both consortia in their supplemental funding materials,” Eitel and Talbert report, “leaves no question about their intentions to use federal funds to develop curricular and instructional materials” based on Common Core.⁷³ It is impossible to view this process as anything other than federal direction, supervision, or control of curricula – and therefore illegal under three federal statutes.

Another heavy-handed and legally suspect means by which the federal government is imposing the Common Core scheme on the states is the No Child Left Behind waivers. In September 2011, taking advantage of Congress’s delay in reauthorizing ESEA, the Department announced the Conditional NCLB Waiver Plan to exempt certain states from NCLB accountability requirements.⁷⁴ But in doing so, the Department went well beyond the congressionally authorized waiver provisions of ESEA,⁷⁵ and mandated additional requirements for states seeking a waiver. To qualify, a state had to agree to adopt “college- and career-ready standards” (either Common Core, or a set of standards certified by the state’s colleges and universities that is consistent with Common Core). The state also had to declare its membership in either PARCC or SBAC, or its intention to adopt those, or similar, assessments. In sum, to obtain an NCLB waiver, a state had to agree to

adopt common standards and assessments.⁷⁶ The waiver plan thus operates as another tool by which the Department coerces the states into accepting Common Core and the aligned assessments – and the curricula and programs of instruction being developed by the assessment consortia with federal money.

It is clear that the Department does not consider the statutory prohibitions on federal direction, supervision, or control of curriculum to be insurmountable obstacles to its goal of national control of public schools. The obstacles can be overcome by simply paying others to do what it cannot do, and by coercing the states into climbing on board. The best way to stop this scheme is for the individual states to refuse to participate. The more states that take this course, the less the federal leverage and control will be.

Even if the Department were acting within its legal authority in promoting Common Core, states should realize that, by acquiescing to the Department's desires, they are signing away their constitutional autonomy over the education of their children. And if the states no longer have control over education, neither can the parents in those states. Control will be centralized in the federal government and private organizations in Washington, DC.

The progressive view of education is that the education of children is too important to be left, as the Founders intended, to parents, localities, and the states. This view calls for sweeping national control of education, with the important decisions made by experts for the good of the citizenry. Common Core is the critical first step in accomplishing this vision.

The point of Common Core is to standardize K-12 education across the nation. This will

be accomplished by standardized courses, standardized textbooks and instructional materials, and standardized assessments. Such standardization, of course, cannot be accomplished if states are allowed to exercise autonomy in public-school education – to delete what they do not like from the Standards and substitute something they do. The Common Core initiative makes it clear that they cannot do so.

The *Race to the Top* application, the initial vehicle through which Common Core was imposed on the states, requires the applicants to adopt “a set of content standards . . . that are substantially identical across all States in a consortium.”⁷⁷ This means that states must adopt Common Core word for word. They may supplement the Standards, but only if the additional standards “do not exceed 15 percent of the State’s total standards for that content area.”⁷⁸ There is no provision allowing a state to subtract anything from the Common Core Standards.

Achieve warned that “states who adopt [the Common Core Standards] are expected to adopt them in their entirety.”⁷⁹ Achieve further discouraged the states from adding even the paltry 15 percent allowed under *Race to the Top*, noting that excessive state independence “would dilute the overall focus of the standards” and would threaten “the use of common assessments and instructional materials.”⁸⁰

The practical effect of this rigid standardization is that the Common Core states – and the parents and educators in those states – will lose all control over what the children are taught. If parents or math teachers find, for example, that Common Core’s experimental approach to the subject is no more successful here than it was with

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Soviet math prodigies, they will have no recourse to drive change through their state elected officials. In fact, no one in the state – not the state superintendent of education, not the governor, not the legislators – will have any power to change any objectionable Standard. All power will reside with the private organizations in Washington that control the Standards.

At best, a dissatisfied state would have to persuade anywhere from 23 to 44 other jurisdictions – and probably the federal Department of Education– to agree to revise the problematic Standards. The political obstacles alone would be daunting. It is utterly nonsensical for a state to trap itself in such a vise when, if it were free of Common Core, it could alter its own standards in whatever way best responds to the concerns of parents and educators. As South Carolina Governor Nikki Haley wrote, in support of Senator Mike Fair’s Common Core-withdrawal bill, “Just as we should not relinquish control of education to the Federal government, neither should we cede it to the consensus of other states.”⁸¹

C. The Common Core Standards Scheme Requires a Governance System that Will Further Impair State and Parental Rights

Looking ahead, the states face a difficult battle to prevent further erosion of their sovereignty and their abilities to guard the interests of their citizens. The Common Core Initiative, coupled with the federal effort to drive its adoption, has brought about national content standards owned by the private interests that created them – not by any state and not by the federal government.⁸² The result is that significant portions of the states’ educational systems now rest in the hands

of private organizations that an individual state cannot control. And, having stripped the people of effective political power and put it in the hands of private interests, the owners of the Standards attempt to insulate themselves from legal liability to the people with broad disclaimers for any damage the Standards might cause.⁸³

One particularly troubling aspect of the Initiative is that so much of its funding has come from private entities that are unaccountable to the taxpayers. The Gates Foundation, for example, has poured tens of millions of dollars into organizations that have an interest, financial or otherwise, in the implementation of Common Core. In particular, since 1999, the Gates Foundation has donated over \$30,000,000 to NGA⁸⁴ and \$70,000,000 to CCSSO.⁸⁵ In addition, it has financed a host of other organizations that work to influence education policy, including the National Education Association,⁸⁶ the American Federation of Teachers,⁸⁷ the American Association of School Administrators,⁸⁸ and WestEd (a federally created organization that serves as project manager for SBAC).⁸⁹ It has donated to organizations on both sides of the ideological spectrum, with significant funding to advance its education agenda going to conservative entities such as Fordham Institute⁹⁰; the American Enterprise Institute (over \$3 million since 2007, including a timely \$2 million grant in March 2009⁹¹ near the kick-offs of the Common Core Standards Initiative and *Race to the Top*); Jeb Bush’s Excellence in Education, a leading supporter of the Standards among Republicans⁹²; and in November of last year, a \$376,000 grant to ALEC while the Education Task Force was studying the Resolution before its December

2011 vote (as noted above, the Task Force resoundingly voted to pass the Resolution anyway).⁹³

This beneficence raises serious questions about who, exactly, is controlling education policy – elected officials answerable to the taxpayers, or unaccountable private groups? Commentators across the political spectrum have already expressed concern about whether elected officials are abdicating their responsibilities and letting wealthy donors run the show.⁹⁴ Nor can the nonprofit interests and for-profit interests be readily separated; for example, Microsoft recently invested in a division of Barnes and Noble that deals with curriculum,⁹⁵ and the Gates Foundation is working with the Pearson Foundation (connected to British educational mega-publisher Pearson PLC) to provide online courses.⁹⁶ The Gates Foundation has even paid NBC \$500,000 for the National Education Summit (broadcast on NBC and MSNBC).⁹⁷

All of this raises questions about how decisions will be made, who will make them, and how – if at all – states will be able to protect the interests of their citizens. Moving forward, decisions will have to be made regarding:

1. Researching, evaluating, and validating the Standards and the assessments. What entity will do this and determine, for example, whether a given set of results is a fair assessment of a particular state?
2. Updating and revising the Standards.
3. Ensuring that from state to state – states within a particular consortium and across both consortia – assessments are given within the same time frame so that no one state has the advantage of having

administered its assessments after other states.

4. Coordinating state academic calendars so that states do not suffer for having had less instructional time under their belts at the time of the assessments.
5. Coordinating and enforcing instructional time so that states do not “game the system” by de-emphasizing other subjects in order to out-perform on English language arts and math.
6. Coordinating and enforcing test preparations, in contrast to academic instruction, to ensure that students in all states are on equal footing.
7. Responding to parental concerns and complaints, especially with respect to issues of bias and testing philosophies.
8. Adding new subjects.

To begin the discussion of governance issues, the Fordham Institute set forth three possible models representing various levels of centralization: a “powerful” centralized entity (which it honestly calls “Let’s Become More Like France”); a small entity charged with updating the Standards but otherwise leaving issues to be addressed as they arise; and a middle ground that “features creation of an interim ‘coordinating council’ that might evolve into something more permanent (and ambitious) [note: parenthetical comment in the original text] over time.”⁹⁸

Regardless of the level of centralization, the fundamental problem remains that the extra-governmental existence of the Standards and the assessment consortia eviscerates a state’s ability to protect its interests and the interests of its citizens. For example, Fordham noted that even the most centralized governance structure would not clarify many federal

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policy issues, such as the intersection of ESEA funding-and-accountability expectations with Common Core standards and tests. Under such a system, Fordham further noted, “Standards, content, curriculum, teacher quality, instruction, and accountability are in danger of getting lost under controversial structural and political changes, interest group agonies, and the fresh risks of stasis, bureaucracy, and conventional thinking that accompany any new quasi-monopoly.”⁹⁹

But even a minimalist governance structure raises problems. Considerable amounts of money would still be needed for evaluation and validation of the Standards and assessments. Will that money come from the federal government, and if so, at what price of further federal domination? As Fordham noted, even private financing would be problematic:

The major foundations are so large and so powerful in using grants to pursue their strong policy agendas that independence, as a practical matter, may not be complete, even without government funding.¹⁰⁰

Nor does there appear to be a solution for internal governance within such a structure. Fordham suggests a ten- or twelve- member executive council that includes representatives from a variety of interests including NGA, CCSSO, the National Conference of State Legislators, the testing consortia, and the federal Department of Education. However, the proposal fails to provide for a single representative from any state.

The questions will continue. If a governance structure does include state representation, how will it balance the issues of the small and large states? By what margin will decisions have to pass? And how is it possible for any

governance structure to protect the interests of parents and students in individual states?

D. States and Their Taxpayers Will Incur Substantial Costs to Implement the Common Core

The novelty of the Common Core system is not in dispute, with its progenitors having proclaimed that the Standards are, as SBAC’s Policy Adviser and then-CCSSO President-elect Sue Gendron described them, “transforming education for every child.” Because the Standards will introduce pedagogical philosophies unfamiliar to most teachers, these teachers will have to be re-trained. Moreover, the Common Core assessment consortia will usher in novel tests that require substantial investments in technology infrastructure. The states and their taxpayers face significant increased costs in four areas: textbooks and instructional materials, professional development, assessments, and technology and infrastructure for the computerized assessments.

In a commissioned study, AccountabilityWorks estimated that the total additional costs (one-time costs plus seven-year implementation costs) to state taxpayers will amount to \$15.8 billion.¹⁰¹ That estimate includes the following new expenses for the states: \$1.2 billion for participation in the new assessments, \$5.3 billion for professional development, \$2.5 billion for textbooks and instructional materials, and \$6.9 billion for technology infrastructure and support. AccountabilityWorks further notes that the two testing consortia, especially SBAC, also face considerable technical challenges to accomplishing their goals and that, if those challenges are not overcome,

the costs will rise.¹⁰² Furthermore, states will incur additional costs if they exercise their right to add up to 15 percent to the Common Core Standards and want to test their students on that content.¹⁰³

Other than the due diligence attendant to the *Race to the Top* competition, few states have conducted a thorough analysis of what **all** their additional costs would be. However, a sense of the magnitude of the problem is evident by considering the limited state studies. For example, with respect to professional development, California has estimated the initial cost at \$2,000 per teacher.¹⁰⁵ It estimated its textbooks costs to be \$483 million, which AccountabilityWorks calculates to be \$77.19 per student.¹⁰⁶ And with respect to technological costs, as of January 2012, none of the states had conducted a rigorous feasibility study.¹⁰⁷

By their own admission, the states face fiscal strain from the implementation of Common Core. In a survey released in January 2012, the Center on Education Policy – a pro-Common Core group – reported that 30 states (all but two of those responding) admitted to difficulty in garnering adequate implementation resources. A substantial majority of the states admitted to major challenges with respect to implementing the online assessments and providing professional development. Such costs are not surprising given that an overwhelming number of the states admit that implementation will require new or substantially revised curriculum materials, fundamental changes in instruction, and more computers and enhanced technologies.

E. The Common Core Standards System Intrudes on Student and Family Privacy

A particularly troubling component of the Common Core Initiative is its connection to the collection and dissemination of personal student data. Analysis of this issue reveals how Common Core is merely one part of a much broader plan by the federal government to track individuals from birth through their participation in the workforce.

Progressive educators and bureaucrats, such as those currently in control in the Department of Education, have long advocated sweeping national control over education as a means of matching the citizenry to the workforce needs of industry. One prominent progressive reformist, Marc Tucker of the National Center on Education and the Economy, described this view in a now-famous letter to Hillary Clinton shortly after the 1992 election. Tucker promoted what is, to conservatives, a dystopia of authoritarian control: “remold[ing] of the entire American system for human resource development . . . – a seamless system of unending skill development that begins in the home with the very young and continues through school, postsecondary education and the workplace.”¹⁰⁸

An essential component of creating this “seamless system of unending skill development” is the construction of massive data systems, so that individuals can be tracked through school and beyond. But a federal statute prohibits the Department of Education from maintaining a national student database.¹⁰⁹ The Administration has discovered a way to evade this prohibition: Coerce the states into building the databases, and then change the law so the data can be shared.

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The Administration's 2009 Stimulus Bill created a State Fiscal Stabilization Fund, accessible only by states that agreed to build broad state longitudinal data systems (SLDS) to collect data on public-school students.¹¹⁰ To be eligible for Stimulus money, all fifty states agreed to build an SLDS. The *Race to the Top* competition then reinforced the SLDS requirement by granting extra points to states based on their SLDS commitments.¹¹¹ The Department intends these SLDS to "capture, analyze, and use student data from preschool to high school, college, and the workforce."¹¹²

What kinds of data might be included in the SLDS? According to the National Education Data Model,¹¹³ a myriad of information such as health-care history, disciplinary record, family income range, family voting status, and religious affiliation – over 400 data points in all.

Until recently, federal student-privacy law protected personally identifiable information (PII) from disclosure to outside entities. That changed, however, in January 2012, when the Department issued new regulations eviscerating the protections contained in the Family Educational Rights and Privacy Act (FERPA).¹¹⁴ The new regulations allow transmission of students' PII – without parental consent – to any governmental or private entity designated by the Department and others as an "authorized representative," for the purpose of evaluating an education program. Any PII the Department (or any other educational entity) acquires can now be shared with, for example, labor and public-health agencies. The student's parents would have no right to object; indeed, they would probably never know the disclosure had been made. These other agencies would then have access to a wealth of personal data.

The Department suggests there is nothing to worry about, at least with respect to the federal government, because the data it acquires from the state and local educational authorities are aggregate, not personally identifiable. But the assessment scheme aligned with Common Core is designed to change that. In exchange for federal funding of the PARCC and SBAC assessments, the cooperative agreements between the Department and those consortia explicitly require PARCC and SBAC to "develop a strategy to make **student-level data** that results from the assessment system available on an ongoing basis for research, including for prospective linking, validity, and program improvement studies; [*sic*] subject to applicable privacy laws."¹¹⁵

Many state education officials have noticed already a greater aggressiveness on the part of the Department in demanding personally identifiable student data, in conjunction with federal education grants. These demands go beyond assessing the effectiveness of funded programs; in fact, the Department claims the right to use the data – without parental permission – in future research projects. This is in keeping with various initiatives such as the recently announced joint venture between the Departments of Education and Labor, the stated purpose of which is to conduct more effective research and to better evaluate education and workforce training programs.¹¹⁶ The Department of Labor makes no bones about what these agencies are doing: "developing or improving state workforce longitudinal data systems with individual-level information [and] enabling workforce data to be matched with education data to create longitudinal data systems"¹¹⁷ With access to PII through the Common Core assessments, and with the new regulations

that gut FERPA, the primary “challenges”¹¹⁸ to this effort have been swept away.¹¹⁹

Common Core, then, is an essential component of a broader economic and workforce plan to track and analyze students. It is bad enough that all states are now building SLDS in return for Stimulus money; it will be far worse if they adopt national standards and assessments that open up their students’ private information to public and private entities throughout the nation.

VI. Conclusion

The story of the Common Core Standards has been one of disdain for the American people. The federal government and private organizations have imposed the Standards on the states. They have done so in a manner that denied the people and their elected legislators a meaningful chance to review the Standards and to consider the implications of participation in the Common Core Standards system, including assessments and data collection.

The federal constitutional structure – a compound republic with a separation of powers – serves to protect our liberties and governance by the people. The Common Core Standards Initiative and *Race to the Top* misused that structure by taking the people’s money and forcing their elected representatives to decide whether to compete for a chance to get that money back, and did so without respecting the states’ responsibility to put the issue to their people.

We are now coming to terms with some of the consequences of evading the constitutional structure. Those consequences include national Standards that – contrary to the creators’ claims of academic rigor – are

of inferior academic quality, that rest on a philosophy of education contrary to our founding, that undermine state autonomy and parental involvement, that intrude on student and family privacy, and that will impose enormous costs on state taxpayers.

The final chapter of this story, we believe, will be a rededication to the principle of government by the people. The American people are now awakening to the reality that their states have surrendered control to “experts,” who are delivering a product that falls profoundly short of its billing. State elected bodies now have the chance to reverse this. They have the chance to reassert the people’s right to self-determination. For the sake of our founding principles, they should do so.

EXHIBIT A
COMMON CORE ENGLISH
LANGUAGE ARTS STANDARDS
STATEMENT OF
DR. SANDRA STOTSKY

May 1, 2012

My professional background: I currently serve as Professor of Education Reform, 21st Century Chair in Teacher Quality, at the University of Arkansas. I draw on much state and national experience with K-12 standards, curricula, and assessments. I was the senior associate commissioner in the Massachusetts Department of Education from 1999-2003 where, among other duties, I was in charge of developing or revising all the state's K-12 standards. I reviewed all states' English language arts and reading standards for the Thomas B. Fordham Institute in 1997, 2000, and 2005. I co-authored Achieve's American Diploma Project high school exit test standards for English in 2004. I served on Common Core's Validation Committee from 2009-2010. Finally, I am the author of *The Death and Resurrection of a Coherent Literature Curriculum: What Secondary English Teachers Can Do*, to be published by Rowman & Littlefield in June 2012.

The Common Core English language arts (ELA) standards exhibit the following deficiencies:

- Common Core's "college-readiness" standards for ELA and reading are simply empty skill sets. They do not necessarily point to readiness for a high school diploma because we do not yet know the reading level of the passages to be used on tests based on these standards, or

where the cut scores will be set. To judge by the reading levels of the high school examples of "complexity" in Common Core's Appendix B, the average reading level of the passages on the common tests now being developed to determine "college-readiness" may be at about the grade 7 level.

- As empty skill sets, Common Core's college-readiness standards for ELA and reading cannot strengthen the high school curriculum, and they cannot reduce post-secondary remedial coursework in a legitimate way. Instead, they weaken the base of literary and cultural knowledge needed for authentic college coursework.
- As admitted by one of the creators of Common Core, Dr. Jason Zimba, at a meeting of the Massachusetts Board of Elementary and Secondary Education in March 2010, Common Core defines "college-readiness" as ready for a nonselective community college, not a four-year university.
- Because of this misleading definition of "college-readiness," colleges will likely be under pressure from the U.S. Department of Education to retain these students so as to increase college graduation rates, even if they are reading at only middle-school level.
- Common Core expects English teachers to spend over 50 percent of their reading instructional time on nonfiction and informational texts such as seminal U. S. political documents, court decisions, and scientific and technical manuals. This is not what English teachers are trained to do in any college English department or teacher-preparation program. They

take academic coursework in literary study (and in composition and rhetoric) and are trained to teach students how to read literary works (including speeches, biographies, and literary essays), not computer manuals or science textbooks.

- Common Core makes it impossible for English teachers to construct a coherent literature curriculum in grades 6-12, since most of the reading curriculum in those grades must address nonfiction and informational topics. Information about what? Will test developers select informational texts from science, history/social studies, and mathematics that English teachers have never been expected to teach?
- Because of these new expectations of English teachers, Common Core will entail drastic costs to change academic, preparation, and professional-development programs for prospective or current English teachers.
- Common Core's ELA standards badly misinform reading and English teachers on a number of disciplinary matters. Two examples of disciplinary ignorance:
 1. Informational reading standards do not clearly distinguish the modes of organizing an expository text (*e.g.*, order of time, cause and effect) from structural elements (*e.g.*, purpose, introduction, body, and conclusion).
 2. The strand on "argument" does not distinguish argument from expression of opinion, which is not a type of writing. Nor does Common Core distinguish academic argument from advocacy or persuasive writing or clarify key concepts at the root of

persuasive writing: purpose and audience.

- Because the organization of the reading standards is confusing, and a logical sequence difficult to discern, the Fordham Institute in its own review of Common Core's ELA standards concluded that "the standards do not ultimately provide sufficient clarity and detail to guide teachers and curriculum and assessment developers effectively."
- As Fordham concluded, "The reading standards for both literature and informational text fail to address the specific text types, genres, and sub-genres in a systematic intersection with the skills they target. . . . What's more, while some genres are mentioned occasionally in the standards, others, such as speeches, essays, and many forms of poetry, are rarely if ever mentioned by name. Similarly, many sub-genres, such as satires or epic poems, are never addressed. Many defining characteristics of the various genres are also rarely, if ever, mentioned Where literary elements are mentioned, their treatment is spotty. . . ."
- Common Core's writing standards fail to adequately scaffold skills from grade to grade or clearly delineate what students should be able to do without guidance or support from adults.

EXHIBIT B
STATEMENT OF
ZE'EV WURMAN
REGARDING COMMON CORE
MATHEMATICS STANDARDS

April 18, 2012

I, Ze'ev Wurman, summarize my professional and academic background as follows:

- A. I hold B.Sc. and M.Sc. degrees in Electrical Engineering from Technion, Israel Institute of Technology, in Haifa, Israel.
- B. I am currently Chief Software Architect for MonolithC3D and have 30 years of experience in developing algorithms, CAD software, and hardware and software architectures. I have published technical papers in professional and trade journals, and I hold seven U.S. patents.
- C. Between 2007 and 2009 I served as Senior Policy Adviser in the Office of Planning, Evaluation, and Policy Development in the U.S. Department of Education, during which time I supervised the Policy and Program Studies Services (PPSS) and advised the Assistant Secretary on K-12 education focusing on such issues as: assessment and accountability; English language learners; educational technology; student data systems; math and science instruction; and Asia-Pacific Economic Cooperation (APEC) Human Resource Development (Education) activities focused on math and science.
- D. I served on the 1997 California Mathematics Framework Committee,

the California STAR Mathematics Assessment Review Panel from 1998 to present, as a member of the California Instructional Material Adoption Panel in Mathematics in 1999 and 2005, and as a member of the Los Angeles Unified Mathematics Textbooks Adoption Committee in 2000.

- E. I was a member of the 2010 California Academic Content Standards Commission that evaluated the suitability of Common Core's standards for California, as well as a member of the Teaching Mathematics Advisory Panel to the California Commission on Teacher Credentialing.
- F. I organized the first US-China bilateral mathematics education experts meeting in 2008, and was a U.S. delegate to the 2008 APEC education symposium in Xi'an, China.
- G. I have published professional and opinion articles about education and about the Common Core in *Education Next*, *Education Week*, *Sacramento Bee*, *Boston Globe*, *San Francisco Chronicle*, and other publications.

I have thoroughly reviewed the Common Core Standards and have found that they fail to achieve their stated goal of improving U.S. K-12 mathematic achievement. Using sound mathematics teaching principles and comparison with strong, proven standards used by the highest performing states and by our international competitors as benchmarks, I have set forth below a description of the major Common Core deficiencies in mathematics:

- 1. Its abandonment of the expectation that students take Algebra I in grade 8. This expectation, based on the standard of

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

2. Related to the above-deficiency, a course of study aligned with the Common Core would provide students with poor preparation for taking Algebra in grade 8. Only private and elite schools will continue to provide sufficient preparation and, consequently, one should expect the proportion of students from challenging backgrounds taking Algebra by grade 8, or advanced mathematics in high school, to drop precipitously.
3. Common Core replaces the traditional foundations of Euclidean geometry with an experimental approach. This approach has never been successfully used in any sizable system; in fact, it failed even in the school for gifted and talented students in Moscow, where it was originally invented. Yet Common Core effectively imposes this experimental approach on the entire country, without any piloting.
4. Common Core excludes certain Algebra II and Geometry content that is currently a prerequisite at almost every four-year state college (see point 9 below). This effectively redefines “college-readiness”

to mean readiness for a nonselective community college, as a member of the Common Core writing team acknowledged in his testimony before the Massachusetts Board of Elementary and Secondary Education.

5. Common Core fails to teach prime factorization and consequently does not include teaching about least common denominators or greatest common factors.
6. Common Core fails to include conversions among fractions, decimals, and percents, identified as a key skill by the National Research Council, the National Council of Teachers of Mathematics, and the presidential National Advisory Mathematics Panel.
7. Common Core de-emphasizes algebraic manipulation, which is a prerequisite for advanced mathematics, and instead effectively redefines algebra as “functional algebra,” which does not prepare students for STEM careers.
8. More specifically, at the K-8 grade span:
 - 8.1 Common Core does not require proficiency with addition and subtraction until grade 4, a grade behind the expectations of the high-performing states and our international competitors.
 - 8.2 Common Core does not require proficiency with multiplication using the standard algorithm (step-by-step procedure for calculations) until grade 5, a grade behind the expectations of the high-performing states and our international competitors.
 - 8.3 Common Core does not require proficiency with division using the

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standard algorithm until grade 6, a grade behind the expectations of the high-performing states and our international competitors.

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

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

9. At the high school grades:

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

9.2 Common Core fails to address mathematical induction.

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

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

Common Core suffers from a number of systemic defects. It groups mathematics standards into “conceptual categories,” which provide a vague structure for high school courses and makes for difficult use by teachers and textbook publishers. It provides

verbose and imprecise guidance as to the level of fluency needed, omits basic skills such as factorization (reducing problems to the basic “building blocks” of the equation), and deemphasizes algebraic manipulation, leading to under-preparation for STEM disciplines. In terms of college readiness, its content is far below what is presently expected for college eligibility, which will create unreasonable expectations by parents and pressure on state universities to admit under-prepared students, with concomitant growth in remedial enrollment in college.

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

Ze’ev Wurman

About the Authors:

Emmett McGroarty is the Executive Director of the *Preserve Innocence Project* at the American Principles Project (APP). Mr. McGroarty is a frequent media guest, and his written works have appeared in publications such as *Townhall Magazine*, *The New York Post*, *The Washington Times*, and *Public Discourse*. He is a graduate of Fordham School of Law and Georgetown University.

Jane Robbins is a Senior Fellow at the American Principles Project. On behalf of APP, Ms. Robbins's work includes education policy, student privacy, and parental rights issues. She has drafted state legislation on educational transparency and sovereignty that has led to a parallel resolution by the South Carolina Southern Baptist Convention, model ALEC legislation, and emulated legislation in several states. She is a graduate of the Harvard Law School and Clemson University.

About American Principles Project:

The American Principles Project was founded to reinvigorate and restore the principles that made America great. APP takes pride in leading the conversation, defending and promoting the universal truths that all are "created equal, endowed by our Creator with certain unalienable rights, and among these are life, liberty, and the pursuit of happiness."

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Endnotes

1. Gov. Rick Perry, Office of Gov., Press Release (Jan. 13, 2010).
2. *Closing the Door on Innovation: Why One National Curriculum Is Bad for America. A Critical Response to the Shanker Institute Manifesto and the U.S. Department of Education's Initiative to Develop a National Curriculum and National Assessments Based on National Standards*, May 6, 2011, available at http://www.k12innovation.com/Manifesto/_V2_Home.html.
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<http://www.educationnews.org/articles/new-report-details-one-of-the-most-successful-independent-advocacy-initiatives-of-2008.html>
4. See “Bias Seen in Push to New Ed Standards,” *The Lowell Sun*, 7/18/2010. The Gates Foundation has forthrightly admitted that it “actively supported the Common Core Standards Initiative.” See *Fewer, Clearer, Higher: Moving Forward with Consistent, Rigorous Standards for All Students*, Bill & Melinda Gates Foundation, p.1 (2010).
5. *Benchmarking for Success*, by NGA, CCSSO, and Achieve, Inc., at p. 24, <http://www.achieve.org/files/BenchmarkingforSuccess.pdf> (last accessed 4/20/12). (Dec. 2008).
6. *Id.* at p. 24 (Dec. 2008).
7. *Id.* at p. 26.
8. *Id.* at 27.
9. *Id.* at 30.
10. *Id.* at 31.
11. Achieve attributes its founding to a “a bipartisan group of governors and corporate leaders” at the 1996 National Education Summit who decided to create and lead an organization dedicated to supporting standards-based education -reform efforts across the states. See <http://www.achieve.org/about-achieve>.
Achieve is led by a board of directors consisting of three sitting governors (Bill Haslam of Tennessee, Dave Heineman of Nebraska, and Deval Patrick of Massachusetts) and three corporate executives (Mark Grier, the vice chairman of Prudential Financial; Edward Rust, chairman & CEO of State Farm Insurance; and Jeff Wadsworth, the President & CEO of Battelle). Its board chair is Craig Barrett, the former CEO & Chairman of the Board of Intel, and its chairman emeritus is Louis V. Gerstner, Jr., the former Chairman & CEO of IBM Corporation. Achieve’s president is Michael Cohen, and its treasurer is Peter Sayre, the Controller of Prudential Financial, Inc. See <http://www.achieve.org/Board>.

12. <http://www.gatesfoundation.org/Grants-2011/Pages/Achieve-Inc-OPP1049781.aspx>;
<http://www.gatesfoundation.org/Grants-2011/Pages/Council-of-Chief-State-School-Officers-OPP1033998.aspx>;
<http://www.gatesfoundation.org/Grants-2011/Pages/Council-of-Chief-State-School-Officers-OPP1035090.aspx>;
<http://www.gatesfoundation.org/Grants-2009/Pages/Council-of-Chief-State-School-Officers-OPP50935.aspx>;
<http://www.gatesfoundation.org/Grants-2009/Pages/Council-of-Chief-State-School-Officers-OPPad12.aspx>;
<http://www.gatesfoundation.org/Grants-2011/Pages/National-Governors-Association-Center-For-Best-Practices-OPP1031294.aspx>;
<http://www.gatesfoundation.org/Grants-2008/Pages/National-Governors-Association-Center-for-Best-Practices-OPP50433.aspx>

Assuming, *arguendo*, that NGA and CCSSO had actual grants of authority from the states, then ethical questions would certainly arise from the private-sector funding.

13. American Recovery and Reinvestment Act, PL 111-5, Sec. 14005-06.

14. *News Makers*, C-SPAN, Feb. 22, 2009,
<http://38.105.88.161/Events/Education-Sec-Arne-Duncan-interviewed-by-Libby-Quaid-AP-and-Michele-McNeil-Education-Week/12961/>

15. See U.S. Dep't of Educ., Press Release (March 7, 2009).

16. See NGA press release (June 1, 2009).
http://www.nga.org/cms/home/news-room/news-releases/page_2009/col2-content/main-content-list/title_forty-nine-states-and-territories-join-common-core-standards-initiative.html (last accessed on April 23, 2012).

17. Grover Whitehurst of the Brookings Institution flagged the illegality of this change, noting that the combination of the Stimulus Bill and the America COMPETES Act allows funding only of state-standards development, not of national-standards development. See Grover J. Whitehurst, "Did Congress Authorize Race to the Top?", *Education Week*, April 27, 2010, available at http://www.edweek.org/ew/articles/2010/04/28/30whitehurst_cp.h29.html.

18. 74 Fed. Reg. 59,688 (Nov. 18, 2009) and 75 Fed. Reg. 19,496 (April 14, 2010). Compare with *Benchmarking for Success*, by NGA, CCSSO, and Achieve, Inc., at p. 24 (Dec. 2008).

19. 74 Fed. Reg. 59,688 (Nov. 18, 2009) and 75 Fed. Reg. 19,496, 19,498-99 (April 14, 2010). Compare with *Benchmarking for Success*, by NGA, CCSSO, and Achieve, Inc., at p. 24 (Dec. 2008).

20. See 74 Fed. Reg. 59,688, 59,838 (Nov. 18, 2009). See also 75 Fed. Reg. 19,496; *The Road to a National Curriculum*, *supra*, at n.53.

21. 74 Fed. Reg. 59,688, at 59,843. See Robert S. Eitel & Kent D. Talbert, *The Road to a National Curriculum*, Pioneer Institute, no. 81 at p. 8 and n.64 (Feb. 2012).

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22. 75 Fed. Reg. at 19,516 (April 14, 2010). See *The Road to a National Curriculum, supra*, at p. 8 and n.66.
23. 74 Fed. Reg. 59,688, at 59,733. See *The Road to a National Curriculum, supra*, at p. 10 and n.76.
24. 75 Fed. Reg. at 19,503.
25. 75 Fed. Reg. at 18,171 (Apr. 9, 2010).
26. See Cooperative Agreement Between the U.S. Department of Education and the Partnership for Assessment of Readiness of College and Careers (2011), available at <http://www2.ed.gov/programs/racetothetop-assessment/parcc-cooperative-agreement.pdf> and Cooperative Agreement Between the U.S. Department of Education and the SMARTER Balanced Assessment Consortium and the State of Washington (fiscal agent) (2011) available at <http://www2.ed.gov/programs/racetothetop-assessment/sbac-cooperative-agreement.pdf>. Illustrating the interconnectedness of all the interests that created Common Core, PARCC selected Achieve to “manage the consortia’s [sic] efforts to develop common assessments . . . ,” and hired three new directors who will actually work at Achieve rather than PARCC. To add to the confusion, one of these new directors hired by PARCC to work at Achieve already worked at Achieve. See Partnership for Assessment of Readiness for College and Careers, “Achieve Names Jeff Nellhaus, Director of PARCC Assessment, Doug Sovde, Director of PARCC Instructional Supports and Educator Engagement. & Karen Rosenthal, Director of Finance and Federal Reporting” (February 16, 2011), available at <http://www.achieve.org/achieve-names-three-directors>. The Gates Foundation has provided funding for Achieve, see <http://www.achieve.org/Contributors>; for PARCC and SBAC, see McGraw Hill Education, “Education Brief: The Common Core State Standards Initiative,” at p. 11 (February 2011), available at http://www.commoncoresolutions.com/PDF/education_brief.pdf; and for WestEd, a federally created (though no longer federally run) and federally funded group that serves as project manager for SBAC. See <http://www.wested.org/cs/wc/print/docs/wc/fund.htm>.
27. See *supra* n.26.
28. See Remarks of Secretary of Education Arne Duncan, *Beyond the Bubble Tests: The Next Generation of Assessments 4* (Sept. 2, 2010), <http://www.ed.gov/news/speeches/beyond-bubble-tests-next-generation-assessments-secretary-arne-duncans-remarks-state-1>.
29. PARCC Proposal for Supplemental *Race to the Top* Assessment Award (2010), <http://www.edweek.org/media/parccsupplementalproposal12-23achievfinal.pdf>.
30. See SMARTER Balanced Assessment Consortium, Supplemental Funding, Scope Overview Table 2-4 (2011), http://www.k12.wa.us/SMARTER/pubdocs/SBAC_Supplemental_Funds.pdf
31. Robert S. Eitel & Kent D. Talbert, *The Road to a National Curriculum*, Pioneer Institute, no. 81, p. 15 (Feb. 2012).
32. 74 Fed. Reg. 59,688 (Nov. 18, 2009) and 75 Fed. Reg. 19,496, at 19,516 (April 14, 2010).

33. With respect to the *Race to the Top* competition, the Department designated the reform agenda as “absolute priorities,” meaning that a state had to address them in order to be considered for funding. See Discussion, *supra*. That aside, even assuming an applicant state received perfect scores in all other categories, a state could not have scored higher than 415 if it rejected Common Core and related assessments – below the lowest-scoring *Race to the Top* winner, Ohio, which scored a 440.8.

34. <http://tpmlivewire.talkingpointsmemo.com/2010/02/obama-to-nga-americas-students-cannot-accept-second-place.php>

35. *ESEA Blueprint for Reform*, at pp. 11-12, U.S. Dep’t of Educ., Offc. of Planning, Evaluation and Policy Development, Washington, DC, 2010, available at <http://www2.ed.gov/policy/elsec/leg/blueprint>

36. Catherine Gewertz, *State Adoptions of Common Standards Steam Ahead*, *Education Week*, July 9, 2010 (online) and July 14, 2010 (print).

37. See <http://www.corestandards.org/about-the-standards>.

38. See <http://corestandards.org/in-the-states/georgia-adopts-common-core-state-standards/>.

39. Sheila Byrd Carmichael, W. Stephen Wilson, Kathleen Porter-Magee, & Gabrielle Martino, *The State of State Standards – and the Common Core – in 2010*, Thomas B. Fordham Institute, at pp. 6-8 (July 2010).

40. Statement of Dr. Sandra Stotsky Regarding Common Core English Language Arts Standards (“Stotsky Statement”), attached hereto as Exhibit A.

41. *Id.*

42. *Id.*

43. *Id.* See also Sandra Stotsky & Ze’ev Wurman, *Common Core’s Standards Still Don’t Make the Grade*, Pioneer Institute, no. 65, at p. 22 (July 2010); See Statement of Ze’ev Wurman Regarding Common Core Mathematics Standards (“Wurman Statement”), attached hereto as Exhibit B.

44. Stotsky Statement, attached hereto as Exhibit A.

45. *Id.* at p. 2; *Common Core Standards Still Don’t Make the Grade*, at p. 26.

46. Valerie Strauss, “One (Maddening) Day Working with the Common Core,” *The Washington Post* online (March 23, 2012), available at http://www.washingtonpost.com/blogs/answer-sheet/post/teacher-one-maddening-day-working-with-the-common-core/2012/03/15/gIQA8J4WUS_blog.html.

47. Joanne Yatvin, “A Flawed Approach to Reading in the Common-Core Standards.” *Education Week* online (February 27, 2012), available at <http://www.edweek.org/ew/articles/2012/02/29/22yatvin.h31.html>.

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48. See Mary Grabar, “The Gradgrinds of the Common Core,” *Roll Call* online (April 9, 2012), available at http://www.rollcall.com/issues/57_120/mary-grabar-gradgrinds-of-common-core-213672-1.html; Steven Lynn, *Top Ten Reasons Why Students Need More Literature (Not Less)*, Caffeinated Thoughts, Mar. 27, 2012, available at <http://caffeinatedthoughts.com/2012/03/top-ten-reasons-why-students-need-more-literature-not-less/>.
49. Letter from Anthony Michael Esolen to South Carolina House Committee on Education and Public Works (April 2012).
50. R. James Milgram’s email to Chris Minnich of CCSSO and the Validation Committee, May 30, 2010.
51. Grant Wiggins, *The Common Core Math Standards: They Don’t Add Up*, *Education Week*, Vol. 31, Issue 5, pp. 22–23 (Sept. 28, 2011).
52. Testimony of R. James Milgram to Texas Legislature on the CCSSI Core Standards and the New Draft Texas Math Standards (May 2011). See also *Common Core’s Standards Still Don’t Make the Grade*, at p. 20; Wurman Statement, attached hereto as Exhibit B, at ¶2. Common Core creator Achieve, Inc., has sought to deflect criticism on this point by producing an “appendix” suggesting an “accelerated path” for some students. But the “accelerated path” requires either tackling a bloated math curriculum in grade 7, or attending summer school – neither of which is a realistic alternative for most students. See Testimony of Ze’ev Wurman to South Carolina Senate K-12 Education Subcommittee (February 22, 2012).
53. Wurman Statement, attached hereto as Exhibit B, at ¶3. See also *Common Core’s Standards Still Don’t Make the Grade*, at p. 20; R. James Milgram & Sandra Stotsky, *Fair to Middling: A National Standards Progress Report*, Pioneer Institute, no. 56, at p. 20.
54. Wurman Statement, attached hereto as Exhibit B.
55. B.A. Birch, “Does Common Core Provide an International Benchmark?” *Education News* online (November 22, 2011), available at <http://www.educationnews.org/education-policy-and-politics/does-common-core-provide-an-international-benchmark/>. See also James Stergios, “Myths About National Standards: Myth # 1,” *The Boston Globe* online (November 16, 2011), available at http://boston.com/community/blogs/rock_the_schoolhouse/2011/11/myths_about_national_standards.html
56. Birch, *supra*. See also *Fair to Middling*, at p. 21.
57. Gewertz, Catherine: “Common-Core Standards Drew On Ideas From Abroad: Other Nations’ Curricula and Academic Standards Were Important Sources for Those Who Put Together the Learning Goals That Have Won Approval From Nearly All States,” *Edweek*, Jan. 12, 2012, available at <http://www.edweek.org/ew/articles/2012/01/12/16curriculum.h31.html?print=1> (last Accessed: April 24, 2012).

58. Stergios, *supra*.

59. *Id*

60. Craig D. Jerald, *Benchmarking for Success: Ensuring U.S. Students Receive a World Class Education*, National Governors Association, the Council of Chief State School Officers, and Achieve, Inc., Dec. 19, 2008), available at <http://www.achieve.org/files/BenchmarkingforSuccess.pdf> (last accessed Apr. 24, 2012).

This report originally set the goal of “benchmarking” national standards and assessments with the best-performing international competitors. The Common Core Initiative describes the project mission as creating standards “benchmarked to international standards.”

See <http://www.corestandards.org/frequently-asked-questions> (last accessed Apr. 24, 2012).

But the Initiative has now downgraded expectations by describing the final set of Standards as having been “informed by other top-performing countries.”

See <http://www.corestandards.org/articles/8-national-governors-association-and-state-education-chiefs-launch-common-state-academic-standards> (last accessed Apr. 24, 2012).

Apparently attempting to rationalize the change, the Initiative asserts that “[i]nternational benchmarking played a significant role in both sets of national standards.”

See <http://www.corestandards.org/about-the-standards/myths-vs-facts> (last accessed Apr. 24, 2012). It does not elaborate on the meaning of “significant role.”

61. “Common-Core Standards Drew On Ideas From Abroad,” *supra* n. 57.

62. <http://www.smarterbalanced.org/smarter-balanced-assessments/computer-adaptive-testing/>.

63. *The Road to a National Curriculum*, at p. 1.

64. 20 U.S.C. § 1232a.

65. 20 U.S.C § 3403(b).

66. 20 U.S.C § 7907(a).

67. *The Road to a National Curriculum*, at p. 9.

68. *Id*.

69. 74 Fed. Reg. 59,733 (November 18, 2009).

70. *The Road to a National Curriculum*, at p. 18.

71. See Remarks of Secretary of Education Arne Duncan delivered to State Leaders at Achieve’s American Diploma Project Leadership Team: *Beyond the Bubble Tests: The Next Generation of Assessments*, at p. 7 (Sept. 2, 2010), available at <http://www.achieve.org/keynote-address-us-secretary-education-arne-duncan>.

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72. See, e.g., PARCC Proposal for Supplemental *Race to the Top* Assessment Award, at pp. 1-5 (2010), available at <http://www.edweek.org/media/parccsupplementalproposal12-23achievefinal.pdf>; SMARTER Balanced Assessment Consortium, Supplemental Funding, Scope Overview Table, at pp. 2-4 (2011), available at http://www.smarterbalanced.org/wordpress/wp-content/uploads/2011/12/SBAC_Supplemental_Funds.pdf

73. *The Road to a National Curriculum*, at p. 15.

74. Dear Colleague Letter from Arne Duncan, Secretary, U.S. Department of Education, to the Chief State School Officers (September 23, 2011), available at <http://www2.ed.gov/policy/gen/guid/secletter/110923.html>.

75. 20 U.S.C. § 7861(b)(1).

76. U.S. DEP'T of EDUC., ESEA Flexibility Request, at pp. 9-10 (2011), available at <http://www.ed.gov/esea/flexibility>.

77. U.S. DEP'T of EDUC., *Race to the Top* Application, at p. 7 (Nov. 18, 2009), available at http://find.ed.gov/search?q=Race+to+the+Top+application+November+2009&client=default_frontend&output=xml_no_dtd&proxystylesheet=default_frontend&sa.x=0&sa.y=0&sa.

78. *Id.*

79. Achieve, Inc., “Adding to the Common Core State Standards: Addressing the ‘15%’ Guideline,” at p. 2 (Aug. 2010), available at <http://www.achieve.org/files/15PercentGuideline.pdf>.

80. *Id.*

81. Nikki Haley, Letter to Senator Mike Fair Supporting Common Core Withdrawal Legislation (February 15, 2012), available at <http://www.educationnews.org/education-policy-and-politics/sc-gov-nikki-haley-backs-bill-to-block-common-core-standards/>

82. <http://www.corestandards.org/public-license>:

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84. <http://www.gatesfoundation.org/Grants-2002/Pages/National-Governors-Association-Center-for-Best-Practices-OPP21661.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2002/Pages/National-Governors-Association-Center-for-Best-Practices-OPP24873.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2003/Pages/National-Governors-Association-Center-for-Best-Practices-OPP29522.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2004/Pages/National-Governors-Association-Center-for-Best-Practices-OPP35501.aspx> (last accessed May 1, 2012).
http://www.gatesfoundation.org/Grants-2004/Pages/National-Governors-Association-Center-for-Best-Practices-OPP35501_01.aspx (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2005/Pages/National-Governors-Association-Center-for-Best-Practices-OPP38008.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2005/Pages/National-Governors-Association-Center-for-Best-Practices-OPP40354.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2006/Pages/National-Governors-Association-Center-for-Best-Practices-OPP46399.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2008/Pages/National-Governors-Association-Center-for-Best-Practices-OPP50433.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2009/Pages/National-Governors-Association-Center-for-Best-Practices-OPPSI084.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2011/Pages/National-Governors-Association-Center-For-Best-Practices-OPP1031294.aspx> (last accessed May 1, 2012).

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<http://www.gatesfoundation.org/Grants-2012/Pages/National-Governors-Association-Center-For-Best-Practices-OPP1061444.aspx> (last accessed May 1, 2012).

85. <http://www.gatesfoundation.org/Grants-2002/Pages/Council-of-Chief-State-School-Officers-OPP21254.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2003/Pages/Council-of-Chief-State-School-Officers-OPP29031.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2004/Pages/Council-of-Chief-State-School-Officers-OPP30011.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2005/Pages/Council-of-Chief-State-School-Officers-OPP40158.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2007/Pages/Council-of-Chief-State-School-Officers-OPP46222.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2009/Pages/Council-of-Chief-State-School-Officers-OPP50935.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2009/Pages/Council-of-Chief-State-School-Officers-OPPAd12.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2010/Pages/Council-of-Chief-State-School-Officers-OPP1021697.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2011/Pages/Council-of-Chief-State-School-Officers-OPP1031455.aspx> (last accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2011/Pages/Council-of-Chief-State-School-Officers-OPP1035090.aspx> (last Accessed May 1, 2012).

<http://www.gatesfoundation.org/Grants-2011/Pages/Council-of-Chief-State-School-Officers-OPP1033998.aspx> (last accessed May 1, 2012).

86. <http://www.gatesfoundation.org/Grants-2009/Pages/The-NEA-Foundation-for-the-Improvement-of-Education-OPP1008864.aspx> (last accessed May 2, 2012);

<http://www.gatesfoundation.org/Grants-2010/Pages/The-NEA-Foundation-for-the-Improvement-of-Education-OPP1018138.aspx> (last accessed May 2, 2012).

87. <http://www.gatesfoundation.org/Grants-2009/Pages/American-Federation-Of-Teachers-Educational-Foundation-OPP52599.aspx> (last accessed May 2, 2012);

<http://www.gatesfoundation.org/Grants-2009/Pages/American-Federation-Of-Teachers-Educational-Foundation-OPP1003332.aspx> (last accessed May 2, 2012);

<http://www.gatesfoundation.org/Grants-2010/Pages/American-Federation-Of-Teachers-Educational-Foundation-OPP1016842.aspx> (last accessed May 2, 2012);

<http://www.gatesfoundation.org/Grants-2010/Pages/American-Federation-Of-Teachers-Educational-Foundation-OPP1015068.aspx> (last accessed May 2, 2012);

<http://www.gatesfoundation.org/Grants-2011/Pages/American-Federation-Of-Teachers-Educational-Foundation-OPP1031362.aspx> (last accessed May 2, 2012);

<http://www.gatesfoundation.org/Grants-2011/Pages/American-Federation-Of-Teachers-Educational-Foundation-OPP1033412.aspx> (last accessed May 2, 2012).

88. <http://www.gatesfoundation.org/Grants-2011/Pages/American-Association-of-School-Administrators-AASA-OPP1028242.aspx> (last accessed May 2, 2012);
<http://www.gatesfoundation.org/Grants-2011/Pages/American-Association-of-School-Administrators-AASA-OPP1038495.aspx> (last accessed May 2, 2012);
<http://www.aasa.org/content.aspx?id=19054> (last accessed May 2, 2012).
89. <http://www.gatesfoundation.org/Grants-2007/Pages/WestEd-OPP48931.aspx> (last accessed May 2, 2012);
<http://www.gatesfoundation.org/Grants-2010/Pages/WestEd-OPP1025332.aspx> (last accessed May 2, 2012);
<http://www.gatesfoundation.org/Grants-2011/Pages/WestEd-OPP1039523.aspx> (last accessed May 2, 2012);
<http://www.gatesfoundation.org/Grants-2011/Pages/WestEd-OPP1048644.aspx> (last accessed May 2, 2012).
90. <http://www.gatesfoundation.org/Grants-2003/Pages/Thomas-B-Fordham-Institute-OPP28659.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2005/Pages/Thomas-B-Fordham-Institute-OPP38936.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2005/Pages/Thomas-B-Fordham-Institute-OPP39086.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2006/Pages/Thomas-B-Fordham-Institute-OPP44393.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2008/Pages/Thomas-B-Fordham-Institute-OPP50819.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2009/Pages/Thomas-B-Fordham-Institute-OPP53347.aspx> (last accessed May 1, 2012).
<http://www.gatesfoundation.org/Grants-2009/Pages/Thomas-B-Fordham-Institute-OPP1005845.aspx> (last accessed May 1, 2012).
91. <http://www.gatesfoundation.org/Grants-2007/Pages/American-Enterprise-Institute-For-Public-Policy-Research-OPP49481.aspx> (\$500,000, 11/2007, “to provide original research and analysis to influence the national education debate and create a supportive policy environment for dynamic reform”);
<http://www.gatesfoundation.org/Grants-2009/Pages/American-Enterprise-Institute-For-Public-Policy-Research-OPP52995.aspx> (\$2,144,000 in March 2009 [at the time of the critical kick-off of *Race to the Top* and the Common Core Standards Initiative] “to support original research and analysis to influence the national education debates and create a supportive policy environment for dynamic reform”); and <http://www.gatesfoundation.org/Grants-2011/Pages/American-Enterprise-Institute-For-Public-Policy-Research-OPP1046903.aspx> (\$445,496 in 10/11 “to support original research and analysis to influence the national education debates and create a supportive policy environment for reform to improve the efficiency and productivity of higher education”).

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92. <http://www.gatesfoundation.org/Grants-2011/Pages/Foundation-for-Excellence-in-Education-Inc-OPP1044714.aspx> (last accessed May 1, 2012).

93. <http://www.gatesfoundation.org/Grants-2011/Pages/American-Legislative-Exchange-Council-OPP1044898.aspx> (the purpose of the grant was to “to educate and engage its membership on more efficient state budget approaches to drive greater student outcomes, as well as educate them on beneficial ways to recruit, retain, evaluate and compensate effective teaching based upon merit and achievement”).

94. See, e.g., Alan Singer, *Common Core, What Is It Good For?*, *The Huffington Post*, April 19, 2012. http://www.huffingtonpost.com/alan-singer/common-core-what-is-it-go_b_1434012.html (last Accessed May 1, 2012).

95. Sara Marley & James Callan, *Microsoft Investment Prompts Barnes and Noble Stock to Soar*, *Washington Post*, Apr. 30, 2012, http://www.washingtonpost.com/business/microsoft-investment-prompts-barnes-and-noble-stock-to-soar/2012/04/30/gIQAfW41rT_story.html (last accessed May 1, 2012).

96. Sam Dillon, *Foundations to Offer Online Courses for School*, *New York Times*, Apr. 27, 2011. <http://www.nytimes.com/2011/04/28/education/28gates.html> (last accessed May 1, 2012).

97. <http://www.gatesfoundation.org/Grants-2010/Pages/NBC-Universal-Inc-OPP1023373.aspx> (last accessed May 2, 2012).

98. Chester E. Finn, Jr. & Michael J. Petrilli, *Now What?: Imperatives & Options for “Common Core” Implementation & Governance*, Fordham Institute, Oct 2010, available at <http://www.edexcellence.net/publications/now-what-imperatives-and.html>.

99. *Id.* at 13.

100. *Id.* at 14.

101. AccountabilityWorks, *National Cost of Aligning States and Localities to the Common Core Standards*, Pioneer Institute and American Principles Project, Feb. 2012.

102. *Id.* at pp. 3, 9-12 (AccountabilityWorks assumes that the testing consortia will be able to refine technologies to score constructive response questions [e.g., short-answer questions as opposed to multiple-choice questions] for use in large-scale high-stakes testing).

103. *Id.* at 7.

104. *Id.* at 7.

105. *Id.* at 15, citing T. Torlakson, *Initial Estimate of Federal Waiver Fiscal Impact*, attachment 6, p.2, California Dept’t of Educ.

106. *Id.* at 18. By comparison, a study of Florida’s textbook and materials costs arrived at a significantly higher estimate because it included, in addition to just textbooks, consumables,

manipulatives, and other instructional materials. *Id.* at 20, citing *Instructional Materials Cost Analysis for Fiscal Year 2011-12*, Florida Assoc. of Dist. Instructional Materials Administrators, August 2010, available at <http://fadima.net/pdf/CostAnalysis2011-12.pdf>.

107. *Id.* at 12.

108. Letter of Marc S. Tucker to Hillary Clinton (November 11, 1992), available at http://www.eagleforum.org/educate/marc_tucker/.

109. 20 U.S.C. § 7911.

110. Pub. Law 111-5 (2009). See also America COMPETES Act, 20 U.S.C. § 9871.

111. U.S. DEPT. OF EDUCATION, *Race to the Top* Application for Initial Funding, at pp. 29-32 (Nov. 18, 2009), available at http://find.ed.gov/search?q=Race+to+the+Top+application+November+2009&client=default_frontend&output=xml_no_dtd&proxystylesheet=default_frontend&sa.x=13&sa.y=7&sa=.

112. State Longitudinal Data Systems, U.S. DEP'T OF EDUC. (July 2009), available at <http://www2.ed.gov/programs/slds/factsheet.html>.

113. NATIONAL CENTER FOR EDUCATION STATISTICS, National Education Data Model, available at <http://nces.sifinfo.org/datamodel/ciebrowser/techview.aspx?instance=studentElementarySecondary>.

114. 76 Fed. Reg. 75604 (Dec. 2, 2011), available at <http://www.gpo.gov/fdsys/pkg/FR-2011-12-02/pdf/2011-30683.pdf>.

115. Cooperative Agreement Between the U.S. Department of Education and the Partnership for Assessment of Readiness for College and Careers, at p.3 (emphasis added), available at <http://www2.ed.gov/programs/racetothetop-assessment/parce-cooperative-agreement.pdf>; Cooperative Agreement Between the U.S. Department of Education and the SMARTER Balanced Assessment Consortium and the State of Washington (Fiscal Agent), at p.3 (emphasis added), Jan. 7, 2011, available at <http://www2.ed.gov/programs/racetothetop-assessment/sbac-cooperative-agreement.pdf>.

116. "U.S. Department of Labor announces more than \$12 million in grants available to states to improve workforce data quality" (Feb. 21, 2012), available at <http://www.dol.gov/opa/media/press/eta/eta20120352.htm>.

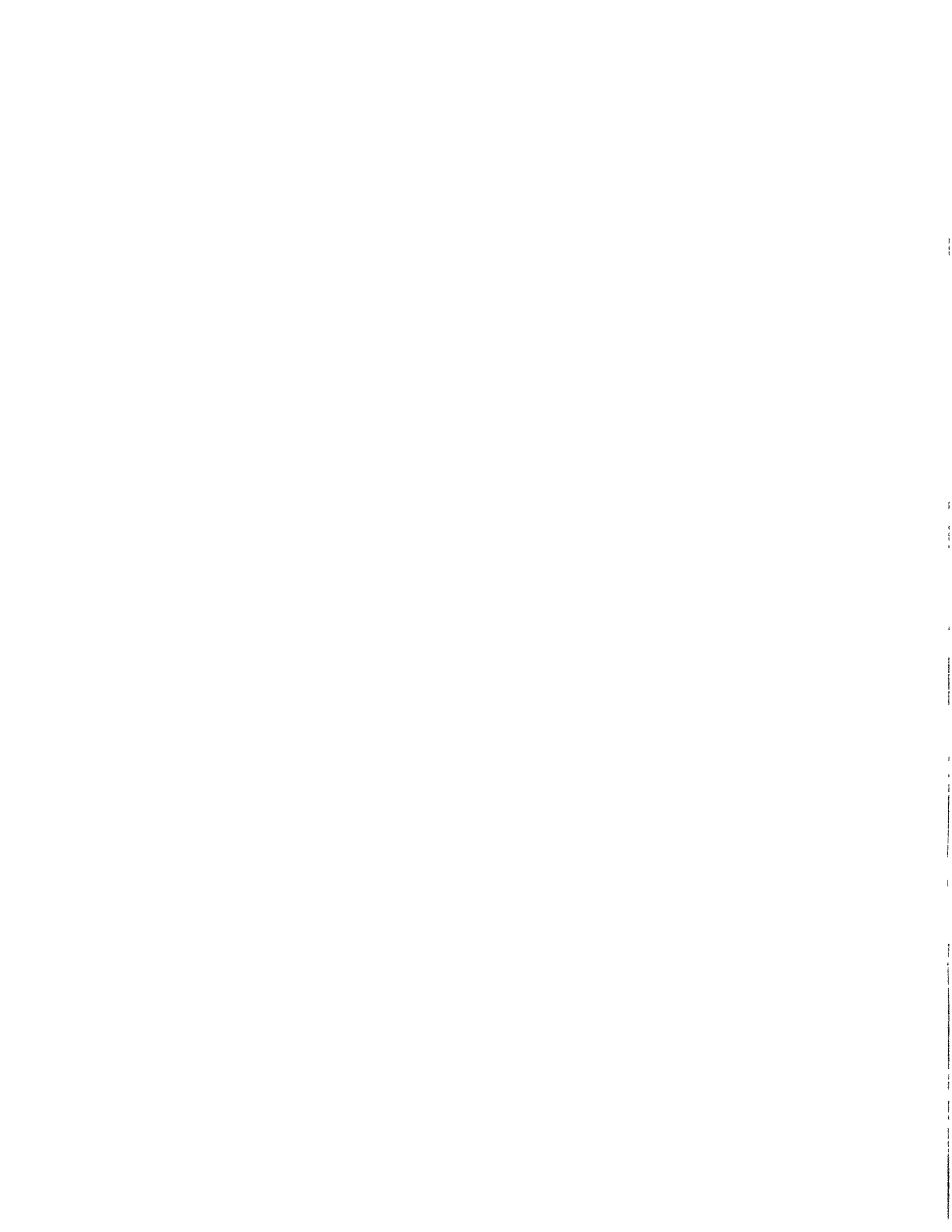
117. *Id.*

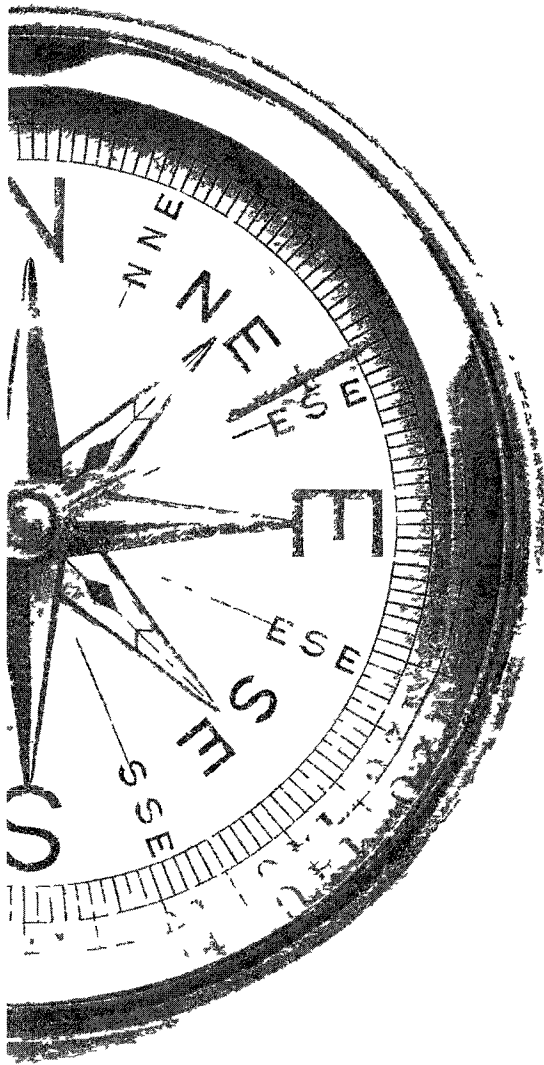
118. Characterization made in a PowerPoint presentation at the *2011 National Conference for Adult Education State Directors (May 11, 2011): Workforce Data Quality Initiative*, U.S. Dep't of Labor, available at <http://conference.novaresearch.com/2011aesd/presentations/Tues/Lincoln/WDQI%20overview%20presentation%20Adult%20Ed%20May%202011.pdf>, slide 10.

■ **Controlling Education From the Top**

119. An indication of what the future may hold with regard to student-data sharing is evident in a new effort called the “Shared Learning Collaborative” (SLC), a multi-state alliance funded by, of course, the Gates Foundation. SLC’s stated purpose is to help implement the Common Core Standards by “allow[ing] states and districts to integrate student data that currently exist in different source systems . . . and make it available to content and applications from many providers” SLC envisions “a multitenant data store designed to allow state [sic] and districts to upload a student’s full history of achievement, enrollment and other data” SLC also plans to create “learning maps” connected to Common Core so that individual students’ progress will be “dynamically tracked through the maps.” Shared Learning Collaborative. “Fact Sheet” at p.1 (April 5, 2012), available at <http://www.slcedu.org/sites/default/files/downloads/SLC-Fact-Sheet.pdf>.

It is not clear from SLC’s vague self-descriptions who will have access to this student data. But given that SLC-generated technology will track students as they transfer from school to school, and link to the perhaps less-secure websites of online courses the students may take, see Brian Proffitt, *Open Source Maps A New Education Future* (Mar. 7, 2012), available at <http://www.itworld.com/it-managementstrategy/256562/open-source-maps-new-education-future>, the warning signs for data privacy are ominous.





Ms. Carolyn Bulitta
764 Hunt Club Lane
Chester Springs, PA 19425

November 21, 2013

IRRC
401 North Street
North Office Building, Hearing Room 1
Harrisburg, PA 17101

Good After noon,

Today you are voting on the PA DOE Chapter 4 regulations. Let's be honest what this all boils down to is power, greed and control. How does that fit into the equation of education? What message does this send to our children?

I know you have been hearing from a lot of White Suburban Mother's who think their child is the best and go to the best schools. How dare they, who do they think they are? Let me tell you who we are and what we stand for

They are preparing America's future. They get up everyday at the crack of dawn and get their children up, make them breakfast, prepare their lunches and see them off at the bus stop everyday!

They are Moms, Dads and Grandparents of all races and religions.

We send our children to school to acquire the skills and knowledge they need to achieve their dreams. They seek hope for a better future for their children and grandchildren.

To decide which road Pennsylvania will take. You must first decide which side you stand on? There is no middle of the road. When Pennsylvania signed on to Common Core they agreed to accept the national standards and the national tests that come with it. We cannot have one without the other.

Pennsylvania's Core Standards have not been vetted such as the Common Core Standards were. Reputable Professors such as Dr. Stotsky, English professor at the University of Arkansas and Dr. Milgram, Math professor at Stanford University, both on the validating committee refused to sign off on the Common Core Standards.

Your decision today will be one of two choices. I will lay them out before you:

The proponents they say:

Special Interests
It Takes a Village
Group Think
Central Control
Public Comment
What is this about: Standards
Fairness
Assessments
Achievement Tests
Let's be real Chicanery
Spin
Complexity
Didactic
Elitism
Coercion
Surveillance
Bullying
Vulgarity
Ideology
Covert
Authoritarianism
Indoctrination
Oligarchy
So does One Size Fits All?
Career Ready

The opponents they say:

Interests of our Children
It Takes a Family
Individual Creativity
Local Control
Public Debate
vs. Excellences
vs. Merit
vs. Learning
vs. Mastery
vs. Debate
vs. Truth
vs. Common Sense
vs. Realization
vs. Independent Thought
vs. Choice
vs. Privacy
vs. Acceptance
vs. Decency
vs. Knowledge
vs. Overt
vs. Individual Freedom
vs. Education
vs. Republic
Or can we be Individuals?
vs. Life Ready

Common
The Core does not breed

vs Exceptional
Diversity and Creativity at all!

It breeds frustration, mental exhaustion, and stress not only for the students for their parents and grandparents as well.

This is the line. Which side do you stand on? Do you serve the people of the Commonwealth or do you serve special interest? Do you promote an ideology vs workability. Please vote against approving the Chapter 4 Regulations.

Thank you, Carolyn Bulitta

Testimony offered by

Richard Felice
609 Bedrock Road
Coatesville, PA 19320

Reference: IRRRC Number 2976, date 21 November 2013

Thank you Commission Members and Good Morning:

My testimony addresses school board activism and a solution to reform education.

SCHOOL BOARD ACTIVISM:

I submit to the commission a November 2013 resolution, unanimously passed by the Coatesville Area School District opposing PA Core Standards.

Paraphrasing our Superintendent's words - we need more GOOD teachers! Instead, we see the onset of more bureaucracy, increasing paperwork, more cost (yet undefined) to the taxpayers and procedurally how to implement student remediation.

Teachers, parents and residents of Coatesville have expressed their dislike with implementing either PA Core or federal Common Core due to loss of local control, increased testing emphasis and all phases of student/family data collection. Coatesville embraces the District's concerns and support their proactive position in passing the resolution to oppose PA Core Standards.

SOLUTION TO REFORM EDUCATION:

When speaking to interest groups about Common Core I am often asked; what is the alternative to what educators recommend? My answer is quite simply this:

My generation is the product of education without Common Core or its derivative or significant government intrusion. I attended public schools from the late 1940's through 1962. I am a college graduate with engineering degrees. My generation and preceding generations contributed to the legacy of our country and the world. MOST everything that surrounds us today had its birth prior to 1980 through research, development, design and production. I refer to industrial and medical technologies, consumer goods and appliances, electronics, communications, computers and media, to name a few. These industries and technologies were embraced by those who had dreams and ambitions to expand their creativity. All this without Common Core or its derivative.

The cost per student for my generation's education ... far less than today's cost or projected costs with Common Core. We were taught by teachers who inspired students and made attending school interesting rather than facilitators who will broadcast lesson plans to a predetermined script. We graduated free thinkers with unbounded limits. Common Core components will graduate widgets and robots constrained in thought, bound by agenda, and compliant to the status quo.

If the Department of Education seeks to improve student performance and raise our national standing among all industrial nations, why did they not consider the proven success of the educational model of generations ago?

**The Coatesville Area School District
Coatesville, PA 19320**

Resolution Opposing Pennsylvania Common Core State Standards Initiative

November 2013

Whereas, a solid education of children is the responsibility of the parents, supported by the locally elected Board of School Directors of the Coatesville Area School District based on a strong foundation of accountability and transparency, that is built by open communication about the policies, programs, curriculum and the funding of these education processes; and,

Whereas, the Common Core State Standards (CCSS) Initiative is an unproven experimental set of national standards lacking empirical data to support them, that are still in the early stages of development, and local school board members, school leaders, teachers and most importantly parents were not included in the discussion, evaluation and preparation of the Common Core; and,

Whereas, through a collaboration between two non-governmental organizations, National Governors Association and the Council of Chief State School Officers, both of which are Washington D.C. based associations with zero grant of legislative authority from states to draft national standards; and,

Whereas, the Common Core State Standard Initiative binds us to an established copyright over standards, from which we cannot delete, replace or add beyond an additional 15% even if parents, teachers, and the local school board all agree, ignoring academic freedom, teacher autonomy, stifling creativity and innovation, eliminating a laboratory environment & best practices; and,

Whereas, the General Educational Provisions Act prohibits federal authority over curriculum and testing; however, in the view of some, the U.S. Department of Education's Cooperative Agreement potentially implies Common Core's test-building and data collection is federally managed; and,

Whereas, Common Core State Standards Initiative incentivized states to adopt the standards, even before they were written, and tied financial incentives to "Race to the Top" such that if States did not adopt the Common Core Standards, they faced penalties and loss of funds; and,

Whereas, the federal government is imposing an unfunded mandate on our state for unproven Pennsylvania Common Core instruction, training, and testing platforms without any pledge of financial support from federal, state or local government; and,

Whereas, neither the Pennsylvania Secretary of Education nor the Governor of Pennsylvania are authorized by the Pennsylvania State Constitution to change public education

standards and curricula without prior passage of legislation in the Pennsylvania General Assembly whose mandated responsibility in Article III, Section 14 is “to provide for the maintenance and support of a thorough and efficient system of public education to serve the needs of the Commonwealth” but which has delegated degrees of that responsibility to the State Board of Education to which the Governor of Pennsylvania has appointing authority and of which the Secretary of Education serves as Chief Executive Officer; and,

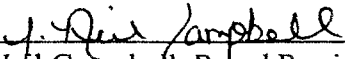
Whereas, the CCSS requires collection and sharing of massive amounts of personal student and teacher data creating a risk of privacy breach;

NOW, THEREFORE be it:

RESOLVED, that the Coatesville Area School District does not subscribe to a one size fits all top down approach to education and recognizes that CCSS is an inappropriate overreach of untested, experimental education standards that are not developed from results based evidence on their efficacy nor on demonstrated best practices;

RESOLVED, that the Coatesville Area School District rejects the collection of personal student data for any non-educational purpose without the prior written consent of a parent; and

RESOLVED, That the Board of School Directors of the Coatesville Area School District hereby officially advises the State Board of Education, the Pennsylvania Secretary of Education, the Governor of Pennsylvania, the Senate and House of Representatives' Education Committees and the Independent Regulatory Review Commission that it opposes the Pennsylvania Common Core Standard Initiative.



J. Neil Campbell, Board President

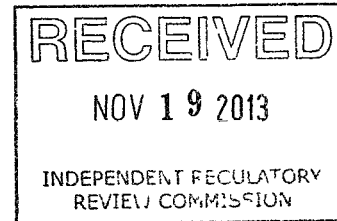


Ronald G. Kabonick, Board Secretary

2976

November 18, 2013

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



Subject: a.) Resolution, Coatesville Area School District, Coatesville PA OPPOSES
PA Core Standards (see Addendum)
b.) Alternative to PA Core Standards

Reference: IRRRC #2976

Dear Mr. Sumner;

Allow me to present a resolution which was unanimously passed on 12 November 2013 by the Coatesville Area School District opposing PA Core Standards.

After months reviewing the proposed PA Core and federal Common Core Standards, the board and school's Superintendent decided to formerly oppose PA Core Standards. Many of the teachers and parents, along with area residents, I have spoken with have expressed their concerns with implementing either set of standards due to, among other issues, the increasing amount of paperwork, a blotted educational bureaucracy and a continuing loss of local control.

Paraphrasing our Superintendent's words - we need more GOOD teachers! But, instead, we see the onset of more bureaucracy, increasing paperwork, more cost (yet undefined) and procedurally how to implement student remediation.

We as the concerned citizens of Coatesville, share both the board and Superintendent's concerns and support their proactive position in passing the resolution to oppose PA Core Standards.

When speaking to community residents and interest groups about Common Core I am often asked, being against Common Core, what is your alternative to what educator's and/or the state board authority recommends? My answer is quite simple this:

My generation is the product of public education without Common Core Standards or its derivative or significant government intrusion. I attended public schools from the late 1940's through 1962. I am a college graduate with multiple engineering degrees and have worked in the private aerospace and defense industries for over 45 years. What has my generation and those of preceding generations contributed to the legacy of our country? The specifics are too numerous to state in this venue but MOST everything that surrounds us today had its birth prior to 1980 in form of research, development,

Mr. David Sumner
November 18, 2013
Page 2

design and production. I am referencing industrial and medical technologies, consumer goods and appliances, electronics, communications, computers and media, to name a few. These industries and technologies were embraced by those men and women who had dreams and ambitions and a purpose to expand their creativity. All this without Common Core or its derivative. The cost per student for my generation's education ... far less expensive than today's cost or projected costs with Common Core. We were taught by teachers who inspired and made attending school interesting rather than facilitators who will broadcast lesson plans to a predetermined script. We graduated free thinkers with unbounded limits. Common Core and its derivative will graduate widgets and robots constrained in thought, bound by agenda, and compliant to status quo.

If the PA Department of Education seeks to improve student performance and raise our national standing among the industrial countries of the world, why did they not consider the proven success of the educational model of a generation ago?

Respectfully,

A handwritten signature in black ink that reads "Richard A. Felice". The signature is written in a cursive, slightly slanted style.

Richard A. Felice
Coatesville, PA



Pennsylvania Business Council

116 Pine Street, Suite 201
Harrisburg, Pennsylvania 17101
717-232-8700 www.pabusinesscouncil.org

Public Comments
David W. Patti, President & CEO
Pennsylvania Business Council
Independent Regulatory Review Commission
November 21, 2013

Good morning. My name is David W. Patti. I serve as the president and CEO of Pennsylvania Business Council – a business organization that represents among its membership the largest employers in the Commonwealth.

I also have the honor of serving on the Executive Committee of the Pennsylvania Workforce Investment Board, a post to which I was appointed by Governor Corbett. I served on the PAWIB during the Rendell Administration as well.

The Pennsylvania Business Council strongly supports the Chapter 4 regulatory package before the Independent Regulatory Review Commission. The proposed academic standards were an outstanding improvement in their first form in 2010, but they are even better today. The input of lawmakers, the public and interest groups and the deliberation of the State Board of Education have brought appropriate scrutiny and debate to these important topics. The Pennsylvania Business Council believes the final product is stronger for this debate.

The career and college ready standards that formed the original model for the Pennsylvania Core Standards were created through the combined efforts of many parties including governors, state education secretaries and commissioners, business leaders, academics, think tanks, associations, foundations, and public school educators. These actions taken over several years and through many meetings began during the Bush Administration and were wholly propelled by state government leaders, business groups, and non-profits; not by the Federal government. To date, more than 40 states and the District of Columbia have adopted some form of the standards.

Business leaders nationwide are strong supporters of rigorous academic standards and aligned statewide assessments (exams) that assure us our young people are proficient in key learning areas and our education dollars are spent wisely achieving high performance.

I want to share some of the findings from research conducted by our affiliated PBC Education Foundation. In the spring of 2009, PBCEF conducted non-partisan survey research into the views and perceptions of Pennsylvania business owners and managers regarding the job readiness of young people.

Four hundred Pennsylvania businesspersons – owners, presidents and very senior managers – were interviewed by telephone. Industries represented in the interviews included Construction, Retail Trade, Services, Agriculture, Mining, Manufacturing, Transportation, Wholesale, and Finance. The interviewees were proportionately representative of Pennsylvania’s population centers.

The survey research found:

- Only seven percent (7%) of interviewees were “very confident” that high school students are graduating with the necessary knowledge and skills to perform well in the workplace.
- Only fourteen percent (14%) of interviewees thought the quality of Pennsylvania’s workforce had improved in recent years. Half thought it had stayed the same and 33 percent thought it had gotten worse.
- Fifty-six percent (56 %) of interviewees were “somewhat concerned” or “very concerned” about their ability to hire qualified candidates for their companies.
- Only fifty-three percent (53%) of interviewees thought “a high school diploma is a good indicator of a candidate's competency, basic skills, and knowledge.”
- Eighty percent (80%) of interviewees were “strongly” or “somewhat” supportive of “new guidelines that would require high school students to meet certain statewide requirements to prove they are proficient in basic skills by passing a series of common final exams in reading, math, science, writing, and social studies in order to graduate.”

Of course, there are very few jobs available today for persons with only a high school diploma. In fact, we estimate that only about one-quarter of jobs in Pennsylvania’s economy are available to persons with a high school education or less. In order to successfully win and hold one of these jobs, an individual with a high school diploma seeking employment must truly be proficient in English language skills including reading, writing and listening; and in basic algebra skills.

About one-quarter of Pennsylvania career opportunities require a four-year college education or even more (advanced degrees, professional degrees). More than ever, it is critical that Pennsylvania’s young people who hope to have a strong career with a potential for high earnings, must be college ready. And, with the extraordinary cost of higher education and the alarming amount college debt being shouldered by students and their families, it is essential that college-bound students are already proficient in the basics and not in need of costly remediation before commencing their studies.

About half of the jobs in Pennsylvania – and the world – do not require a four-year college degree, but do require significant and meaningful post-secondary education and training. This includes two-year associate’s degrees, technical training, apprenticeships, skills development that might continue from high school in a 2+2 program, or military training.

These jobs – once known as “skilled labor” but increasingly thought of as “gold collar,” “technicians,” or “para-professionals” – are well paying, family sustaining occupations with long-term career options and trajectories. But our young people must be prepared for this

education and training. The technical manuals required for these studies are more complex than many college textbooks. The writing and listening skills required to share technical information between shifts, workteams, and operating units – sometimes across international borders – are mission critical. The required math skills are irreplaceable.

Today employers, union apprenticeship programs, and the US military are unable to find qualified applicants for their training programs because graduating students are simply not proficient in core competencies.

Business leaders support common core as the best way to ensure a future workforce available anywhere in the United States able to compete on a global scale.

The opinion of business leaders is important, but I thought you might be just as interested in knowing what the voters of Pennsylvania think. In the summer of 2012, PBCEF contracted with well-known Washington, DC pollsters The Tarrance Group who conducted on our behalf a 20 minute telephone interview with 600 registered Pennsylvania voters. Among the results:

- Asked to give a letter grade to public education in Pennsylvania, only 32 percent of respondents assigned an “A” or a “B” while nearly two-thirds, 64 percent, gave Pennsylvania public education grades of “C,” “D,” or “F.”
- Nearly half of all survey respondents – 48 percent – believed public education in Pennsylvania has gotten worse over the past 10 years.
- Eighty percent (80%) of voters surveyed said that “recent graduates of PA’s public schools are [only] ‘somewhat,’ or ‘not at all’ prepared to get and succeed in a job right out of high school.”
- Eighty-three percent (83%) of Pennsylvania voters surveyed believed that the students should be educated to the same standards in every part of the state.
- Eighty-four percent (84%) of Pennsylvania voters surveyed believed that a more rigorous public school curriculum would better prepare students.
- Seventy percent (70%) of Pennsylvania voters surveyed supported having every student pass a common exam of core material.

In recent months, there has suddenly been new opposition to Common Core that I would largely characterize as "political" - dealing more with perceptions, personalities, and the role of government than with issues of educational quality. Many of the issues raised during the recent debate, while not unimportant, are not actual Common Core issues, but ancillary topics. And some of the criticisms leveled against a national model just don't apply to Pennsylvania's own customized standards.

In August 2012 and again in August 2013 after the full national barrage of anti-Common Core activism, we asked a very specific question:

As you may be aware, a Common Core State Standard has been adopted in Pennsylvania. This standard defines what all Pennsylvania students should know in each grade, testing students on a yearly basis, and holding schools accountable for results. Do you support or oppose Common Core State Standards defining the curriculum for all students here in Pennsylvania?

	<u>August 2012</u>	<u>August 2013</u>
Support	68%	52%
Unsure/Did Not Respond	11%	22%
Oppose	21%	26%

The negative messaging and activism contributed to a small erosion of support, but support remains at 2:1 over opposition.

Rigorous academic standards with aligned assessments that seek to ensure student mastery of core subjects are essential to making our students truly ready for careers and post-secondary education. A well-educated and prepared population is absolutely necessary to grow Pennsylvania's talented workforce and absolutely necessary to make Pennsylvania a competitive environment for economic growth and prosperity.

We strongly urge approval of this regulation. Thank you.

Testimony – IRRC – November 21, 2013

I am a white suburban mom, grand mom, and retired university lecturer in chemistry who today will present several well-founded reasons why I oppose Common Core.

1. There is **no empirical evidence** that this costly, untested initiative will improve learning outcomes.
2. The **federal control** involved in Common Core will lessen or eliminate the influence of parents and local school boards on our educational system. The Chapter 4 regulations state *who* must approve the Keystones as our assessment tool. Words therein -- **“Upon approval by the United States Department of Education”** -- indicate quite clearly that it is the ***Feds*** who are in control.
3. **Common Core embraces collectivism and marginalizes individualism.** It is a breeding ground for methodologies that focus on a “one-size-fits-all” paradigm that is the educational analog of “spreading the wealth.” Common Core’s excessive use of collaboration not only impedes brighter students from reaching their maximum potential, but can cause frustration in slower students.
4. The amount of **time spent preparing for, and administering assessments is excessive** and leaves too little time for teachers to provide unique and interesting supplemental modules that establish a love of learning in their students. ***So much energy goes into compliance that little remains to pursue excellence.***
5. **Costs for implementation will be prohibitive, resulting in massive unfunded mandates** at a time when Pennsylvania is facing severe budgetary problems, including an exponentially expanding pension crisis.

These concerns are just a tip of the iceberg, but unfortunately we have a three minute time limit.

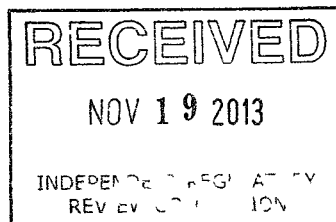
So what is the answer? Apparently, if the IRRC rejects the new Chapter 4 regulations (*which are bad*), Pennsylvania will revert to the 2010 regulations (*which are worse*). It’s like deciding whether to ingest arsenic or cyanide! It is reprehensible and inexcusable that the Pennsylvania Department of Education, an ***unelected committee***, subverted the democratic process by completely bypassing our state legislature and omitting public hearings before making this momentous decision that will not only impose insurmountable fiscal burdens on our citizens but also totally transform our educational system. They should be brought to task for their autocratic, irresponsible and stealthy actions, but that’s a story for another day.

Common Core could very well produce as much chaos in our educational system as Obamacare has in our health care system. The only solution is for our State Legislature to pass legislation that refuses to provide funds for the implementation of Common Core. We can only hope they have the courage to act to prevent the ruinous fiscal and educational consequences that will almost certainly ensue if Common Core is not stopped.

Joanne Yurchak; 1397 Springton Lane, West Chester, PA
yurchak@science.widener.edu; 610-431-2809

Cooper, Kathy

From: Joanne Yurchak <jyurchak@comcast.net> #16
Sent: Tuesday, November 19, 2013 12:04 AM
To: David Sumner
Subject: Please use this version. The one I previously sent had an error in the first paragraph.
Reference IRRC #2976: Common Core
Attachments: Testimonial to IRRC Regarding Methodology pdf



Dear Mr. Sumner:

Attached is a pdf file of a testimony to the IRRC that I would like published on line. Please use this version. I corrected an error in the one I sent previously. I would prefer that it be published as is, with the formatting in tact, but if this is not possible, I am also including the text below. Thank you.

Joanne Yurchak

November 18, 2013
Mr. David Sumner
Executive Director, IRRC
333 MarketStreet, 14thFloor
Harrisburg,PA17101

Reference: IRRC #2976

Dear Mr. Sumner:

Although I have serious concerns about a multitude of deleterious consequences of the Common Core initiative, this testimony focuses on certain of its "teaching" methodologies that I consider to be educationally counterproductive. My perspective is that of a retired educator who taught chemistry at the university level for decades.

My two grandsons are both taking Algebra I at the Paxon Hollow Middle School in the Marple Newtown School District in Delaware County. One is in sixth grade and one in eighth. Paxon Hollow uses a Common-Core-associated technique called "Power Teaching" that is designed to move from a teacher-centered classroom to a student-centered classroom with the use of cooperative learning. My grandsons have explained to me that in each of their classes, the teacher functions as a "facilitator," presenting a topic to the class for about 10-15 minutes. For the remainder of the class period, students are given problems to solve among themselves in groups. Unfinished problems are taken home for help from their parents which in itself is problematic since they have no books—only worksheets.

How can educators who devise these educational experiments delude themselves into believing that they will improve understanding and learning outcomes? A collaborative methodology of this sort will frustrate slower students and prevent the brighter ones from reaching their maximum potentials. In the opinion of this educator, algebra classes should be homogeneously grouped and taught by a trained

teacher. It should be **obvious** that having children “teaching” children the complex abstract concepts involved in algebra is not only educationally unsound but irresponsible.

When I asked a well-informed individual whether this collaborative, student-centered approach was characteristic of the Common Core methodology, she answered in the affirmative and explained: “The whole idea of the students working in groups stems from the ideas in Outcome Based Education where they think students need to know how to work together as they do in the workforce. The teacher becomes a facilitator instead of an instructor. **It is clear that people who come up with these ideas don't understand kids. Students must understand the material on their own before they can add anything to a group.** “Social justice” is in the middle of this movement. They would rather lower the bar for everyone, making it look like there is equal opportunity than to allow students to achieve to the best of their ability. If they cannot fix what is wrong in the under-performing schools, then they change the expectation for all students.” Her comments certainly fit the “one-size-fits-all” description that so aptly describes the Common Core paradigm.

Providing group activities has some merit if used *sparingly*, for an interesting change of pace, to apply what has already been thoroughly explained by the teacher. In general, however, team-building should be left to sports coaches.


In my college teaching years ago, I encountered far too many students who were severely deficient in their understanding of basic math concepts. This was a result of a different type of foolish educational experiment – one that muddled their minds with useless theoretical concepts, namely, the “*newmath*.” Now the granddaddy of all educational experiments is being foisted on our students. Common Core is a breeding ground for methodologies such as the collaborative/facilitator techniques described above that are equally foolish and even more educationally counterproductive than those that have been tried and discarded in the past. If these practices embraced by Common Core are allowed to continue, another generation of math illiterates will be spawned.

One has to wonder why educators periodically create these preposterous methodologies for transforming our educational system. There are two answers **FOLLOW THE MONEY** and **CONSIDER THE POLITICAL AGENDAS**.

Money: Each new initiative provides financial windfalls for innumerable special interest groups that are either directly or peripherally connected to education – book publishers, educational suppliers, technology companies, curriculum and test designers, educators, etc., etc. It is significant that many of these special interest groups and corporations that serve to profit from the implementation of Common Core provided funding to the trade groups that initially led its creation, namely, the National Governor’s Association (NGA) and the Council of Chief State School Officers (CCSSO). In addition, some Pennsylvania organizations who have written testimonies to the IRR in favor of the standards have received generous donations from the Gates Foundation (which itself strongly supports Common Core). There is no question that many people and corporations are profiting enormously from its implementation.

Political Agenda: The “spreading the intellect” collectivist mindset of the methodology utilized in my grandsons’ algebra classes is education’s version of our current administration’s agenda of “spreading the wealth.” This is even more chilling and disturbing than the profit motive. Common Core’s one-size-fits-all approach diminishes individualism. It is the great leveler – the “everyone gets a trophy” mindset.

I have always strongly supported the public school system, but the manner in which Pennsylvania’s Department of Education has enabled self-serving individuals and corporations to manipulate our educational system to the detriment of the students is fast changing my mind. The process of using our children as guinea pigs in untested, costly educational experiments must STOP!



Respectfully,

Joanne Yurchak
West Chester, PA
yurchak@science.widener.edu

UCSSO (Council of Chief State School Officers) Corporate Sponsors

Level 1 Partners By JANICE BOWMAN

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Companies DRC Insight™ assess the teachers

ETS teachers professional development programs

Qity e-learning Platform allows everyone to use curriculum marketplace.

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Janice Bowman <jfbow@me.com>
To: Janice Bowman <jfbow@mac.com>
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November 11 2013 3:59 AM

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October 17, 2013

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Gifts Money and Commencement

For major organ. responsible for class meeting -

(NBA), the CCSSC, Advice, and Student (lecturer) Partners -
Received total \$147.9 million, and \$32.8 million of which
is expressly to advance CS. (NASBE)

NEA and AFT (\$5.4 million); Nat Assoc of State Board of Ed (2,325,628)
\$4 million (ECS)

Education Commission of the States (799,221); Hillsboro County (Conn)
of PTA/PTSA (FLA) (800,000); Military Child Education Coalition (419,963)
Council of State (GA) 369,623; National Writing Project (3,095,593);
National Council of Teachers of English (249,482)

Charles L. Legacy Foundation (Ga Dept of Ed) 1,555,547; Delaware Dept of Ed (2,400,000)
Ga Dept of Ed (1,980,892); Atlanta Public Schools 500,000; Ford City Schol (151,200)

Indiana Dept of Ed (12,028,366); PA Dept of Ed (526,860); School District
of Philadelphia (500,000); LA Dept of Ed (7,351,708); Baton Rouge
Foundation (850,000); Office of Super. of Public Instr. (Sovereign)

Illinois (75,000); Region 8 ESC (Ed Service) of Northeast Ohio (249,505)
Albuquerque Public Schools (New Mexico) 500,000

Cleveland Metropolitan School District (Ohio) 497,752;
Perkins for the Blind (Massachusetts) 949,113.

DePaul University (248,343); George Washington Univ. (259,895)
Harvard Univ. (557,168); Miss Inst of Tech (3,004,132) Michigan State (650,000)

NY Univ (40,252); Purdue Univ (1,453,832); Regent Univ of Va (2,292,502)
USC (942,527); Stanford University (2,292,502); Univ of Kentucky

Univ of Arizona (3,416,901) University of Fla (250,000); Univ of Kentucky
Research Foundation (1,000,000); Univ of Michigan (4,959,999); Univ of
Massachusetts, Lowell (249,826); Univ of the State of NY (602,000);
University of Washington Foundation (610,819).

America (Open Fund) (100,000); American Enterprise Institute for
Public Policy Research (1,068,788); Aspen Institute, web (6,689,945)

Facing History and Our Common Future, Inc. (231,846); James B.
Hunt Jr. Institute for Educational Leadership and Policy (359,000)

Knowledge Fund. (241,747); Nellie Mae Educational Inst.
New America Fund (200,000); Thomas B. Fordham Institute (1,961,116)

NOTE SEE LAST PAGE

Achievement Network (3,452,500)
America's Promise (500,000)

Battelle for Kids \$249,808

Benchmark Education Company, LLC \$25,000

BetterLesson, Inc. \$3,527,240

Center for Applied Linguistics \$249,396

Center for Curriculum Redesign, Inc. \$198,000

Center for Teaching Quality, Inc. \$645,307

Common Core, Inc. \$350,844

Common Ground Software, Inc. \$500,000

ConnectEDU, Inc. \$499,375

Council for a Strong America \$1,550,000

Creative Commons Corporation \$1,099,687

Cristo Rey Network \$556,006

Education Development Center, Inc. \$211,793

Expeditionary Learning Outward Bound, Inc. \$250,000

Filament Games, LLC \$25,000

Fund for Public Schools, Inc. \$1,815,810

JUMP Math \$698,587

iCivics, Inc. \$500,000

Khan Academy, Inc. \$5,544,028

Learning Forward \$999,795

LearnZillion, Inc. \$1,215,525

Massachusetts Business Alliance for Education, Inc. \$151,431

MetaMetrics, Inc. \$3,468,005

National Center for Family Literacy, Inc. \$236,796

National Math and Science Initiative, Inc. \$248,760

National Paideia Center \$659,788

New Teacher Center \$250,000

New Venture Fund \$578,000

New Visions for Public Schools, Inc. \$8,399,935

Pennsylvania Partnerships for Children \$240,000

Prichard Committee for Academic Excellence \$198,206

Reasoning Mind, Inc. \$742,996

Research in Action, Inc. \$1,309,409

Rockefeller Philanthropy Advisors, Inc. \$4,618,652

Scholastic, Inc. \$4,463,541

Six Red Marbles, LLC \$500,000

State Education Technology \$500,000

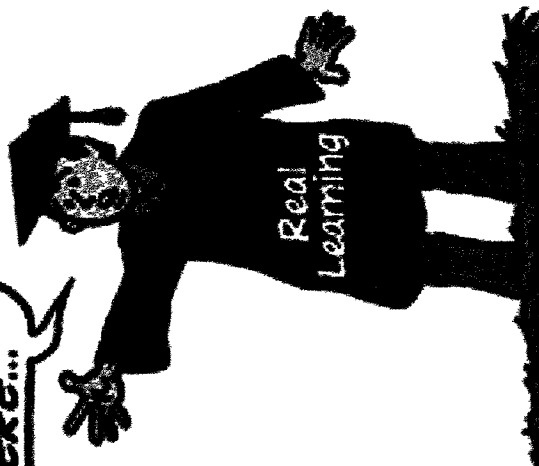
WestEd \$30,000

If I attempted to examine all grant details represented by this list, this post would never end. Therefore, I will discuss a few of the larger Gates payouts listed above.

I DID IT! I RACED TO THE TOP!



UM... I'M OVER HERE...



STANDARDIZED TEST SCORES

LEARNING, SKILLS, JOBS

Bill Gates: ‘It would be great if our education stuff worked but...’

By Valerie Strauss, Updated: September 27 at 12:54 pm

“It would be great if our education stuff worked, but that we won’t know for probably a decade.”

That’s what Bill Gates said on Sept. 21 (see video below) about the billions of dollars his foundation has plowed into education reform during a nearly hour-long interview he gave at Harvard University. He repeated the “we don’t know if it will work” refrain about his reform efforts a few days later during a panel discussion at the Clinton Global Initiative.

Hmmm. Teachers around the country are saddled every single year with teacher evaluation systems that his foundation has funded, based on no record of success and highly questionable “research.” And now Gates says he won’t know if the reforms he is funding will work for another decade. But teachers can lose their jobs *now* because of reforms he is funding.

In the past he sounded pretty sure of what he was doing. In this 2011 oped in The Washington Post, he wrote:

What should policymakers do? One approach is to get more students in front of top teachers by identifying the top 25 percent of teachers and asking them to take on four or five more students.

Actually, that’s not an approach any educator I know would think is a good idea, but Gates had decided that class size doesn’t really matter. Earlier, he had put some \$2 billion into forming small schools out of large high schools, on the theory that small schools would better serve students. When the initiative didn’t work out as he hoped, he moved on by spending hundreds of millions of dollars on teacher evaluation systems that in part linked teacher assessments to student standardized test scores, an approach that many assessment experts have warned against.

Now he says that the success of his experiments on public education won’t be known for a decade, but we already know that evaluating teachers by student test scores is a bad idea.

Education reform should not be driven by private philanthropists with their own agendas, however well-intentioned.

Here’s the video of Gates at Harvard, where he was questioned by David Rubenstein, the billionaire co-founder and co-chief executive officer of The Carlyle Group, a private-equity firm based in Washington D.C., before an audience assembled to help launch Harvard’s newest fund-raising campaign.

This is the interview in which he said that the keyboard combination of hitting the control, alt

WHAT'S WRONG WITH STANDARDIZED TESTS?

Multiple-choice & short-answer tests are poor measures of student achievement,

particularly of the ability to understand and use complex material.



Test scores are not reliable.

An individual's score may vary significantly from day to day due to testing conditions or the test-taker's mental or emotional state.

Test-makers can't remove all bias.

Cultural assumptions built into tests often remain.



Standardized tests are not objective.

Decisions on what to include, how questions are worded, which answers are "correct," and the uses of results are all made by subjective human beings.

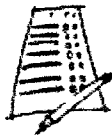


There ARE BETTER WAYS to evaluate achievement and ability:

Good teacher observation, documentation of student work, and performance-based assessment are most useful.

High-stakes tests cause curriculum to be narrowed to just what is on the test.

Teachers feel pressed to boost scores, even to cheat, and educational quality often suffers.



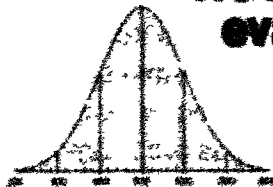
Tests do not reflect current knowledge about learning.

There has been enormous progress in this area. Tests are mostly based on outdated assumptions.



Standardized tests are NOT fair & helpful evaluation tools.

They reward quick answers & do not measure deep or creative thinking in any field.



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Published on Nov 11, 2013

The United States Department of Justice canceled a school board meeting in Volusia County, Florida so the district could avoid addressing Parent Concerns over the use of a textbook that is

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Virginia schools boards pass anti-SOL resolutions

By Valerie Strauss, Updated: October 27 at 9:08 am

About 30 school boards in Virginia have passed resolutions that call on education officials to revamp the Standards of Learning testing system, saying that there is “little research” that shows that students “will be better prepared to succeed in their careers and college” by taking the 34 standardized tests the state gives to each child between grades 3-11.

The resolutions in Virginia — where there are about 130 school districts — are part of a growing backlash around the country by academics, educators, parents and others against the use of standardized tests as the chief “accountability” metric to evaluate students, teachers, principals and schools for high-stakes purposes.

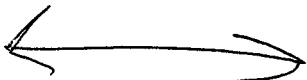
In 2012, Texas became the first state in which school boards began to pass anti-testing resolutions and other states followed suit. A [national resolution protesting high-stakes standardized testing](#) was then released by a coalition of national education, civil rights and parents groups, as well as educators who are trying to build a broad-based movement against the Obama administration’s test-centric school reform program. More school boards in Virginia are expected to pass an anti-SOL resolution.

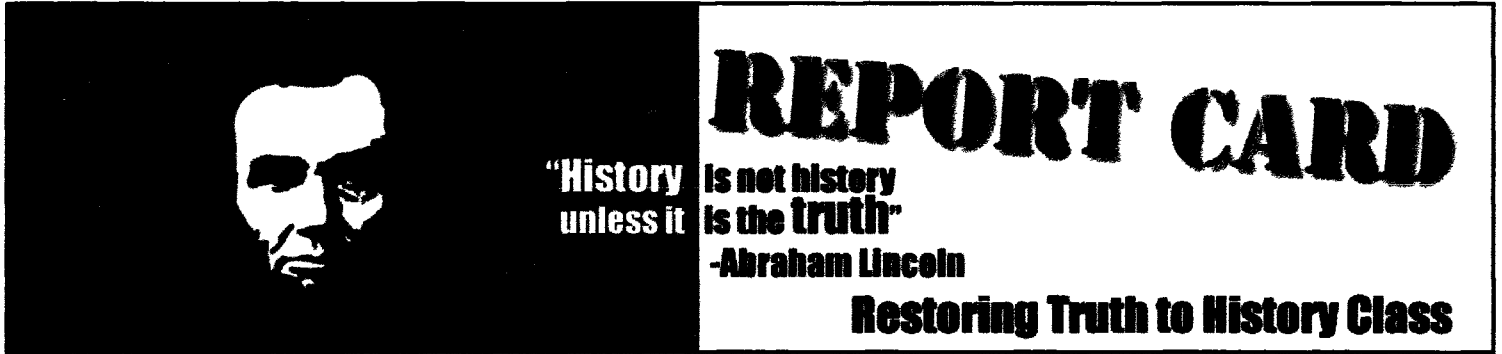
A year earlier, in 2011, a group of Virginia school superintendents [indirectly bashed the Standards of Learning](#) by trying (unsuccessfully) to get the state to allow students to take their SOL exams anytime during the school year rather than at the end of the year. In 2012 and this year, the state [introduced tougher SOL exams](#) in reading and math, leading to a drop in schools in both subjects.

The resolutions all say that the Standards of Learning are not good measures of how well students, teachers and schools are actually doing and that there is little evidence that the practice of using student test scores to evaluate teachers and principals has any validity. They ask the Virginia General Assembly to:

...create a new accountability system that “encompasses balanced assessments, reflects greater validity, uses more cost efficient sampling techniques and other external evaluation arrangements, allows for expedited test retakes, and more accurately reflects what students know.

The resolutions being passed are all nearly identical to a model on the [Web site of the Virginia Association of School Superintendents](#), which is leading the effort. (See text below of a resolution passed in York County.) The Smith Mountain Eagle quoted Steve Staples, the former superintendent of York County Schools and the current executive director of the Virginia Association of School Superintendents, [as saying](#):

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-Abraham Lincoln

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Common Core and Pearson Falsify Constitution

Posted on 08 November 2013 Tags curriculum reform, educational standards, failure of common core standard, Pearson Publishing



By Bill Korach www thereportcard.org

Once again Pearson is in the news. Pearson has published classroom worksheets that grossly mislead students on the Constitution, separation of powers, and the role of a "government of the people, by the people and for the people." The worksheets appear to be indoctrinating students about the notion of an all-powerful presidency and the subordination of the citizen to the state. The ideas conveyed in the worksheets are more appropriate to Stalinist indoctrination than true American education through exposure to ideas and critical thinking. In fact, while the supporters of Common Core say it encourages critical thinking, the reality is quite the opposite.

Teaching materials aligned with the controversial national educational standards ask fifth-graders to edit such sentences as "(The president) makes sure the laws of the country are fair," "The wants of an individual are less important than the well-being of the nation" and "the commands of government officials must be obeyed by all."

"Parents should insist on reviewing their children's school assignments," said Glyn Wright, executive director of the Eagle Forum, a think tank that opposes implementation of Common Core. "Many parents will be shocked to find that some 'Common Core-approved' curriculum is full of inappropriate left-wing notions, disinformation, and fails to teach the truth of American exceptionalism and opportunity."

CLICK HERE FOR THE FULL WORKSHEET

The lessons are filled with inaccuracies about the Constitution: The job of making sure laws are fair is not the president's, but the judicial branch's. The executive branch's duty is to administer laws. And the example that places the well-being of the nation above the "wants of an individual" appears to run counter to the basic principles of the Bill of Rights.

A Pearson spokesperson told FoxNews.com the "Hold the Flag High" worksheet will undergo some editing of its own, based on issues raised by critics, including Education Action Group Foundation.

"These particular questions appear in a fifth-grade unit of Pearson's Reading Street, an English Language Arts program," the Pearson official said. "They accompany a selection about soldiers during the Civil War, and they attempt to make a connection between that passage and language skills. As with all our curricular materials, they underwent a thorough development and review process. Still, we are always open to improving our work ...

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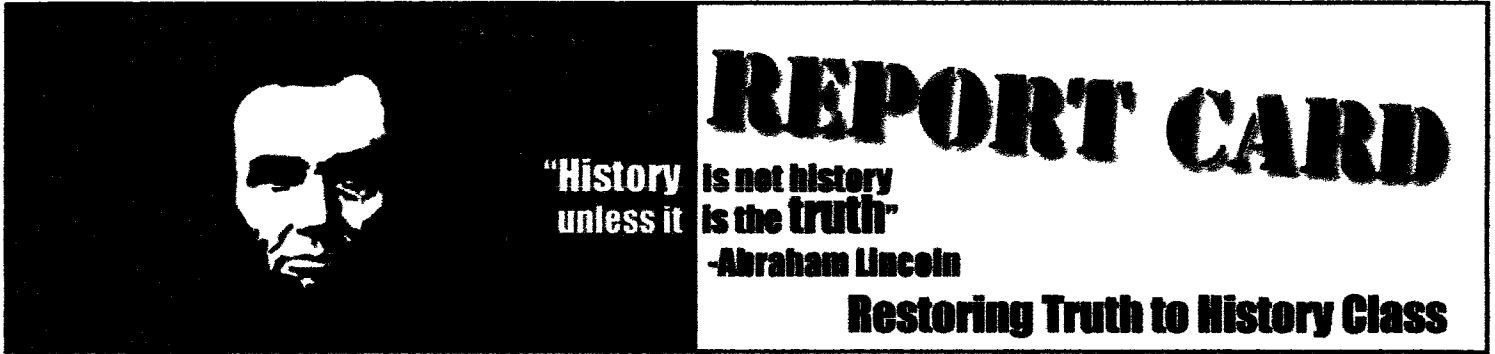
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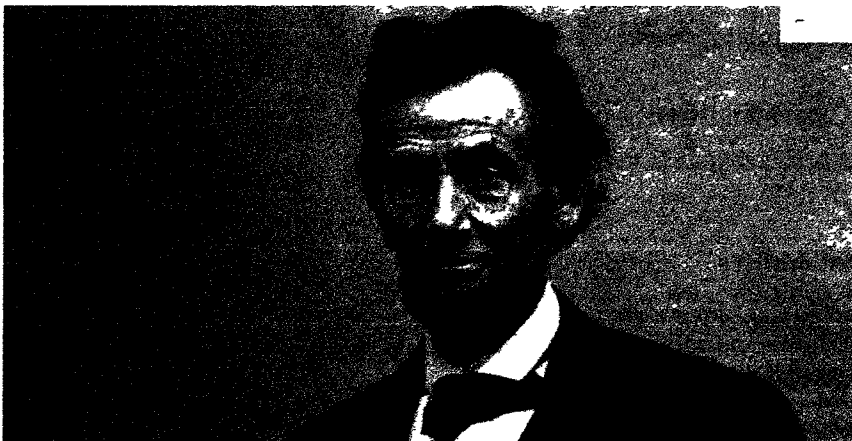


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-Abraham Lincoln

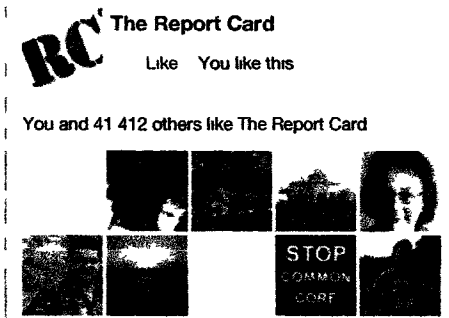
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Classical Education: The Right Answer to Common Core and Failed Big Government Education



15 November 2013

(Editor: www thereportcard org At the recent "Dare to Think" conference on restoring America's historical heritage and educating our children on American Exceptionalism, Dr Daniel Scoggin of Great Hearts Charter presented the Classical school model Great Hearts students average 1833 on their SAT's, outperforming all schools in Arizona including all but one private school 95% of []

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Chicago College Re-Writes History: Lincoln a "Democrat"



14 November 2013

By Bill Korach www thereportcard org A plaque at Northeastern Illinois University in Chicago states "This building is dedicated to public service honoring the memory of Abraham Lincoln Democrat" Lincoln, of course was a Republican and in fact one of the founders of the Republican Party The strangely worded plaque was installed in 1905, but Charlie Kirk, []

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13 November 2013

by Will Fitzhugh, Publisher The Concord Review When it comes to working together to support the survival and enjoyment of history for students in our schools, why are history teachers, as a group, as good as paralyzed? Whatever the reason, in the national debates over nonfiction reading (history books, anyone?) and [...]

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Common Core and Pearson Falsify Constitution



08 November 2013

By Bill Korach www.thereportcard.org Once again Pearson is in the news. Pearson has published classroom worksheets that grossly mislead students on the Constitution, separation of powers, and the role of a "government of the people, by the people and for the people." The worksheets appear to be indoctrinating students about the notion of an all-powerful [...]

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"Dare to Think" History Conference Maps Path to Restore Our National Memory



06 November 2013

By Bill Korach www.thereportcard.org "Dare to Think" a conference on November 4, 5 co-hosted by The Report Card Publisher Bill Korach and Clay County

132 Catholic Scholars: "Common Core a Grave Disservice to Catholic Education."



12 November 2013

by Bill Korach www.thereportcard.org (Editor: 132 Catholic Scholars at both Catholic and non-Catholic Universities have written a resounding letter to Catholic Bishops urging them to reject Common Core Standards in Parochial Schools. The scholars from universities as diverse as Berkeley, Notre Dame, Georgetown, and Wake Forest, say the Common Core "would be a "grave disservice [...]"

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Pearson and Common Core: The Unholy Alliance



07 November 2013

By Bill Korach www.thereportcard.org Pearson is much more than a publishing company. They are in the business of shaping education and education policy from front to back in both America and the UK. Pearson textbooks such as "World History" have been cited as biased toward Islam by Act for America and Citizens for National [...]

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Want Kids to Learn? Reject "Self Esteem" Bring Back Reciting, Writing!



02 November 2013

www.thereportcard.org (Editor: The problem with politically correct teaching techniques, is that kids don't learn anything. Other than that, they are great!

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ALL COMMENTS (43)

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EXHIBIT: #1

ALLENTOWN SCHOOL DISTRICT (ASD) REVENUE SOURCES INFORMATION

YEAR	TOTAL REVENUE	TOTAL LOCAL REVENUE (%)	TOTAL STATE REVENUE (%)	TOTAL FEDERAL REVENUE (%)	TOTAL OTHER (%)
2011	227,288,127	80,338,501 (35.35%)	120,951,256 (53.21%)	25,978,500 (11.43%)	19,890 (0.1%)
2010	211,245,310	75,169,480 (35.58%)	112,333,948 (53.18%)	22,591,682 (10.69%)	1,150,000 (0.54%)
2009	201,962,683	72,145,993 (35.72%)	113,300,664 (56.10%)	15,365,825 (7.61%)	1,150,000 (0.57%)
2008	192,090,925	84,461,607 (47.61%)	91,573,112 (47.67%)	15,139,864 (7.68%)	916,342 (0.48%)
2007	180,226,134	85,807,515 (49.55%)	81,151,570 (45.03%)	12,483,161 (6.93%)	783,388 (0.43%)
2006	165,785,239	82,142,457 (49.55%)	69,093,835 (41.68%)	13,864,149 (8.36%)	684,796 (0.41%)
2005	156,368,286	76,615,801 (50.3%)	63,582,503 (40.7%)	13,536,185 (8.7%)	633,797 (0.4%)
2004	140,250,018	74,088,176 (52.8%)	55,053,282 (39.3%)	10,609,386 (7.6%)	499,224 (0.4%)
2003	126,417,443	68,561,216 (54.2%)	51,390,497 (40.7%)	5,973,811 (4.7%)	491,918 (0.4%)
2002	123,230,225	66,321,496 (53.8%)	49,094,465 (39.8%)	7,261,228 (5.9%)	533,037 (0.4%)
2001	113,398,065	62,651,719 (55.3%)	43,689,482 (38.5%)	6,277,731 (5.5%)	773,133 (0.7%)
2000	112,783,762	66,086,785 (55.9%)	42,97,758 (37.3%)	6,055,954 (5.4%)	1,533,265 (7.4%)
1999	108,478,424	61,548,653 (56.7%)	40,952,722 (37.8%)	5,214,276 (4.8%)	762,773 (0.7%)
1998	106,133,436	61,047,247 (57.5%)	39,519,472 (37.2%)	4,149,127 (3.9%)	1,417,590 (1.3%)
1997	103,738,820	60,686,527 (58.5%)	39,179,768 (37.8%)	3,590,033 (3.5%)	282,492 (0.3%)
TOTAL	2,269,696,897	1,077,673,173	1,013,837,334	168,090,912	10,115,348

THIS INFO IS FROM THE PA. DEPT OF ED AND ASD WEBSITE!!! COMPLETED September 8, 2011

THIS IS THE COST OF 15 ++ YEARS OF PSSA FAILURES FOR THE ASD IN ALLENTOWN, PA.!!!! HOW MUCH MORE MONEY DO YOU THINK IT WILL TAKE TO GET SUCCESS IN PASSING PSSA'S???? WHO DO WE MAKE ACCOUNTABLE FOR THE FAILURE ???

18



Budget Facts 2012

from the COMMONWEALTH FOUNDATION

February 2012

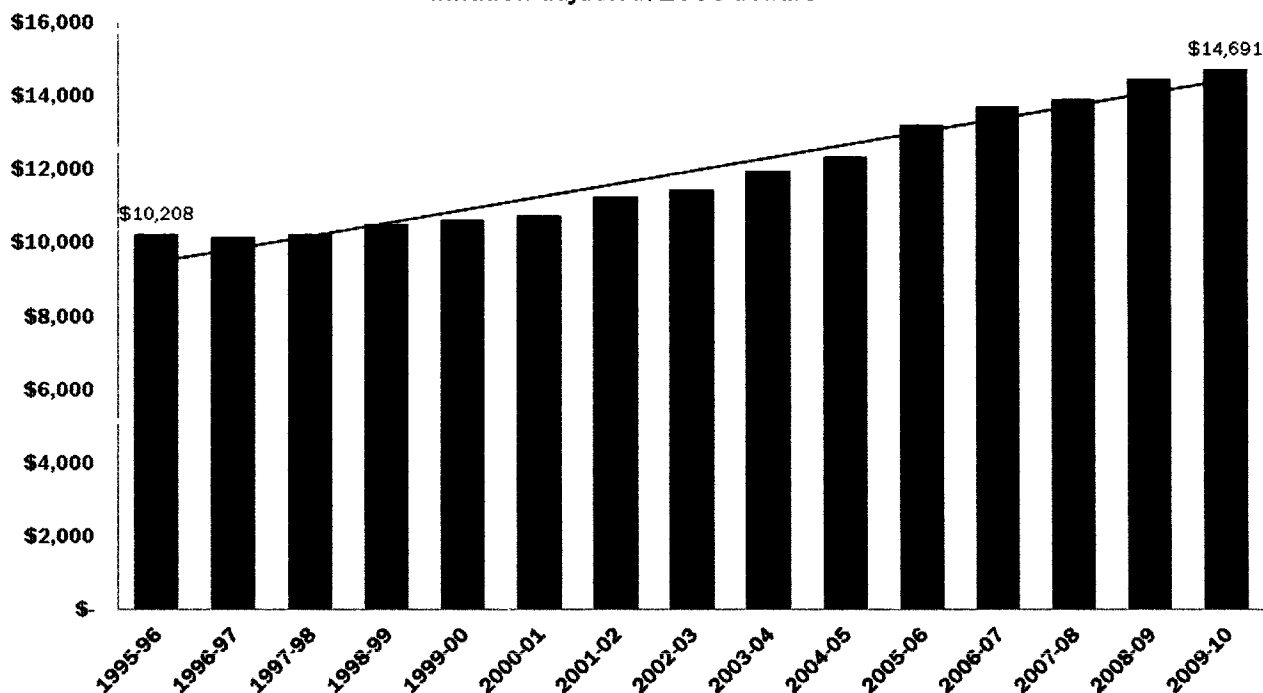
Pennsylvania K-12 Education Spending

PENNSYLVANIA PUBLIC SCHOOL SPENDING CONTINUES TO GROW

- Overall K-12 revenue and spending has dramatically increased in Pennsylvania over the last 15 years.
 - ⇒ Pennsylvania's K-12 education revenue increased from **\$13 billion in 1995-96** to **\$26 billion in 2009-10**. Adjusted for inflation, that represents a **44% increase in revenue per student**.
 - ⇒ Pennsylvania school districts spent **more than \$14,000 per student** in the 2009-10 school year.
- School construction and debt spending has more than *doubled* in the last 15 years, increasing by 140% from \$1.2 billion in 1996-97 to \$2.9 billion in 2009-10.
 - ⇒ Prevailing wage laws increase the average cost of construction by 20% or more; repealing this mandate would save \$400 million a year in property taxes.

Pennsylvania Public School Revenue Per Student

Inflation-adjusted, 2009 dollars



Source: Pennsylvania Department of Education

PUBLIC SCHOOL STAFFING HAS INCREASED WHILE STUDENT ENROLLMENT HAS DECLINED

- Student enrollment has *decreased* by 35,510 since 2000 while schools have hired **35,821 more staff members**.
 - ⇒ Most of these new employees pay hundreds of dollars in dues and fees to the PSEA or PFT labor unions as a condition of employment.
 - ⇒ In 2010-11, the PSEA spent \$4.2 million in dues on political activities and lobbying against substantive education reforms, including school choice, teacher evaluations, and taxpayer control of tax increases.

K-12 PUBLIC EDUCATION PERFORMANCE HAS STAGNATED

- Despite these spending and staff increases, performance on the National Assessment of Educational Progress, the national exam used to compare state performance, has changed little.
- Academic studies have found **little or no correlation** between student achievement and class size, teacher salaries, or per-student expenditures.
 - ⇒ A 2010 study by 21st Century Partnership for Science, Technology, Engineering, and Mathematics Education (21PSTEM) comparing 11th grade math, reading, and science scores on Pennsylvania state tests with district per-student spending found **low-spending districts often outperform high-spending ones**.
 - ⇒ Another 21PSTEM study looked at the 30 Pennsylvania school districts that improved the most on 11th grade reading and math performance and the 30 districts that declined the most from 2004 to 2010. **Schools that declined in performance had higher increases in total per-student spending.**
- Pennsylvania's average composite SAT score in reading and math has hovered around 995 for the last 15 years, despite doubling spending.

PUBLIC SCHOOLS HAVE \$2.8 BILLION IN RESERVES

- At the end of the 2009-10 school year, public schools had **\$2.82 billion in fund reserves**.
 - ⇒ This includes \$1.7 billion in undesignated funds, and \$1.1 billion in funds designated for specific future use.
 - ⇒ **School reserve funds have grown by 140%** (from \$1.3 billion to \$2.8 billion) since 1996-97.

SCHOOL CHOICE COSTS TAXPAYER LESS

- **Private, charter and home schools educate more than 380,000 children at far less cost to taxpayers** than the \$14,000 per student spent by school districts.
 - ⇒ **Private, nonpublic schools** serve more than 287,000 students with some receiving state support (including transportation costs going to school districts) of less than \$1,000 per student.
 - ⇒ **Educational Improvement Tax Credit scholarships**—which averaged about \$1,000 per scholarship in 2009-10—served approximately 39,000 students with an average family income of less than \$30,000.
 - ⇒ **Charter schools**, including cyber charter schools, served 90,000 students in 2009-10 at about \$2,400 less per student than school districts spent.
 - ⇒ **Homeschooled children**, approximately 22,000 according to 2007-08 data from the Pennsylvania Department of Education, receive no direct taxpayer support.
- Parents choosing non-traditional public schools saved taxpayers **more than \$4 billion in the 2009-10 school year**, based on school district spending per student.

Total Taxpayer Savings from Students Attending Schools of Choice

2009-10 School Year

	Savings Per Student*	Number of Students**	Total Savings
Private and Nonpublic	\$13,279	287,092	\$3,812,403,692
EITC Scholarship Students	\$12,235	38,646	\$472,848,486
Home School	\$14,301	22,000	\$314,622,000
Public Charter (Total)	\$2,367	73,054	\$172,903,936
Cyber Charter	\$3,366	20,406	\$68,685,860
Total		382,146	\$4,299,929,628

* Includes All state funding for nonpublic schools plus tax credits for EITC scholarships as a cost. ** Homeschooling enrollment estimate based on 2007-08 PDE data.

Sources: PA Department of Education, Summaries of Annual Financial Report Data; Public School Enrollment Reports,
http://www.portal.state.pa.us/portal/server.pt/community/data_and_statistics/7202

###

For more information on the **Pennsylvania State Budget**, visit www.CommonwealthFoundation.org/Budget



21 November 2013

Comments before the Independent Regulatory Review Commission
Re: Final Form Regulations #6-326 related to graduation requirements

It is unfortunate that due to un-informed, ill-advised and narrow minded decisions of elected and appointed officials in the commonwealth going back to June, 2009 that Pennsylvania finds itself in the midst of this latest experiment in education reform called Common Core.

These decisions have welded Pennsylvania to a protocol of rigorous education standards and assessment systems tied to national Common Core Curriculum Standards and standardized assessments. Actions taken within the commonwealth have made some adjustments to these national approaches. Pennsylvania has adopted the Pennsylvania Core Standards and Keystone Exams as the assessment mechanism. The degree to which these adjustments are in fact driven by the needs of Pennsylvania at either a state or local level is subject to widely different opinions.

There is one element of the Chapter 4 regulations in front of you today that is not embodied in what was committed to by prior decisions and actions. That element has to do with a graduation requirement tied to proficiency on 3 Keystone Exams for students due to graduate in June, 2017. It is this element of chapter 4 which I strongly object to and urge the Commission to strip from what is in front of you today.

As an elected Director of a local school board, I am empowered by the voters to act as the general agent of the people in the matter of public education. This includes (1) the establishment of educational goals for district students, (2) govern a program designed to meet those goals and (3) levy taxes as necessary to implement the required programs. The district I represent is unique and its students are unique which by itself makes the concept of national or state wide standards driven by one size fits all curriculum approaches and standardized tests incompatible. Unfortunately, we find ourselves in this dichotomy with no way out.

Elimination of Keystone Exams, as a graduation requirement, is the sensible thing to do for a multitude of reasons:

1. Due to the high-stakes nature of the Keystone Exams, local districts are already spending significant dollars on Keystone tutors and test preparation. This will only expand as more Keystone Exams are added over time. This additional expense is just the tip of the iceberg of

unfunded mandates associated with implementation of PA Core standards.

2. Taxpayers in my district cannot take on 1 more dollar of property tax. The tight Act 1 caps along with escalating pension and health care obligations are bad enough. The unfunded costs associated with PA Core are estimated to be at least \$300 million and will devastate local economies. In order to protect the financial welfare of the local taxpayers, school districts will be compelled to begin cutting educational programs.
3. Those that cannot achieve proficiency on the Keystone Exams even after remediation will graduate through the project based door. This is yet another unfunded expense for the local districts. This project based step will take additional time out of the classroom and away from the person that really matters in this equation, the teacher.
4. It is not logical to place a passing performance on a standardized test as a barrier to graduation when the student must also pass the class. The PA Core standards and supportive curriculum will drive what goes on in the classroom adjusted to the individual needs of students based on their different learning styles.


The Regulatory Review Act of 1982 established this commission to among other things ensure that agency regulations are in the public interest. The commission is charged with considering 3 areas during their deliberations, two of which are economic impact and reasonableness. Chapter 4, as currently written fails on 2 of the considerations and is not in the public interest. The unfunded mandates alone make Chapter 4 an albatross that will destroy local taxpayers. You simply must not allow this to happen and find a way to make sure that the state board does not mandate without legislative financial support. The Keystone Exam linkage to graduation is NOT reasonable and is not in the public interest due to the disruptive nature of this venture into the unknown.

Respectfully,



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Tom Corbett
Governor
Commonwealth of Pennsylvania

Co-Chair
John Moran
President & CEO
Moran Industries, Inc

November 19, 2013

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

Email: irrc@irrc.state.pa.us

Dear Chairman Lutkewitte:

Team Pennsylvania Foundation supports final-form regulation #6-326 (Academic Standards and Assessments) that adopts the Pennsylvania Core Standards in English and math and aligned assessments, including Keystone Exams. The regulation also includes important safeguards and supports to ensure struggling students have the extra help they need to succeed.

As a nonpartisan, public-private partnership with a focus on economic and workforce development, Team PA entered into this conversation back in 2008 to respond to the concerns of Pennsylvania business owners. It's quite simple: with facilities and potential job opportunities from Erie to Easton and everywhere in between, businesses need employee predictability, and business leaders need to have confidence in the quality of Pennsylvania's high school diploma.

A 2009 survey of 400 business owners and senior managers conducted by Susquehanna Polling & Research determined the following: more than 80 percent believed that statewide education standards and course-by-course final exams would improve the quality of the workforce in Pennsylvania.

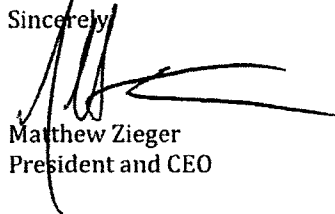
Business leaders continue to talk about recent graduates who lack the basic reading, writing, and math skills to succeed in the workplace, and that's not surprising, since about one-third of students who graduate from high school in the commonwealth -- about 44,000 each year -- fail to perform at a proficient level on the state's 11th grade reading and math assessments.

When high school students are allowed to graduate without the knowledge and skills necessary for success in higher education or the workplace, businesses, taxpayers, parents, students, and institutions of higher education are forced to waste significant amounts of money, time, and resources on remediation.

Looking to the future, we need a vibrant educational system with rigorous, internationally benchmarked standards (PA Core Standards) and aligned assessments, including Keystone Exams, which produce students with the necessary skills and to help businesses succeed and grow.

Team PA supports the adoption of strong standards such as the Pennsylvania Core Standards and aligned assessments, including Keystone Exams. We encourage the Commission to adopt the final-form regulation, which we believe would add significant value to Pennsylvania's high school diploma and workforce.

Sincerely,



Matthew Zieger
President and CEO

Cheryl E. Boise
Retired Director the Commonwealth
Education Organization
Eboise07@aol.com
IRRC Meeting, November 21, 2013

I would like to address some of the talking points used to sell the Chapter 4 changes.

1. This will set minimal standards and does not impact the district's ability to handle their own curriculum and meet the needs of all the students.

I attended an Intermediate Unit presentation over the summer regarding the math changes and how that relates to STEM. I asked the question what did they think of the proposed changes by the College Board (the CEO of the Board, David Coleman is one of the architects of the national standard initiative) where the AP Calculus test would be eliminated given Calculus is not part of the Common Core sequence. I was told by the IU that it was a good thing given Calculus is not part of the math sequence. Students will be taught fewer math concepts, but what is taught will be more in depth. This may meet the needs of those students who will only meet the criteria for Algebra I prior to their graduation. However, speaking with engineers this does not meet the needs of STEM, nor does it meet the needs of students who have the ability to move at a faster pace in math. While potentially raising the bar for some students, PA is lowering the opportunities for others.

The concept the IU discussed related to group learning, with the teacher as the facilitator, was a bad idea when it was introduced under Outcome Based Education and continues to be a bad idea. It does not account for the varying learning styles of students, does not provide the foundation of basic facts especially in math, and frustrates the top students doing all the work. It also does not give the slower performing students the individualized help they need. Student cannot be an effective part of a group until they learn basic concepts on their own.

2. The State Board and Dept of Education use the term rigorous when speaking of these standards.

Back in 1999 when they established the state standards in Math and Language Arts, PA called them rigorous as well. With the previous standards the state hired outside sources to review the final draft of the proposed standards. To date, I have not received any verification we had an outside objective review of the current standard changes. However, groups like the Hoover Institute looked at how each of the states aligned themselves to the national standard framework. With the initial alignment in 2010, and again with some of the changes in 2012, the opinion is PA lowered the expectations each time they touched the standards.

3. The Department of Education is promising students unable to master these standards and pass the Keystone Exams will receive remedial help.

There are 500 school districts all with different budget issues and teacher contracts. Having spoken with individual schools districts there is no way the State Board, or Dept of Education can make those promises. Some districts have furloughed staff. Some of the districts are considering the option of having the students repeat the whole class, because they would have to use supplemental contracts to allow teachers to tutor, since this goes beyond the scope of their normal contractual job description. Other schools are taking time out of the day to remediate some students while other students get a study hall, or go to the auditorium when the teachers are tutoring. Is the objective to waste the academic time for some students based on the remedial needs of the other students? Technology, or online tutoring, is also an issue given some districts are very limited in technology as compared to other districts. This becomes a major cost factor.

4. The State Board and Department of Education are indicating these changes will eliminate social promotion when in reality the project based assessment is nothing more than state sanctioned social promotion. The districts are very concerned about the cost of the project, and the time involving the teachers.

There is also a great deal of confusion pertaining to waivers. Originally it sounded like a waiver from the testing and project would be in extreme situations, such as when a child has been ill or in the hospital. Now it is being made to seem 10% of the school population of a school district can get a waiver from passing the Keystone, or effectively doing the project. Again this is becoming nothing more than social promotion instead of trying to get to the reason of the student's inability to master the material.

5. I have binders of testimony and information from the Chapter 4 changes in 1999. The state was warned that moving from norm based testing to the PSSA would create issues. Norm based testing gave a profile shared with families and teachers that indicated individual student's yearly progress along with their weaknesses and strengths. The PSSA has not delivered the same information, or has been of the same quality. All the state has done with the PSSA is to eliminate it in the 11th grade, and insert the standard changes along with adding the Keystones. Adding another layer of testing without a comprehensive review of the PSSA is unacceptable and ineffective.
6. The fact the State Board and Department of Education has not produced a cost analysis each time they have been asked is also not acceptable. Implementing anything of this magnitude should always require cost projections. Clearly cost is a major factor related to the concerns of the districts, and effectiveness of any education changes.

Our kids deserve better than to be treated like a hunk of iron passively waiting to be mined, melted, and molded into finely tuned cogs- by the corporate-state, for the corporate-state. The corporate wing of this beast wants to grind our kids into plug and play parts to install in their widget companies. The state wing of this beast wants to use our kids as the currency in what amounts to a giant corporate welfare bonanza. Together, they treat our kids like a commodity to be bought, sold, and harnessed for their benefit.

Common Core is an industrial model that grooms students into compliant servants who won't have the audacity to question, experiment, innovate, and compete against their generous benefactors who cling to their buggy whips, bureaucratic temples, and smoke-filled back rooms. We can no longer allow our kids to be treated like some form of property to be exploited by this beast. No one is the property of another to be treated this way and to think otherwise is to accept slavery.

I am commenting for the purpose of stopping the final adoption of Common Core Standards but more than that I am commenting to offer alternative ideas for improving education. Effective education does not require massive amounts of money and there is certainly evidence to back this up. (Please see link 1.) America was built on the efforts of individuals with eight grade, one room schoolhouse educations. Often less! (Please see link 2.) And those individuals were empowered by being taught HOW to learn, instead of just being fed WHAT to learn because it's on "the test". (Please see link 3.)

I realize it's pretty late in the game since this is the final vote but I truly hope our kids, and our teachers, will be spared this corporate-state conscription. Our kids are not robots, our teachers are not robots, and none of them deserve to be treated like they are.

Our kids are creative, innovative, bundles of potential. Teach them how to learn then get out of their way while they create their futures.

Thank you for your time and consideration,
Zandra Bishop
Northeastern School District
Newberry Twp
York Co.

Link 1-
<http://www.wired.com/business/2013/10/free-thinkers/all/>

Link 2-
<http://www.abacus-es.com/journal/education-theory/advantages-of-the-one-room-schoolhouse-approach-to-teaching/>

Link 3-
<https://www.tragedyandhope.com/trivium/5-page-summary/>

SEE ALSO ATTACH. 4

Students in Matamoros, Mexico weren't getting much out of school — until a radical new teaching method unlocked their potential.

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ATTACH. 1
22 PGS

How a Radical New Teaching Method Could Unleash a Generation of Geniuses

BY JOSHUA DAVIS

10.15.13

6:30 AM

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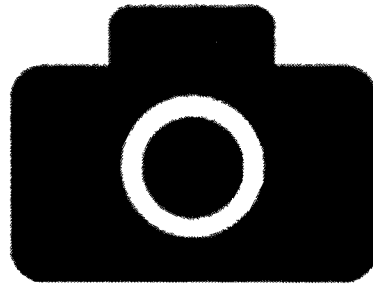
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These students in Matamoros, Mexico, didn't have reliable Internet access, steady electricity, or much hope—until a



radical new teaching method unlocked their potential.

Peter Yang

José Urbina López Primary School sits next to a dump just across the US border in Mexico. The school serves residents of Matamoros, a dusty, sunbaked city of 489,000 that is a flash point in the war on drugs. There are regular shoot-outs, and it's not uncommon for locals to find bodies scattered in the street in the morning. To get to the school, students walk along a white dirt road that parallels a fetid canal. On a recent morning there was a 1940s-era tractor, a decaying boat in a ditch, and a herd of goats nibbling gray strands of grass. A cinder-block barrier separates the school from a wasteland—the far end of which is a mound of trash that grew so big, it was finally closed down. On most days, a rotten smell drifts through the cement-walled classrooms. Some people here call the school *un lugar de*

castigo—“a place of punishment.”

For 12-year-old Paloma Noyola Bueno, it was a bright spot. More than 25 years ago, her family moved to the border from central Mexico in search of a better life. Instead, they got stuck living beside the dump. Her father spent all day scavenging for scrap, digging for pieces of aluminum, glass, and plastic in the muck. Recently, he had developed nosebleeds, but he didn't want Paloma to worry. She was his little angel—the youngest of eight children.

After school, Paloma would come home and sit with her father in the main room of their cement-and-wood home. Her father was a weather-beaten, gaunt man who always wore a cowboy hat. Paloma would recite the day's lessons for him in her crisp uniform—gray polo, blue-and-white skirt—and try to cheer him up. She had long black hair, a high forehead, and a thoughtful, measured way of talking. School had never been challenging for her. She sat in rows with the other students while teachers told the kids what they needed to know. It wasn't hard to repeat it back, and she got good grades without thinking too much. As she headed into fifth grade, she assumed she was in for more of the same—lectures, memorization, and busy work.

Sergio Juárez Correa was used to teaching that kind of class. For five years, he had stood in front of students and worked his way through the government-mandated curriculum. It was mind-numbingly boring for him and the students, and he'd come to the conclusion that it was a waste of time. Test scores were poor, and even the students who did well weren't truly engaged. Something had to change.

He too had grown up beside a garbage dump in Matamoros, and he had become a teacher to help kids learn enough to make something more of their lives. So in 2011—when Paloma entered his class—Juárez Correa decided to start experimenting. He began reading books and searching for ideas online. Soon he stumbled on a video describing the work of Sugata Mitra, a professor of educational technology at Newcastle University in the UK. In the late 1990s and throughout the 2000s, Mitra conducted experiments in which he gave children in India access to computers. Without any instruction, they were able to teach themselves a surprising variety of things, from DNA replication to English.





Elementary school teacher Sergio Juárez Correa, 31, upended his teaching methods, revealing extraordinary abilities in his 12-year-old student Paloma Noyola Bueno.

Juárez Correa didn't know it yet, but he had happened on an emerging educational philosophy, one that applies the logic of the digital age to the classroom. That logic is inexorable: Access to a world of infinite information has changed how we communicate, process information, and think. Decentralized systems have proven to be more productive and agile than rigid, top-down ones. Innovation, creativity, and independent thinking are increasingly crucial to the global economy.

And yet the dominant model of public education is still fundamentally rooted in the industrial revolution that spawned it, when workplaces valued punctuality, regularity, attention, and silence above all else. (In 1899, William T. Harris, the US commissioner of education, celebrated the fact that US schools had developed the “appearance of a machine,” one that teaches the student “to behave in an orderly manner, to stay in his own place, and not get in the way of others.”) We don't openly profess those values nowadays, but our educational system—which routinely tests kids on their ability to recall information and demonstrate mastery of a narrow set of skills—doubles down on the view that students are material to be processed, programmed, and quality-tested. School administrators prepare curriculum standards and “pacing guides” that tell teachers what to teach each day. Legions of managers supervise everything that happens in the classroom; in 2010 only 50 percent of public school staff members in the US were teachers.

The results speak for themselves: Hundreds of thousands of kids drop out of public high school every year. Of those who do graduate from high school, almost a third are “not prepared academically for first-year college courses,” according to a 2013 report from the testing service ACT. The World Economic Forum ranks the US just 49th out of 148 developed and developing nations in quality of math and science instruction. “The fundamental basis of the system is fatally flawed,” says Linda Darling-Hammond, a professor of education at Stanford and founding director of the National Commission on Teaching and America's Future. “In 1970 the top three skills required by the Fortune 500

were the three Rs: reading, writing, and arithmetic. In 1999 the top three skills in demand were teamwork, problem-solving, and interpersonal skills. We need schools that are developing these skills.”

That’s why a new breed of educators, inspired by everything from the Internet to evolutionary psychology, neuroscience, and AI, are inventing radical new ways for children to learn, grow, and thrive. To them, knowledge isn’t a commodity that’s delivered from teacher to student but something that emerges from the students’ own curiosity-fueled exploration. Teachers provide prompts, not answers, and then they step aside so students can teach themselves and one another. They are creating ways for children to discover their passion—and uncovering a generation of geniuses in the process.

At home in Matamoros, Juárez Correa found himself utterly absorbed by these ideas. And the more he learned, the more excited he became. On August 21, 2011—the start of the school year — he walked into his classroom and pulled the battered wooden desks into small groups. When Paloma and the other students filed in, they looked confused. Juárez Correa invited them to take a seat and then sat down with them.

He started by telling them that there were kids in other parts of the world who could memorize pi to hundreds of decimal points. They could write symphonies and build robots and airplanes. Most people wouldn’t think that the students at José Urbina López could do those kinds of things. Kids just across the border in Brownsville, Texas, had laptops, high-speed Internet, and tutoring, while in Matamoros the students had intermittent electricity, few computers, limited Internet, and sometimes not enough to eat.

“But you do have one thing that makes you the equal of any kid in the world,” Juárez Correa said. “Potential.”

He looked around the room. “And from now on,” he told them, “we’re going to use that potential to make you the best students in the world.”

Paloma was silent, waiting to be told what to do. She didn’t realize that over the next nine months, her experience of school would be rewritten, tapping into an array of educational innovations from around the world and vaulting her and some of her classmates to the top of the math and language rankings in Mexico.

“So,” Juárez Correa said, “what do you want to learn?”

In 1999, Sugata Mitra was chief scientist at a company in New Delhi that trains software developers. His office was on the edge of a slum, and on a hunch one day, he decided to put a computer into a nook in a wall separating his building from the slum. He was curious to see what the kids would do, particularly if he said nothing. He simply powered the computer on and watched from a distance. To his surprise, the children quickly figured out how to use the machine.

Over the years, Mitra got more ambitious. For a study published in 2010, he loaded a computer with molecular biology materials and set it up in Kalikuppam, a village in southern India. He selected a small group of 10- to 14-year-olds and told them there was some interesting stuff on the computer, and might they take a look? Then he applied his new pedagogical method: He said no more and left.

Over the next 75 days, the children worked out how to use the computer and began to learn. When Mitra returned, he administered a written test on molecular biology. The kids answered about one in four questions correctly. After another 75 days, with the encouragement of a friendly local, they were getting every other question right. “If you put a computer in front of children and remove all other adult restrictions, they will self-organize around it,” Mitra says, “like bees around a flower.”

A charismatic and convincing proselytizer, Mitra has become a darling in the tech world. In early 2013 he won a \$1 million grant from TED, the global ideas conference, to pursue his work. He’s now in the process of establishing seven “schools in the cloud,” five in India and two in the UK. In India, most of his schools are single-room buildings. There will be no teachers, curriculum, or separation into age groups—just six or so computers and a woman to look after the kids’ safety. His defining principle: “The children are completely in charge.”

“THE BOTTOM LINE IS, IF YOU’RE NOT THE ONE CONTROLLING YOUR LEARNING, YOU’RE NOT GOING TO LEARN AS WELL.”

Mitra argues that the information revolution has enabled a style of learning that wasn’t possible before. The exterior of his schools will be mostly glass, so outsiders can peer in. Inside, students will gather in groups around computers and research topics that interest

them. He has also recruited a group of retired British teachers who will appear occasionally on large wall screens via Skype, encouraging students to investigate their ideas—a process Mitra believes best fosters learning. He calls them the Granny Cloud. “They’ll be life-size, on two walls” Mitra says. “And the children can always turn them off.”

Mitra’s work has roots in educational practices dating back to Socrates. Theorists from Johann Heinrich Pestalozzi to Jean Piaget and Maria Montessori have argued that students should learn by playing and following their curiosity. Einstein spent a year at a Pestalozzi-inspired school in the mid-1890s, and he later credited it with giving him the freedom to begin his first thought experiments on the theory of relativity. Google founders Larry Page and Sergey Brin similarly claim that their Montessori schooling imbued them with a spirit of independence and creativity.

In recent years, researchers have begun backing up those theories with evidence. In a 2011 study, scientists at the University of Illinois at Urbana-Champaign and the University of Iowa scanned the brain activity of 16 people sitting in front of a computer screen. The screen was blurred out except for a small, movable square through which subjects could glimpse objects laid out on a grid. Half the time, the subjects controlled the square window, allowing them to determine the pace at which they examined the objects; the rest of the time, they watched a replay of someone else moving the window. The study found that when the subjects controlled their own observations, they exhibited more coordination between the hippocampus and other parts of the brain involved in learning and posted a 23 percent improvement in their ability to remember objects. “The bottom line is, if you’re not the one who’s controlling your learning, you’re not going to learn as well,” says lead researcher Joel Voss, now a neuroscientist at Northwestern University.

In 2009, scientists from the University of Louisville and MIT’s Department of Brain and Cognitive Sciences conducted a study of 48 children between the ages of 3 and 6. The kids were presented with a toy that could squeak, play notes, and reflect images, among other things. For one set of children, a researcher demonstrated a single attribute and then let them play with the toy. Another set of students was given no information about the toy. This group played longer and discovered an average of six attributes of the toy; the group that was told what to do discovered only about four. A similar study at UC Berkeley demonstrated that kids given no instruction were much more likely to come up with novel solutions to a problem. “The science is brand-new, but it’s not as if people didn’t have this intuition before,” says coauthor Alison Gopnik, a professor of psychology at UC Berkeley.

Gopnik's research is informed in part by advances in artificial intelligence. If you program a robot's every movement, she says, it can't adapt to anything unexpected. But when scientists build machines that are programmed to try a variety of motions and learn from mistakes, the robots become far more adaptable and skilled. The same principle applies to children, she says.

A BRIEF HISTORY OF ALTERNATIVE SCHOOLS

New research shows what educators have long intuited: Letting kids pursue their own interests sharpens their hunger for knowledge. Here's a look back at this approach.

—Jason Kehe



470 BC

Socrates is born in Athens. He goes on to become a long-haired teacher who famously let students arrive at their own conclusions. His questioning, probing approach—the Socratic method—endures to this day.



1907

Maria Montessori opens her first Children's House in Rome, where kids are encouraged to play and teach themselves. Americans later visit her schools and see the Montessori method in action. It spreads worldwide.



1919

The first Waldorf school opens in Stuttgart, Germany. Based on the ideas of philosopher Rudolf Steiner, it encourages self-motivated learning. Today, there are more than 1,000 in 60 countries.



1921

A. S. Neill founds the Summerhill School, where kids have the “freedom to go to lessons or stay away, freedom to play for days ... or years if necessary.” Eventually, such democratic schools appear around the world.





1945

Loris Malaguzzi volunteers to teach in a school that parents are building in a war-torn Italian village outside Reggio Emilia. The “Reggio Emilia approach”—a community of self-guided learning—is born.



1967

Seymour Papert, a protégé of child psychologist Jean Piaget, helps create the first version of Logo, a programming language kids can use to teach themselves. He becomes a lifelong advocate for technology’s role in learning.



1999

Sugata Mitra conducts his first “hole in the wall” experiment in New Delhi, India. On their own, slum kids teach themselves to use a computer. Mitra dubs his approach minimally invasive education.



2006

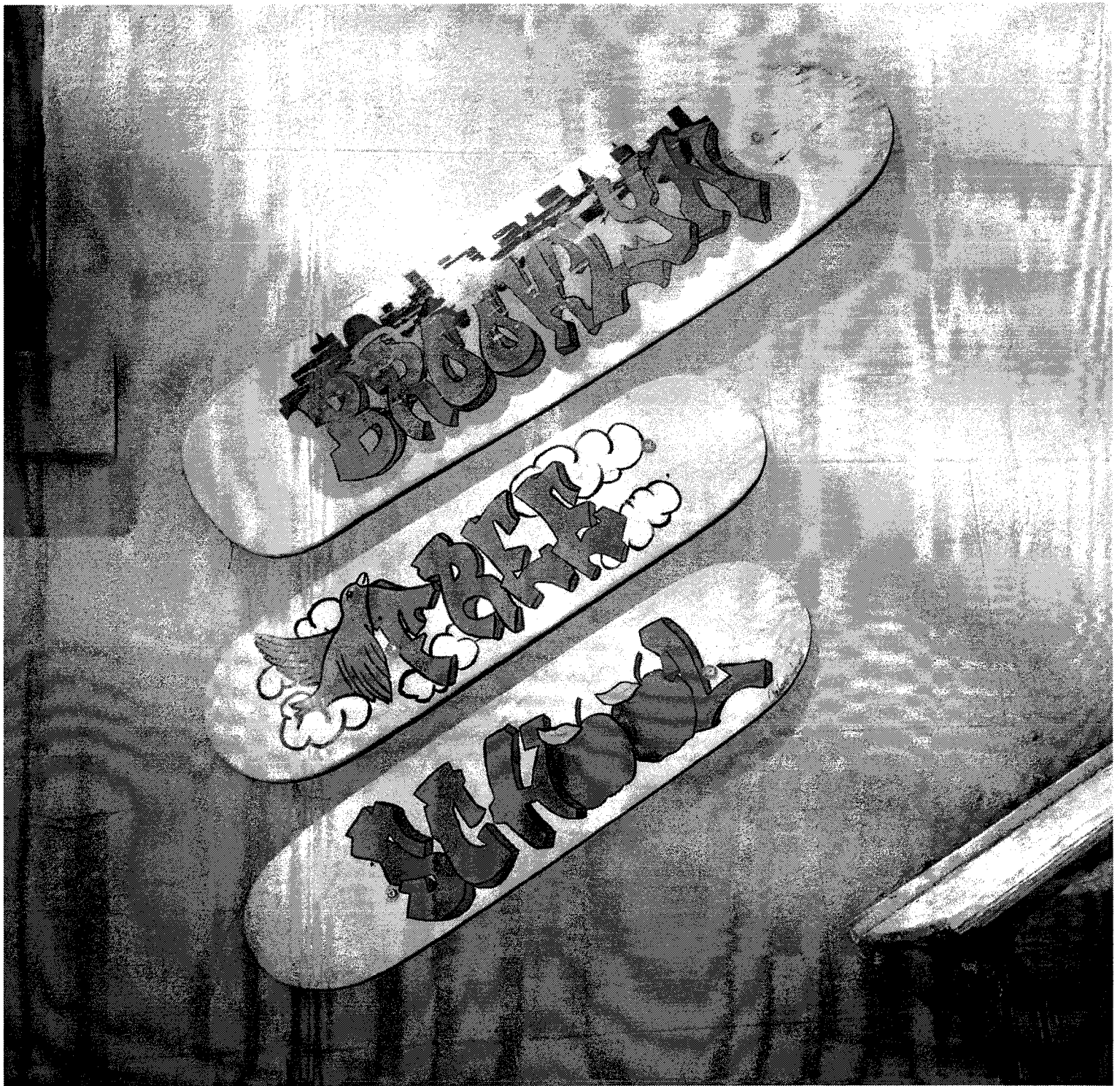
Ken Robinson gives what will become the most frequently viewed TED Talk ever: Students should be free to make mistakes and pursue their own creative interests, Robinson argues.



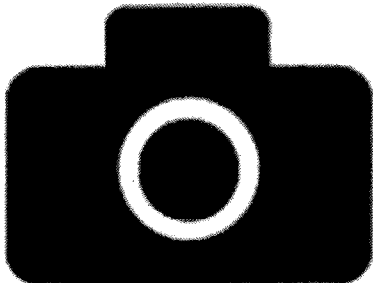
2012

The Common Core, a new set of curriculum standards that include student-centered learning, is adopted by 45 US states. Math students, say, should “start by explaining to themselves the meaning of a problem.”

CREDITS: Waldorf School: courtesy of Waldorf School; Robinson: Robert Leslie; Malaguzzi: courtesy of Reggio Children; remaining: Getty Images



Students at Brooklyn Free School direct their own learning. There are no grades or formal assignments.



Brian Finke

Evolutionary psychologists have also begun exploring this way of thinking. Peter Gray, a research professor at Boston College who studies children's natural ways of learning, argues that human cognitive machinery is fundamentally incompatible with conventional schooling. Gray points out that young children, motivated by curiosity and playfulness, teach themselves a tremendous amount about the world. And yet when they reach school age, we supplant that innate drive to learn with an imposed curriculum. "We're teaching the child that his questions don't matter, that what matters are the questions of the curriculum. That's just not the way natural selection designed us to learn. It designed us to solve problems and figure things out that are part of our real lives."

Some school systems have begun to adapt to this new philosophy—with outsize results. In the 1990s, Finland pared the country's elementary math curriculum from about 25 pages to four, reduced the school day by an hour, and focused on independence and active learning. By 2003, Finnish students had climbed from the lower rungs of international performance rankings to first place among developed nations.

Nicholas Negroponte, cofounder of the MIT Media Lab, is taking this approach even further with his One Laptop per Child initiative. Last year the organization delivered 40 tablets to children in two remote villages in Ethiopia. Negroponte's team didn't explain how the devices work or even open the boxes. Nonetheless, the children soon learned to play back the alphabet song and taught themselves to write letters. They also figured out how to use the tablet's camera. This was impressive because the organization had disabled camera usage. "They hacked Android," Negroponte says.

One day Juárez Correa went to his whiteboard and wrote "1 = 1.00." Normally, at this point, he would start explaining the concept of fractions and decimals. Instead he just wrote " $\frac{1}{2} = ?$ " and " $\frac{1}{4} = ?$ "

"Think about that for a second," he said, and walked out of the room.

While the kids murmured, Juárez Correa went to the school cafeteria, where children could buy breakfast and lunch for small change. He borrowed about 10 pesos in coins, worth about 75 cents, and walked back to his classroom, where he distributed a peso's worth of coins to each table. He noticed that Paloma had already written .50 and .25 on a piece of paper.

"One peso is one peso," he said. "What's one-half?"

JUÁREZ CORREA FELT A CHILL. HE HAD NEVER ENCOUNTERED A STUDENT WITH PALOMA'S LEVEL OF INNATE ABILITY.

At first a number of kids divided the coins into clearly unequal piles. It sparked a debate among the students about what one-half meant. Juárez Correa's training told him to intervene. But now he remembered Mitra's research and resisted the urge. Instead, he watched as Alma Delia Juárez Flores explained to her tablemates that half means equal portions. She counted out 50 centavos. "So the answer is .50," she said. The other kids nodded. It made sense.

For Juárez Correa it was simultaneously thrilling and a bit scary. In Finland, teachers underwent years of training to learn how to orchestrate this new style of learning; he was winging it. He began experimenting with different ways of posing open-ended questions on subjects ranging from the volume of cubes to multiplying fractions. "The volume of a square-based prism is the area of the base times the height. The volume of a square-based pyramid is that formula divided by three," he said one morning. "Why do you think that is?"

He walked around the room, saying little. It was fascinating to watch the kids approach the answer. They were working in teams and had models of various shapes to look at and play with. The team led by Usiel Lemus Aquino, a short boy with an ever-present hopeful expression, hit on the idea of drawing the different shapes—prisms and pyramids. By layering the drawings on top of each other, they began to divine the answer. Juárez Correa let the kids talk freely. It was a noisy, slightly chaotic environment—exactly the opposite of the sort of factory-friendly discipline that teachers were expected to impose. But within 20 minutes, they had come up with the answer.

"Three pyramids fit in one prism," Usiel observed, speaking for the group. "So the volume of a pyramid must be the volume of a prism divided by three."

Juárez Correa was impressed. But he was even more intrigued by Paloma. During these experiments, he noticed that she almost always came up with the answer immediately. Sometimes she explained things to her tablemates, other times she kept the answer to

herself. Nobody had told him that she had an unusual gift. Yet even when he gave the class difficult questions, she quickly jotted down the answers. To test her limits, he challenged the class with a problem he was sure would stump her. He told the story of Carl Friedrich Gauss, the famous German mathematician, who was born in 1777.

When Gauss was a schoolboy, one of his teachers asked the class to add up every number between 1 and 100. It was supposed to take an hour, but Gauss had the answer almost instantly.

“Does anyone know how he did this?” Juárez Correa asked.

A few students started trying to add up the numbers and soon realized it would take a long time. Paloma, working with her group, carefully wrote out a few sequences and looked at them for a moment. Then she raised her hand.

“The answer is 5,050,” she said. “There are 50 pairs of 101.”

Juárez Correa felt a chill. He’d never encountered a student with so much innate ability. He squatted next to her and asked why she hadn’t expressed much interest in math in the past, since she was clearly good at it.

“Because no one made it this interesting,” she said.

OUR EDUCATIONAL SYSTEM IS ROOTED IN THE INDUSTRIAL AGE. IT VALUES PUNCTUALITY, ATTENDANCE, AND SILENCE ABOVE ALL ELSE.

Paloma’s father got sicker. He continued working, but he was running a fever and suffering headaches. Finally he was admitted to the hospital, where his condition deteriorated; on February 27, 2012, he died of lung cancer. On Paloma’s last visit before he passed away, she sat beside him and held his hand. “You are a smart girl,” he said. “Study and make me proud.”

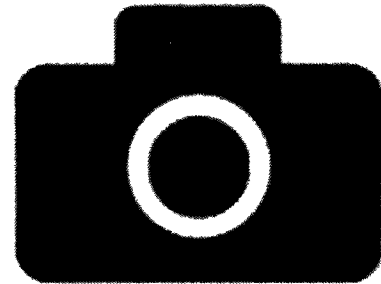
Paloma missed four days of school for the funeral before returning to class. Her friends could tell she was distraught, but she buried her grief. She wanted to live up to her father’s last wish. And Juárez Correa’s new style of curating challenges for the kids was

the perfect refuge for her. As he continued to relinquish control, Paloma took on more responsibility for her own education. He taught the kids about democracy by letting them elect leaders who would decide how to run the class and address discipline. The children elected five representatives, including Paloma and Usiel. When two boys got into a shoving match, the representatives admonished the boys, and the problem didn't happen again.

Juárez Correa spent his nights watching education videos. He read polemics by the Mexican cartoonist Eduardo del Río (known as Rius), who argued that kids should be free to explore whatever they want. He was also still impressed by Mitra, who talks about letting children “wander aimlessly around ideas.” Juárez Correa began hosting regular debates in class, and he didn't shy away from controversial topics. He asked the kids if they thought homosexuality and abortion should be permitted. He asked them to figure out what the Mexican government should do, if anything, about immigration to the US. Once he asked a question, he would stand back and let them engage one another.

A key component in Mitra's theory was that children could learn by having access to the web, but that wasn't easy for Juárez Correa's students. The state paid for a technology instructor who visited each class once a week, but he didn't have much technology to demonstrate. Instead, he had a batch of posters depicting keyboards, joysticks, and 3.5-inch floppy disks. He would hold the posters up and say things like, “This is a keyboard. You use it to type.”

As a result, Juárez Correa became a slow-motion conduit to the Internet. When the kids wanted to know why we see only one side of the moon, for example, he went home, Googled it, and brought back an explanation the next day. When they asked specific questions about eclipses and the equinox, he told them he'd figure it out and report back.



Sugata Mitra's research on student-led learning inspired Juárez Correa.

Mark Pinder

Juárez Correa also brought something else back from the Internet. It was the fable of a forlorn burro trapped at the bottom of a well. Since thieves had broken into the school and sliced the electrical cord off of the classroom projector (presumably to sell the copper inside), he couldn't actually show them the clip that recounted the tale. Instead, he simply described it.

One day, a burro fell into a well, Juárez Correa began. It wasn't hurt, but it couldn't get out. The burro's owner decided that the aged beast wasn't worth saving, and since the well was dry, he would just bury both. He began to shovel clods of earth into the well. The burro cried out, but the man kept shoveling. Eventually, the burro fell silent. The man

assumed the animal was dead, so he was amazed when, after a lot of shoveling, the burro leaped out of the well. It had shaken off each clump of dirt and stepped up the steadily rising mound until it was able to jump out.

Juárez Correa looked at his class. “We are like that burro,” he said. “Everything that is thrown at us is an opportunity to rise out of the well we are in.”

When the two-day national standardized exam took place in June 2012, Juárez Correa viewed it as just another pile of dirt thrown on the kids’ heads. It was a step back to the way school used to be for them: mechanical and boring. To prevent cheating, a coordinator from the Ministry of Education oversaw the proceedings and took custody of the answer sheets at the end of testing. It felt like a military exercise, but as the kids blasted through the questions, they couldn’t help noticing that it felt easy, as if they were being asked to do something very basic.

Ricardo Zavala Hernandez, assistant principal at José Urbina López, drinks a cup of coffee most mornings as he browses the web in the admin building, a cement structure that houses the school’s two functioning computers. One day in September 2012, he clicked on the site for ENLACE, Mexico’s national achievement exam, and discovered that the results of the June test had been posted.

Zavala Hernandez put down his coffee. Most of the classes had done marginally better this year—but Paloma’s grade was another story. The previous year, 45 percent had essentially failed the math section, and 31 percent had failed Spanish. This time only 7 percent failed math and 3.5 percent failed Spanish. And while none had posted an Excellent score before, 63 percent were now in that category in math.

The language scores were very high. Even the lowest was well above the national average. Then he noticed the math scores. The top score in Juárez Correa’s class was 921. Zavala Hernandez looked over at the top score in the state: It was 921. When he saw the next box over, the hairs on his arms stood up. The top score in the entire country was also 921.

He printed the page and speed-walked to Juárez Correa’s classroom. The students stood up when he entered.

“Take a look at this,” Zavala Hernandez said, handing him the printout.

Juárez Correa examined the results and looked down. “This is wonderful!” he said.

Juárez Correa scanned the results and looked up. “Is this for real?” he asked.

“I just printed it off the ENLACE site,” the assistant principal responded. “It’s real.”

Juárez Correa noticed the kids staring at him, but he wanted to make sure he understood the report. He took a moment to read it again, nodded, and turned to the kids.

“We have the results back from the ENLACE exam,” he said. “It’s just a test, and not a great one.”

A number of students had a sinking feeling. They must have blown it.

“But we have a student in this classroom who placed first in Mexico,” he said, breaking into a smile.

Paloma received the highest math score in the country, but the other students weren’t far behind. Ten got math scores that placed them in the 99.99th percentile. Three of them placed at the same high level in Spanish. The results attracted a quick burst of official and media attention in Mexico, most of which focused on Paloma. She was flown to Mexico City to appear on a popular TV show and received a variety of gifts, from a laptop to a bicycle.

Juárez Correa himself got almost no recognition, despite the fact that nearly half of his class had performed at a world-class level and that even the lowest performers had markedly improved.

His other students were congratulated by friends and family. The parents of Carlos Rodríguez Lamas, who placed in the 99.99th percentile in math, treated him to three steak tacos. It was his first time in a restaurant. Keila Francisco Rodríguez got 10 pesos from her parents. She bought a bag of Cheetos. The kids were excited. They talked about being doctors, teachers, and politicians.

Juárez Correa had mixed feelings about the test. His students had succeeded because he had employed a new teaching method, one better suited to the way children learn. It was a model that emphasized group work, competition, creativity, and a student-led environment. So it was ironic that the kids had distinguished themselves because of a conventional multiple-choice test. “These exams are like limits for the teachers,” he says. “They test what you know, not what you can do, and I am more interested in what my students can do.”

Like Juárez Correa, many education innovators are succeeding outside the mainstream. For example, the 11 Internationals Network high schools in New York City report a higher graduation rate than the city's average for the same populations. They do it by emphasizing student-led learning and collaboration. At the coalition of Big Picture Learning schools—56 schools across the US and another 64 around the world—teachers serve as advisers, suggesting topics of interest; students also work with mentors from business and the community, who help guide them into internships. As the US on-time high school graduation rate stalls at about 75 percent, Big Picture is graduating more than 90 percent of its students.

But these examples—involving only thousands of students—are the exceptions to the rule. The system as a whole educates millions and is slow to recognize or adopt successful innovation. It's a system that was constructed almost two centuries ago to meet the needs of the industrial age. Now that our society and economy have evolved beyond that era, our schools must also be reinvented.

For the time being, we can see what the future looks like in places like Juárez Correa's classroom. We can also see that change will not come easily. Though Juárez Correa's class posted impressive results, they inspired little change. Francisco Sánchez Salazar, chief of the Regional Center of Educational Development in Matamoros, was even dismissive. "The teaching method makes little difference," he says. Nor does he believe that the students' success warrants any additional help. "Intelligence comes from necessity," he says. "They succeed without having resources."

More than ever, Juárez Correa felt like the burro in the story. But then he remembered Paloma. She had lost her father and was growing up on the edge of a garbage dump. Under normal circumstances, her prospects would be limited. But like the burro, she was shaking off the clods of dirt; she had begun climbing the rising mound out of the well.

Want to help teachers like Sergio Juárez Correa make a difference? Here's how you can

WHERE THE RADICAL SCHOOLS ARE NOW

Some schools are finding new ways for technology to fuel students' curiosity so they can steer their own learning. — J.K.



Brooklyn Free School

Founded just under a decade ago, the Brooklyn Free School builds on a tradition of democratic education. In this “real, practicing democracy,” students are allowed to direct their own learning. There are no grades or mandatory assignments.

New Technology High School

No desks, no bells, and teachers who lecture by invitation: pretty much what you'd expect of a school dreamed up by Silicon Valley types. Students at this school in Napa, California, must demonstrate technology literacy, mastering skills like digital video production and Flash programming.

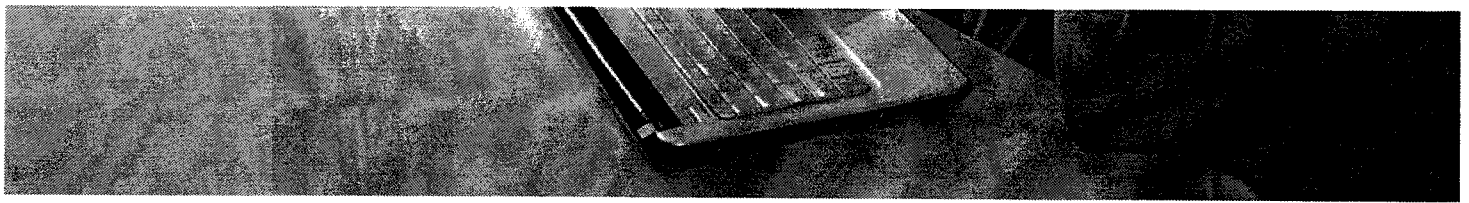
NYC iSchool

Laptop-toting students at this small school in Manhattan participate in an “online collaborative space” in which they interact with teachers and experts. And not just any experts: A NASA scientist and other luminaries have delivered lectures remotely.

High Tech High

Originally a single charter school in San Diego, High Tech High is now a 12-school network that serves more than 5,000 K-12 students. With access to sleek facilities—including labs for subjects like biotech, mechanical engineering, and graphic design—students develop multimedia research projects, consult with experts, and even present their work in professional venues.





Mooreville Graded School District

The eight schools in this district outside Charlotte, North Carolina, provide students from the fourth through twelfth grades with MacBook Airs. That means less lecturing and more projects, with students seeking answers online and sharing their discoveries with one another.

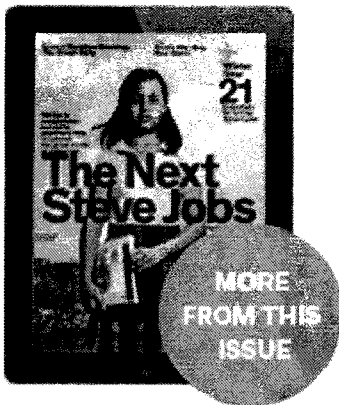
School of One

Multiple skills are taught at the same time in different parts of open-space classrooms in New York City. The program's approach blends traditional lectures with computer exercises and virtual tutors, and a learning algorithm generates a daily plan for each student.

Cloud Schools

Being developed in India and England, cloud schools are education maverick Sugata Mitra's vision for the future: spaces in which children learn on their own, with occasional encouragement from teachers via Skype.

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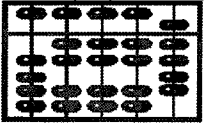
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ATTACH. 2

Advantages of the one-room schoolhouse approach to teaching

A neglected but extremely efficient approach

Teaching a class containing both advanced and beginning students can be extremely challenging, but, if managed well, can be far more effective than the traditional class in which students of equal experience and ability are grouped together. The latter approach, much like the mass production assembly line, requires far less effort and expertise on the part of the teacher than one that takes advantage of differing student abilities and learning styles. De-skilling the teachers' job description by having them specialize in and repeat the same material year-after-year to an endless series of tenth graders is demeaning, both to the inspired educator and to the enthusiastic student, and is ultimately counter-productive if our goal is truly education and not simply compliance and conformity.

Mass-production education produces mass-production results. There is a better way.

The standard high school or college class containing 30 or so students at the same level has some serious limitations. The teacher, faced with covering the same material year after year, easily falls into a repetitive pattern which frequently fails to do justice to an ever-expanding subject and to the educational process itself. Such an approach can become extremely stultifying if the instructor does not take care to invent, research, and improvise. Unfortunately, this is the only type of teaching that most people know, and it is **not** one that works well in an educational environment in which a teacher has students with varied experience and abilities. A common mistake is to split a group of heterogeneous students into grade levels in order to apply mass production techniques. This is a grave error, as a mixed age and ability class has so much potential for students of all levels as well as for the talented teacher.

It is always possible to convert classes of stratified grade levels into heterogeneous-level classes and there are certainly some small-scale learning environments which can be handled in no other way. A collaborative homeschooling system, for example, more closely approximates the old one-room schoolhouse – English students ranging in age from 8 to 18, or a music class with some students just touching a piano for the first

time, and others with 12 years of piano lessons — a language class or martial arts class with all levels of proficiency, even a randomly collected online education group class. If such classes were treated with the assembly-line approach, learning would be reduced to plodding stepwise progress and more advanced students would leave, given the option, to seek something more challenging. Taught differently, however, it can be a very effective learning scenario.

How to work with multiple levels to best advantage

There are many wonderful ways to take advantage of a wide disparity of abilities in a classroom and nearly everyone can learn more, faster, and more enjoyably than in a traditional classroom of students with similar abilities. It is absolutely impossible to accomplish much in this environment if one is limited to having everyone do exactly the same thing as everyone else all the time.

A simple example from a music keyboard theory class: one can give an advanced student a melody he has never seen and have him play it with variations in realtime, improvising the harmony as he goes along. Intermediate students can then be asked to analyze and identify what was just done and, with the help of the advanced student, try to emulate it. Then the beginning students can simply practice recognizing and playing the chords as recited to them by intermediate students.

A solution for both advanced and beginning students

It is critical for the advanced student to be able to practice the art at a high level. It is extremely valuable for newer students to be able to see the art practiced by an artist, to discuss, ask questions, and emulate. It is also essential for students at all levels to learn to teach as well as to perform. None of this is possible in a homogeneous classroom and only basics are possible if everyone is expected to do exactly the same thing.

Many subjects work very well using this approach — language study, theater, art, science, mathematics, martial arts — though the teacher may have to do some very creative thinking. Admittedly, beginning language or mathematics students are likely to be perplexed by more advanced topics, but this is not altogether bad. That exposure can plant amazing seeds that can work wonders in the long term, and the potential inspiration of seeing skills applied at a high level should not be underestimated. It is also quite a different experience to watch a renowned expert expound on stage, film, or at the podium and to see one's own classmate practice the art right before one's eyes. The latter can be an extremely moving experience.

An inspired teacher is required, but what talented teacher would not want that opportunity?

Multi-level classes can rarely be made to follow a textbook or planned curriculum. This puts the onus upon the teacher to provide cogent material for students at all levels and to respond to any possible student question. With the Internet, this is much easier than it used to be, and, as always, more advanced students can benefit from seeking out and presenting material to less advanced ones. The teacher must also be prepared to challenge the highest level students as well as the beginner.

Here are some suggestions, a checklist for optimizing student interest, retention, and progress in a mixed-ability classroom:

- **Warm ups:** This can be defined as any activity that is present at the beginning of every class in some subjects. Whether singing gradually ascending arpeggios, limbering up joints and muscles, or

reiterating safety regulations, warm ups should never take too much class time, and certainly not the major part of it. To the lazy teacher, they are a temptation, a convenient way to eat up class time. Warm ups should be varied, brief, and if possible, interesting. There are often ways to improve the time-efficiency of many parts of a warm up by combining procedures.

- **Review and reinforcement:** recently introduced concepts, devices, and techniques should be repeated as necessary to reinforce them. Too much or too little review either wastes time in the current class, or wastes time time spent learning the subject for the first time in a previous class.
- **New material:** Every class should see something new, something that has not been seen in the past six months, a year, or more. In every subject there is so much to draw from, and so often aspects of the subject are neglected by even the best teacher and the best text. An effort should always be made to find these and cover them — if only to explain why they are being omitted.
- **Expert time:** There should always be time in every class for advanced students to practice, demonstrate their skills, and to be observed by beginning and intermediate students (especially if there are classroom visitors and recruitment is a goal). It reminds us all why we are practicing and where our efforts can lead. So often advanced practitioners in a field who are working with newer students much of the time are not challenged to achieve more. They need to expand their art too, and seeing that benefits the entire class.
- **Open practice time:** When specialized equipment is involved, whether it is software, laboratory equipment, exercise equipment, or musical instruments, students need time to work on their own — not necessarily without supervision, but certainly without a lock-step regimen that must be followed. It is amazing what new minds and eyes can see that is missed by those who have acquired preconceived limitations.
- **Learning to teach:** Learning how to teach as well as to perform should reasonably be part of any curriculum, particularly when teaching is the ultimate goal, but even when it isn't. Student teaching is really always a part of a multi-level classroom.

The problem is that people who have gone through our standard school system, and adopted our age's mass-production paradigm, know only one way to teach. It has been shown time after time that it is perfectly feasible to learn at a much faster pace than that possible given the traditional grade-level classroom approach — and to enjoy the process more, which in turn engenders enthusiasm, dedication, and progress. Many collaborative-homeschool students have started taking college classes at age 10 or 11 and have done very well. This kind of thing happens only rarely in standard grade-level classes, but such classes can always be reorganized into multilevel classrooms, at least on a part-time basis, if teachers are willing to relinquish the comfort and ease of predefined, textbook-oriented mass-production education.

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"For if you [the rulers] suffer your people to be ill-educated, and their manners to be corrupted from their infancy, and then punish them for those crimes to which their first education disposed them, what else is to be concluded from this, but that you first make thieves [outlaws] and then punish them."

- Sir Thomas More (1478-1535), Utopia, Book 1

Would you first break the legs of a lamb and then kick it because it could not stand up thereafter?

We are now witnessing the accumulating negative effects of omitting the three means of learning how to learn which constitute the integrated, Classical Trivium - the first three of the Seven Liberal Arts and Sciences; the last four constituents are called the Quadrivium.

In a Classical Primary and Secondary Education curriculum, the components of the Trivium - general grammar, formal (Aristotelian) logic, and classical rhetoric - are presented to students to train them in learning how to learn and, concurrently, in validly thinking systematically.

The Trivium is presented to methodically gather raw, factual data into a coherent body of knowledge (grammar); then to gain understanding of that body by systematically eliminating all stated contradictions within it (dialectic or logic); and, finally, to wisely express and utilize that valid knowledge and understanding in the objective, real world (rhetoric)

Once a student is conversant with this three-fold procedural pattern, he is now capable - and this is one of the great values of the Trivium - of teaching himself, with minimal guidance from an instructor or facilitator, how to learn any established subject such as mathematics, geometry, musical theory, astronomy (the Classical Quadrivium), physics, chemistry, history, philosophy, etc.; or of fully grasping any propositional topic he is motivated upon which to focus - like current socio/political issues, newly developing scientific hypotheses, historical and literary analyses, and so forth. In other words, through the process of learning how to learn, he learns how to critically and creatively think . . . for himself. That last sentence sums up the process.

The first aspect of systematic thinking is to learn the elements of a proposition or subject in order to critically define a problem or an opportunity (this is done in the grammar and logic stages). Once defined, we use our creative thought capacity to solve the problem or find ways to take advantage of the opportunity (the classical rhetorical mode accomplishes this task).

This makes a person a first-hand, independent thinker rather than remaining a second-hand, dependent thinker. In not relying on his own organized thoughts, a second-hand thinker (usually one marked by low self-esteem) has his mental content filled by various so called authorities like the mass media and its advertising; professionals and politicians, some of whom may be unscrupulous; officials, both benign and despotic, in schools and in the work place.

The first-hand mode - the Trivium pattern of organization - is in fact the way the human mind would naturally order itself for effective thinking if this process were not aggressively discouraged by various entrenched factions in society - those self-perceived and self-proclaimed guardians of convention. To state the process in its simplest form, the 3 steps in order answer the 5W's + How to identify knowledge

and how it's inter-related in context of its surroundings, producing objective and verifiable understanding:

1. Grammar (Knowledge of that which exists)

a. Answers the question of the Who, What, Where, and the When of a subject.

2. Logic (Understanding of the interrelationships of that which exists)

a. Answers the Why of a subject.

3. Rhetoric (Communication of Grammar and Logic)

a. Provides the How of a subject.

A major reason the one-roomed school house of the past (being taught by one instructor and upper classmen) and the home schooling movement now gaining traction was and is successful is that they use(d) the Trivium Method of Education.

Success, in this context, is in producing appropriately critical, creative, self-sufficient individuals who become equipped to attract intellectual abundance into their lives as well as that which naturally follows from it - material abundance in moderation, not in excess.

If a person has not been exposed to this method, it is difficult to communicate to him the serenity-of-mind and self-assurance (i.e., the spiritual abundance) caused by this competence to appropriately validate one's own thinking as well as the thinking and doctrines of others. (It must be experienced)

No amount of personal counseling or therapy can generate the self-esteem of having the ability to orient one's body and mind in the world through what is his most distinguishing attribute: that of his own rational thinking applied in a systematic manner. The pattern of the Trivium is the foundation of this system which produces an intuitive means to learn new material, not only during periods devoted to formal instruction, but over an entire lifetime.

As the study and practice of music allow the hands to intuitively and immediately produce melody on a piano, for instance, so the study and practice of the Trivium produces intuitive and immediate critical/creative thought. In being the method to know a subject rather than only to study a subject, it is truly the most fundamental preparation for the leading of a successful life - a gift every child, adolescent, and adult should be presented to elevate him to the dignity of self-determination.

It is stressed, the Trivium forms a habitual and methodological pattern-of-mind of how to think effectively, not what to think. It gives one's mind an ever-improving map, which corresponds to the terrain, and is always improving itself; for the purposes of your survival and satisfaction in life.

As an added bonus, this is a serene pursuit. Because this is a method devoted to the "how" of thinking, it is not controversial. It is in the topics of "what" to think - religion, literature, philosophy, and modern science - where controversy reigns.

The problem is, "General Education" has not been the focus of the contemporary schooling establishment but, rather, social engineering . . . it is a vile and protracted form of mis-education.

After adopting the Prussian Education Method (see addendum) in America in the middle to late-19th century, this fault in educating our nation, from the perspective of the general citizenry, was compounded by applying the dangerous tenets of the Pragmatic Philosophy devised by William James and John Dewey (I recommend an internet word search on each of italicized terms in this paragraph). The "party

line" is that children need to be surrounded by their peers in order to socialize properly in preparing them for life. Socialization is a natural process to people, it need not be taught to them; or, more to the point, programmed in them.

Children need to be around family, neighbors, and a few close, genuine friends when younger; and participants in church, social, civic, and charitable organizations in adolescence. Friends and organizations just described have their time and place in a young persons' life - they are not all-consuming intrusions as modern primary and secondary schooling establishments try to make themselves.

There are self-serving, domineering social entities which perceive a gain from having general populations presented with only the protocols of a field of study and to have withheld the rationale of that field of study. The knowledge of the rationale of subjects for understanding, and the protocols for the expression or application of those subjects comprises what is addressed in a "General Education".

The "rationale" provides the all-important understanding as to why a subject or proposition is integrated and self-intelligible by presenting the entire thought process (the validated arguments) behind the rationale's conclusions. The "protocol" is a set of instructions spawned by that consolidated understanding (of the rationale) with which to manifest an expressed outcome.

By presenting only protocols, outcome-based education (which is, in reality, mind control or "programming") is the openly stated goal of public schooling, not general, understanding-based education. Our country is populated by the products of this policy of having "only" protocols presented and committed to memory. These "products" are designed to be obedient soldiers, pliable employees, imprudent consumers of goods and services, and otherwise uncritical servants of established corporate and statist interests.

In not being trained to think critically and creatively, students are programmed in reading and thinking only to the level of abiding to instructions (e.g., reading a procedural manual or slavishly following edicts from "on high" issued by so called authorities).

Unfortunately, this is a mind numbing action which becomes insidiously habituated. To be under the rule of task masters; to be dictated as to what to think by others or via the media; to labor under the illusion of being a well-informed individual; to become a stillborn adult, a life-long adolescent - these are the results of our century old institution. The ideal of self-determination is trampled mercilessly and in its place grows self-alienation. In being aggressively indoctrinated not to think . . . that is, in being programmed against our very nature, is it any wonder most of us live in a constant state of low-level fear and are anxiously disoriented in an ocean of chaos without the ability to judge as to what are appropriate and beneficial goods and values? Man cannot long live or maintain health without his primary means of survival; the exercise of his rational thought.

If one is trained in the use of the Trivium Method, not only can he learn topics on his own; deduce particular rationale from particular protocols (and, of course, the inverse); but also develop intellectual and value judgment of a high order. Through the efficient attainment of knowledge and understanding, one's intellectual capacities are awakened. He will be comfortable at all levels of intellect - lower, higher, and subtle. He can look at the world, or anything else, with clarity and discernment.

Then he can act accordingly and with assurance. Said simply, he can thrive in the living of life. One of several tests to show if an individual is reaching this awakened state of education is when he can thoroughly and critically entertain various ideas without necessarily embracing them (i.e., he comes into possession of a truly open mind: he frees himself from his own opinions and prejudices). The nature of some other tests is quite surprising (those will be discussed elsewhere).

Because of the universality of its application, the Trivium, as it has for the last six millennia (at minimum), provides its adherents effectiveness in responding to most questions and situations encountered in life.

The Liberating Arts, Books, and a Free Mind (Liber, n. = Book, Liber, v. = Free)

The Trivium is comprised of: [1] General Grammar,[2] Formal Logic,[3] Classical Rhetoric
The Quadrivium is comprised of: [4] Arithmetic,[5] Geometry,[6] Music, and [7] Astronomy.

The Trivium and Quadrivium comprise the 7 Liberal Arts.

The Trivium (which pertains to Mind)- the elementary three, which means: "where three roads meet", those "roads" being a metaphor to describe: Grammar, Logic, and Rhetoric; in that specific order.

[1] **GRAMMAR** (discovering and ordering facts of reality comprises basic, systematic Knowledge)- not only the rules developed and applied to the ordering of word/concepts for verbal expression and communication, but our first contact with conscious order as such. This is the initial, self-conscious technique used in properly (discursively or sequentially) organizing a body of knowledge from raw, factual data for the purpose of gaining understanding (through logic) and; thus, also organizing the individual human mind. It is the foundation upon which all other "methods of organization and order" are built. Special grammar properly relates words to other words within a specified language like English, Russian, or Latin. General grammar relates words to objective reality in any language and applies to all subjects as the first set of building blocks to integrated or fully mindful, objective knowledge. A body of knowledge which has been gathered and arranged under the rules of general grammar can now be subjected to logic for full understanding, which, emphatically, is a separate intellectual procedure.

[2] **LOGIC** (developing the faculty of reason in establishing valid [i.e., non-contradictory] relationships among facts yields basic, systematic Understanding) it is a guide for thinking correctly; thinking without contradiction. More concisely, it is the art of non-contradictory identification. The work of logic is proof. Proof consists of establishing the truth and validity of a concept or proposition in correspondence with objective, factual reality by following a self-consistent chain of higher-level thought back down to foundational, primary concepts or axioms (i.e., Existence, Consciousness, and Causality). It is a means of keeping us in touch and grounded to objective reality in our search for valid knowledge and understanding. Logic brings the rhythm of the subjective thoughts of the mind, and the subsequent actions of the body, into harmony with the rhythm of the objective universe.

[3] **RHETORIC** (applying knowledge and understanding expressively comprises Wisdom or, in other words, it is systematically useable knowledge and understanding)-to explore and find the proper choice of methods for cogently expressing the conclusions of grammar and logic on a subject in writing and/or oral argumentation (oratory). The annunciation of those conclusions is called a statement of rationale; the set of instructions deduced from the rationale for the purpose of application (of those conclusions) in the real world is called a statement of protocols.

THE SYSTEM: 1] Discovering and arranging Knowledge (a body of knowledge) under general grammar; 2] fully Understanding that Knowledge under formal logic; and 3] Wisely expressing and using that Knowledge and Understanding under classical rhetoric, are three distinctly different but inter-related disciplines which yield, when applied as an integrated unit - - Objective, Verifiable, Truth.

ESSENTIAL TERMS

1. **Existence**- Every entity, action, attribute, and relationship that is, was, or ever will be.
 - a. This definition describes every noun, adjective, verb, etc. in the English language.
 - i. It encompasses all word-related concepts in objective reality.
2. **Identity**- That which an existent is; the sum total of its attributes or characteristics.
 - a. As opposed to that which does not exist, the arbitrary and un-substantial.
3. **Consciousness**- The faculty of awareness of that which exists.
 - a. **Questions, i.e.** "thinking" is the sign of consciousness in human beings.
 - i. **Descartes questioning his existence** results in (Existence exists, I observe existence with my 5 senses and think about it, therefore I am conscious of my existence); or "I think, therefore I am." (cogito ergo sum)
4. **Validation**- The process of establishing an ideology's relation to reality (existence).
5. **Law of Causality**- An entity must act in accord with its nature. This is a corollary to "Identity" mentioned above.
6. **LOGIC**- THE ART OF NON-CONTRADICTIONARY IDENTIFICATION.
 - a. The method by which we can validly think for ourselves.

Authors can use the discipline in two senses. In its most fundamental form, Systematic Wisdom is the art of efficiently passing thoughts from one person to others.

In its most effective form, it is the art of passing "validated" thoughts from one person to others. This is the *essence* of cogent communication.

The internet is a valuable adjunct to the concepts presented above. A simple word search on any of the technical terms listed should suffice to bring the proper clarification needed to implement a useful rhetorical dissertation.

A SUMMARY OF WISDOM / RHETORIC

1. The work of Wisdom is the cogently expressed communication of Knowledge and Understanding. It leads to higher levels of knowledge and understanding: the knowing of Knowledge and the understanding of Understanding.
2. The effect of Wisdom is to demonstrate the usefulness of Knowledge and Understanding. That is, it is to display the insight - the thought process - in an article of persuasion or in the formulation of an outcome.
3. Through the skilled use of rhetoric, all planned human activity can be communicated and directed. This is a two edged sword. Rhetoric / Wisdom can be directed to beneficial or to malevolent goals.

Let us end by reviewing some of the personal benefits which are inherent in the Trivium Method. The following will be most efficiently and effectively realized by using the trivium to train the mind for critical and creative thinking:

- 1] The path to a challenging, productive livelihood can be intelligently defined;
- 2] Sound physical health, a judicious ethical standard, a high level of self esteem and the sense of well-being can be optimized;
- 3] Rewarding personal relationships will manifest through the cultivation of beneficial ethics and well-being; and
- 4] The astuteness to best discern the issues (i.e., the quality of information) regarding security will be developed.

That is only the beginning. An adherent of the Method can acquire elevated levels of penetrating insight which would otherwise not be available. Through that insight he can also self-teach the contents of a propositional argument or of an entire, formalized subject of knowledge if he chooses to bring his - likewise - heightened focus to doing so.

When a culture's government, education systems, and news media are not corrupt, the constant need for "fact checking" is not as critical as it is during the periods of dis-information and propaganda like that which we are currently experiencing.

The Trivium is the premier method for independent fact checking. The next two benefits of insight are corollaries:

- 1] A person is truly educated in that he can now thoroughly entertain any idea without necessarily embracing it; and,
- 2] Traveling somewhat in another direction, he becomes free from the prison of his own prejudicial opinions ... he obtains an open mind.

Because the Trivium introduces equilibrium and balance through subjective thought with objective reality, he could, in fact, develop new and original propositional arguments and entire bodies of knowledge as competently as those respected people who have preceded him.

www.TragedyandHope.com / www.PeaceRevolution.org

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ATTACH-4

**Statement for New York State Assembly Education Forum
Brentwood, New York
October 10, 2013**

I am a licensed clinical social worker in New York State, and have been providing psychotherapy services since 1995. I work with parents, teachers, and students from all socio-economic backgrounds representing more than 20 different school districts in Suffolk County. Almost half of my caseload consists of teachers.

In the summer of 2012, my elementary school teachers began to report increased anxiety over having to learn two entirely new curricula for Math and ELA. I discovered that school districts across the board were completely dismantling the current curricula and replacing them with something more scripted, emphasizing “one size fits all” and taking any imagination and innovation out of the hands of the teachers.

In the fall of 2012, I started to receive an inordinate number of student referrals from several different school districts. A large number of honors students—mostly 8th graders—were streaming into my practice. The kids were self-mutilating—cutting themselves with sharp objects and burning themselves with cigarettes. My phone never stopped ringing.

What was prompting this increase in self-mutilating behavior? Why now?

The answer I received from every single teenager was the same. “I can’t handle the pressure. It’s too much work.”

I also started to receive more calls referring elementary school students who were refusing to go to school. They said they felt “stupid” and school was “too hard.” They were throwing tantrums, begging to stay home, and upset even to the point of vomiting.

I was also hearing from parents about kids bringing home homework that the parents didn’t understand and they couldn’t help their children to complete. I was alarmed to hear that in some cases there were no textbooks for the parents to peruse and they had no idea what their children were learning.

My teachers were reporting a startling level of anxiety and depression. For the first time, I heard the term “Common Core” and I became awakened to a new set of standards that all schools were to adhere to—standards that we now say “set the bar so high, anyone can walk right under them.”

Everyone was talking about “The Tests.” As the school year progressed and “The Tests” loomed, my patients began to report increased self-mutilating behaviors, insomnia, panic attacks, loss of

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appetite, depressed mood, and in one case, suicidal thoughts that resulted in a 2-week hospital stay for an adolescent.

I do not know of any formal studies that connect these symptoms directly to the Common Core, but I do not think we need to sacrifice an entire generation of children just so we can find a correlation.

The Common Core and high stakes testing create a hostile working environment for teachers, thus becoming a hostile learning environment for students. The level of anxiety I am seeing in teachers can only trickle down to the students. Everyone I see is describing a palpable level of tension in the schools.

The Common Core standards do not account for societal problems. When I first learned about APPR and high stakes testing, my first thought was, “Who is going to rate the parents?”

I see children and teenagers who are exhausted, running from activity to activity, living on fast food, then texting, using social media, and playing games well into the wee hours of the morning on school nights.

We also have children taking cell phones right into the classrooms, “tweeting” and texting each other throughout the day. We have parents—yes PARENTS—who are sending their children text messages during school hours.

Let’s add in the bullying and cyberbullying that torments and preoccupies millions of school children even to the point of suicide. Add to that an interminable drug problem.

These are only some of the variables affecting student performance that are outside of the teachers’ control. Yet the SED holds them accountable, substituting innovation and individualism with cookie-cutter standards, believing this will fix our schools.

We cannot regulate biology. Young children are simply not wired to engage in the type of critical thinking that the Common Core calls for. That would require a fully developed prefrontal cortex, a part of the brain that is not fully functional until early adulthood. The prefrontal cortex is responsible for critical thinking, rational decision-making, and abstract thinking—all things the Common Core demands prematurely.

We teach children to succeed then give them pre-assessments on material they have never seen and tell them it’s okay to fail. Children are not equipped to resolve the mixed message this presents.

Last spring, a 6-year-old who encountered a multiplication sign on the NWEA first grade math exam asked the teacher what it was. The teacher was not allowed to help him and told him to “just

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do his best” to answer. From that point on, the student’s test performance went downhill. Not only couldn’t the student shake off the unfamiliar symbol, he also couldn’t believe his teacher wouldn’t help him.

Common Core requires children to read informational texts that are owned by a handful of corporations. Lacking any filter to distinguish good information from bad, children will readily absorb whatever text is put in front of them as gospel. So, for example, when we give children a textbook that explains the second amendment in these terms: "The people have a right to keep and bear arms in a state militia," they will look no further for clarification.

We are asking children to write critically, using emotionally charged language to “persuade” rather than inform. Lacking a functional prefrontal cortex, a child will tap into their limbic system, a set of primitive brain structures involved in basic human emotions, fear and anger being foremost. So when we are asking young children to use emotionally charged language, we are actually asking them to fuel their persuasiveness with fear and anger. They are not capable of the judgment required to temper this with reason and logic.

So we have abandoned innovative teaching and instead “teach to the tests,” the dreaded exams that had students, parents and teachers in a complete anxiety state last spring. These tests do not measure learning—what they really measure is endurance and resilience. Only a child who can sit and focus for 90 minutes can succeed. The child who can bounce back after one grueling day of testing and do it all over again the next day has an even better chance.

A recent Cornell University study revealed that students who were overly stressed while preparing for high stakes exams performed worse than students who experienced less stress during the test preparation period. Their prefrontal cortexes—the same parts of the brain that we are prematurely trying to engage in our youngsters—were under-performing.

We are dealing with real people’s lives here. Allow me introduce you to some of them:

...an entire third grade class that spent the rest of the day sobbing after just one testing session,

...a 2nd grader who witnessed this and is now refusing to attend the 3rd grade—this 7-year-old is now being evaluated for psychotropic medication just to go to school,

...a 6-year-old who came home crying because in September of the first grade, she did not know what a vertex was,

...two 8-year-olds who opted out of the ELA exam and were publicly denied cookies when the teacher gave them to the rest of her third grade class,

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...the teacher who, under duress, felt compelled to do such a thing,

...a sixth grader who once aspired to be a writer but now hates it because they “do it all day long—even in math,”

...a mother who has to leave work because her child is hysterical over his math homework and his CPA grandfather doesn't even understand it,

...and countless other children who dread going to school, feel “stupid” and “like failures,” and are now completely turned off to education.

I will conclude by adding this thought. Our country became a superpower on the backs of men and women who studied in one-room schoolhouses. I do not think it takes a great deal of technology or corporate and government involvement for kids to succeed. We need to rethink the Common Core and the associated high stakes testing and get back to the business of educating our children in a safe, healthy, and productive manner.

There are 8 years between my two children so I've seen the effects of implementing standardized testing over the years and how ineffective it can be.

My oldest daughter ended up in remedial algebra her freshman year in college. She struggled with algebra when in high school but was passed along to the next grade in spite of that fact. That's when they had begun instituting the peer teaching method. The teacher never taught. She would pair up the children and have them learn on their own. When my younger daughter was in 9th grade last year, her geometry teacher divided up the students into groups of 4, and as the year progressed she would re-group the students that understood the lessons with those that were having difficulty. It was my daughter's responsibility to teach her peers. The teacher was only there to answer questions. Tests were taken as a TEAM. My daughter would answer the test and then allow her peers to copy her answers. She did this because the teacher pulled 1 test to grade and my daughter didn't want her GPA to suffer. What does this teach? The children learned that if they cheat they will get a good grade and get passed along to the next grade without any effort. My child learned that hard work didn't pay off.

There is a debate surrounding the data mining aspect of Common Core but I need to inform you that it happened to my daughter last year in history. She was instructed to fill out 4 separate surveys for her class. The questions asked about God, gay marriage, abortion, political affiliation, guns, global warming, etc. The surveys also asked questions about our family's religious and political beliefs. I know this because I was able to access the surveys through her ipad initially, but when I went to print them off to take them to the school they had been deleted from the site. The teacher told her the surveys would be anonymous, however, each ipad is numbered and each number assigned to a student so it would be easy to access a particular student's answers. The new FERPA law allows for this to happen.

I informed the school board, the teachers and the principal but the answers I received were unsatisfactory.

The school board says it's the state. The Education Secretary says it's the federal government or the school district. This directly shows that we are losing local control of our schools. While I keep running around to try to get these questions answered Common Core is still being put into place.

My brother is a professor at PennState, Harrisburg. He told me that more remedial classes are being offered to freshman than ever before. He noticed that his students display a lack of critical thinking skills necessary to be in the nursing program. He attributes this to the fact that most high school teachers are using the multiple choice method of testing which is graded by a machine.

Did you know that for 2 weeks prior to the PSSA testing the teachers suspend regular curriculum to drill the students so they will do well on the PSSA's? So to say the curricula will not follow if Common Core is implemented is untrue.

These are just a couple of examples of how the No Child Left Behind, PSSA testing and Race to the Top programs, a precursor to Common Core, are having a negative effect on our children's education. Why would anyone think that Common Core would be any better?

I respectfully request that the IRRC review and begin the process of removing the Common Core (Keystone Standards) from our schools.

Sincerely,

Heidi Bashen

The sad thing about being here today for me and the others here is that this is not the fight we wanted to fight. The fight we wanted to be in should have happened three years ago when the Common Core State Standards were adopted and approved. And if we had been informed, if we had understood what was going on, if our legislators had understood what was going on three years ago, we could have had that honest discussion and debate. But instead we are here today stuck between a rock and hard place because we are left to make a choice between two bad choices.

Either we leave the Common Core State standards adopted in 2010 with all the problems that have come to light only in the past year when they finally truly were open to criticism and debate and broad analysis, or we accept the proposed Chapter 4 revisions which are virtually the same and continue with most of the same problems. While the revisions do address some concerns related to more local control and issues with assessments and their application to students and school evaluations, which I do recognize are positive and thank the PDE and Board for making those changes, they don't go nearly far enough to address the problems and failings we now understand. The sad fact is that most of these problems were only brought to light since the adoption of the revisions in March of this year. The slight tweaks made since March do not come close to fixing these issues.

The argument made to the legislature and I am sure to the IRRC is that if you don't approve these revisions today you will negate all of those changes that PDE and the State Board have done since adopting Common Core and that Pennsylvania school districts and students will be left with a more burdensome system. But if approved my fear is that might be used as the excuse not to make the big change we need in light of the exposure of all the flaws in this new reform that we found out about too late to keep from being down the road we are on. We need to get off this road and approving these revisions might take away, in some peoples mind, the urgency to do this as soon as possible.

The fight all of us protesting here know, regardless of your decision today, must now be taken to our elected representatives who do have the power to reverse this education reform and we are planning to do so. It must be taken to our local school districts where we must be very vigilant about the new aligned curriculum being offered to our schools and where we must be very vigilant about the way children are being taught, about the impact on their wellbeing and results we are seeing. And we must support our teachers, superintendents, principles and other school employees to be aware of the effects of this new reform on them and let them know we want to cooperate and help them fight when they see the way they would like to educate children being interfered with.

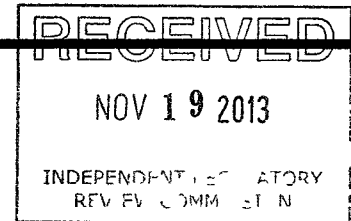
And for anyone who can't understand why there are so many protesting the adoption of these standards in our state, I think it is very telling that as the tidal wave of protest and concern has arisen across the country as we are finally understanding what this new education reform initiative really is and is not, last week in VA at a speech to the Counsel of Chief State School Officers the highest education official in the land attempted to push back not with rational arguments not with intellectual honesty but with insulting, racist comments and an attempt to stir up a little class warfare. If you don't know what I am talking about do a search on Arne Duncan and 'white suburban moms'. What we need is honest debate and mutual respect because we all want what is best for our children.

I thank you for listening to my concerns today,

Dr. Michele Jansen
Franklin County Pa

Cooper, Kathy

From: Michele Jansen <mjansenbehta@hotmail.com>
Sent: Tuesday, November 19, 2013 9:55 AM
To: IRRC
Subject: Public Comments for 11/21/13 meeting



The sad thing about being here today for me and all the others here is that this is not the fight we wanted to fight. The fight we wanted to be in would have happened three years ago when the Common Core State Standards were adopted and approved. And if I had been informed, if I had understood what was going on, if my legislators had understood what was going on three years ago, we could have had that honest discussion. But instead I am here today stuck between a rock and hard place because we are left to make a choice between two bad choices.

Either we leave the Common Core State standards adopted in 2010 with all the problems that have come to light only in the past year when they finally truly were open to criticism and debate and broad analysis, or we accept the proposed Chapter 4 revisions which are virtually the same and continue with most of the same problems. While they do address some concerns related to more local control and issues with assessments and the way they will be applied to students and school evaluations which I do recognize are positive and thank the PDE and Board for doing that, they don't go nearly far enough to address the problems and failings we now understand. The sad fact is that most of these problems were only brought to light since the adoption of the revisions in March of this year. The slight tweaks made since March did not come close to fixing these issues.

The argument made to the legislature and I am sure to the IRRC is that if you don't approve these revisions today you will negate all of those changes that PDE and the State Board have done since adopting Common Core and that Pennsylvania school districts and students will be left with a more burdensome system. But if approved my fear is that might be used as the excuse not to make the big change we need in light of the exposure of all the flaws in this new reform that we found out about too late to keep from being down the road we are on. We need to get off this road and approving these revisions might take away, in some peoples mind, the urgency to do this as soon as possible.

The fight all of us protesting here know, regardless of your decision today, must now be taken to our elected representatives who do have the power to reverse this education reform and we are planning to do so. It must be taken to our local school districts where we must be very vigilant about the new aligned curriculum being offered to our schools and where we must be very vigilant about the way children are being taught, about the impact on their wellbeing and results we are seeing. And we must support our teachers, superintendents, principles and other school employees to be aware of the effects of this new reform on them and let them know we want to cooperate and help them fight when they see the way they would like to teach being interfered with.

I thank you for listening to my concerns today,

Dr. Michele Jansen
Franklin County Pa

Dear IRRC Committee members,

Thank you for the opportunity to speak to you. My focus today is not the issue of yet-another unfunded mandate, though that is a reprehensible practice for which our kids suffer. There are others from whom you have heard about that and hopefully you have listened with attentiveness and intent.

My focus, as a parent, is to consider what is real-world, real-impact best for our children. I have an 18 year old who grinded through the spirit-stealing hours of these tests over the years. I had fundamental objections to the tests all along, but did not have the understanding that I now have. After learning that the Keystone Exams now have the possibility to be linked to graduation, I made it my business to learn more. I am one of millions of parents in the state who are invested in their children's education and I can tell you that we are angry. I am furious, as well as being deeply concerned. Instead of recognizing (or acknowledging) that these tests are abysmal and should be abolished, we are threatened with graduation requirements being linked to them. I am exhausted with efforts to make up the difference between what my child (along with his teachers) should have time to learn in school vs. what there is actually time for after the weeks of time spent preparing for and taking these tests. So, unfortunately, the decision before you today is not whether to dismantle this insult of a program, BUT whether it should be strengthened with blackmail towards graduation. I will be opting my child out of these tests, working with his principal to develop a curriculum that he will attend to that makes his time in school a truly valuable experience. Both of my children are good students. They actually know stuff. And they are college-bound.

You are deciding today whether my child will still graduate if I opt him out. I opt out due to spiritual reasons, because I believe that these tests are one giant step toward extinguishing a child's inner light. So, if you make the unfortunate decision to link these tests to graduation, my only hope is that within the next 5 years, before my son is due to graduate, this program proves to be the train-wreck that it actually is. If we are really, really interested in what is best for our children, we will not hold teachers, parents and their students hostage, and instead, devote resources toward letting them teach, letting them learn, without the shackles that are demoralizing the best in us.

Thank you,

Linda Mackey

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

Good morning and thank you for allowing all parties to voice their opinion today on PA state Education policy. *I am against CCSS PA.*

My name is Rochelle Porto, I am a parent, a taxpayer and a 15 year veteran educator in the public school system here in Pennsylvania. My teaching career is working in and with Title one funded schools. Annually, Title 1 provides over \$14 billion to school systems across the country I understand that to implement Common Core it will add to that dollar amount estimated at \$650 million dollars more. Who is going to foot that bill?

Today your decisions are to be based on facts and figures, but I'm here today to testify that I love what I do. I love the students I teach because I live in America and I believe that we live in a nation where all men are created equal NOT COMMON. We are all born with different talents and abilities, but we are equal under the laws of Nature and Nature's God.

I have to ask, "What was your education like in school. Did your teacher ask you to know the standards, and the college level words at grade 1 listed in that standard or did you learn to count 1,2,3,...? CCSS says I have to post the standard CCSS.Math.Content.K.CC.B.4 Understand the relationship between numbers and quantities; connect counting to cardinality. Then, the child in kindergarten has to be able to count and know he's connecting it to cardinality. The student needs to use this language.

Since I earned my Masters in 2002, every 3-5 years what teacher do changes. First it was NCLB, now it is CCSS. If you thought that NCLB resulted and pressured teachers into teaching to the test, well guess what, CCSS will produce more of this NOT less because the data systems needed to be implemented alongside the standards will rank students and teachers abilities. You're crazy to believe teaching to the test won't happen.

Common Core is not a child friendly. My colleague in the third grade said to me that the new Common Core math program is not working for her students. It is changing everything they know about how to add and subtract. It adds too many layers to get the answer. Students want to get the answer and move on. Another teacher in 4th grade said that she sees nothing beneficial to this new math program and is relying on the "normal" methods that the students have already mastered to move them onto the the pre-algebra math lessons she needs to teach. She said the new math is too confusing and too time consuming to even try to implement.

I work with students with an IEP. My students are already 2 plus levels below grade level. They didn't get the 1-2 step procedures to add/subtract, you have to be out of you mind if you think I'm adding college level language and 5 more steps to their processing abilities. Do you want to see children who feel stupid, then come to my school in at PSSA time when I'm expected to give my students with an IEP a test that is 2 years above what their individual education plan says.

Gates is the main funding source behind CCSS. Unlike what he thinks, I AM NOT A COMPUTER PROGRAMMER WORKING WITH A MACHINE. I AM A TEACHER WORKING WITH LITTLE MINDS WHO TRUST ME THAT I'M GOING TO MAKE THEM SMARTER NO MATTER HOW LONG IT TAKES. FOR 15 YEARS I'VE DONE THAT.

I know I was supposed to talk about the financial impact, the intrusive data mining and added levels of testing that CCSS will impose on the education system, but I cannot overlook what I do and who I work for. I work for amazing children who are all able to be great contributors to society. They may not all learn that $2 \times 5 = 10$ on the same day at the same time in the same year and all the college level processes behind it; but they will learn this fact.

Please see beyond the bottom line and realize that you're decision here today will affect human beings. You're deciding on putting into place education standards that are untested and unproven to work to improve student intelligence. Yes, the teaching profession the adults need to make sure they teaching to high standards in their jobs, but to require that those same adult standards be learned and then processed verbatim by all children is crazy. How can anyone possibly believe that this is what will make our children finally succeed in schools. How about THE adults in the room, stop changing the rules ever 3-5 years because of adult ADHD and corporate profiteering. We didn't learn standards, we learned.

Thank you.

Cooper, Kathy

From: Mary Martin <maryeau01@yahoo.com>
Sent: Tuesday, November 19, 2013 10:14 AM
To: IRRC
Subject: Testimony re: State Standards for Hearing Nov 21

IN 2011 only 34% of students passed the Keystone Exams, with 60,000 students failing. My son was one of those students, and he is an AP student. The cost to retake the standardized test for students like my son was \$1 million.

He is on track to graduate this year and is pursuing a career in physics. He is currently weighing options and scholarships from universities.

With the Keystone Exams and alternative state generated project based alternative, local authority for graduation is removed from the school. Regardless of a student's GPA throughout high school, and the quality daily work demonstrated over the 4 years of high school, Chapter 4 ties the hands of the local school system to graduate deserving seniors.

What will be the cost to each district? Do we as parents and taxpayers have any say as to the additional expenses that our schools will incur to implement this unproven, unfunded mandate? To submit Pennsylvania citizens to this expense, the state should at the very least allow it to come to a vote by the people your decisions affect.

Over the summer, I had the opportunity to ask several teachers, "If you were given the opportunity to improve just ONE THING about the education of our schools without regard to expense, what would it be."

Not surprisingly, none of them answered Keystones, or Common Core standards. In fact, some of them asked to lessen the burden that goes along with testing such as breaking up class time for strategy meetings, eliminating the time tutorials and computer drills take away from real learning.

Each teacher had solid and practical ideas that could be implemented with little or no cost. It would serve us well to ask them their opinion. They are very perceptive about what the students need to succeed, and what will help them teach in the classroom.

I am blessed to have children that do often struggle with their grades. When they do have an issue, it is generally rectified with extra practice and attention at home. What provision is being made for children that do struggle and need extra time, or children with special education needs? Will they have their own test? One size fits all education

is unrealistic. A common standard sounds logical on paper, but it just doesn't work practically in the class room. The "No Child Left Behind Act" was proof that some things that work in theory, do not work in the classroom.

Who can judge a student's capability and needs better than parents and teachers? By wrapping our schools in political red tape, schools and districts are only burdened by higher expenses, and require more support staff such as new data technicians. As a parent and tax payer, I would much rather see those funds in the classroom meeting the needs of students and teachers, and have my child's privacy protected.

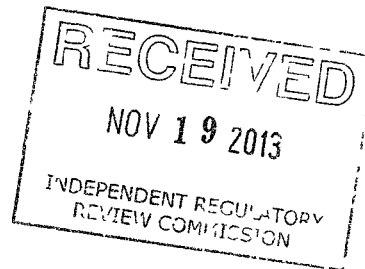
Thank you for your time,
Mary Martin
New Columbia, PA

Cooper, Kathy

From: American Family Association of PA <info@afaofpa.org>
Sent: Tuesday, November 19, 2013 9:59 AM
To: David Sumner
Subject: Testimony Regulation 6-326; IRRC No. 2976
Attachments: Testimony to IRRC 11.18.13.doc; IRRC Testimony - page 2 11.18.13.doc

Attached and below is the American Family Association of Pennsylvania testimony opposing PA Core Standards IRRC No. 2976:

David Sumner, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
via email: dsumner@irrc.state.pa.us
RE: regulation 6-326
November 18, 2013



Dear Mr. Sumner:

I write in strong opposition to the PA Core Standards - IRRC No. 2976. The claim this is a state-led initiative is so far off the mark it is ridiculous! A little background: In 2007, the Bill and Melinda Gates Foundation and the Eli Broad Foundation pledged \$60 million dollars into a campaign to infuse education into the 2008 political race. In May, 2008, the Gates Foundation awarded a \$2.2 million grant to the Hunt Institute for Educational Leadership and Policy which, one month later, hosted a symposium alongside the National Governors Association (NGA) on education strategies. NGA and the Council of Chief State School Officers (CCSSO) began accepting federal grants with which to launch Common Core. In December, 2008, NGA, CCSSO and Achieve – their contractor in Washington, D.C. – laid out a vision for Common Core standards in a document called *Benchmarking for Success* - again funded by the Gates Foundation! The American Recovery and Reinvestment Act earmarked \$4.35 billion for states that make “significant progress” toward four education-reform objectives. One week after the bill was passed, Secretary of Education Arne Duncan rolled out the federal “Race to the Top” program through the Department of Education (DOE). In a C-SPAN interview, Secretary Duncan explained, “We want to get into this game.... There are great outside partners – Achieve, the Gates Foundation, others – who are providing great leadership.... I want to be the one to help it come to fruition.” The Gates Foundation has given grants to the PTA, National Catholic Education to push Common Core. How much have business associations in Pennsylvania received from Gates to push it here in the Commonwealth?

Phase I Race to the Top applications were invited in November, 2009, with a due date of January 19, 2010. “[A]pplicant states were required to demonstrate their commitment to Common Core without having seen even a draft of the standards.” How much Race to the Top money did PA received tying us to Common Core?

Problems within the "standards include: The curriculum replaces the classics with government propoganda. According to the American Principles Project, "They de-emphasize the study of classic literature in favor of reading so-called 'informational texts,' such as government documents, court opinions, and technical manuals." Over half the reading materials in grades 6-12 are to consist of informational texts rather than classical literature. Historical texts like the Gettysburg Address are to be presented to students without context or explanation.

-- The math standards are equally dismal. Mathematics Professor R. James Milgram of Stanford University, the only mathematician on the Validation Committee, refused to sign off on the math standards, because they would put many students two years behind those of many high-achieving countries. For example, Algebra 1 would be taught in 9th grade, not 8th grade for many students, making calculus inaccessible to them in high school. The quality of the standards is low and not internationally benchmarked.

-- When the new Common Core educational standards were crafted, penmanship classes were dropped. But at least seven of the 45 states that adopted the standards are fighting to restore cursive instruction. Pennsylvania is not on the list of states fighting back to restore cursive. Where does PA stand on this?

-- What will Pennsylvania students be reading as part of the new standards? In other states sexually explicit books were part of the classroom experience. These include Time of the Butterflies, Black Swan Green and Dreaming in Cuban.

The Common Core math standards were written by three people: Bill McCallum: PhD in mathematics; Jason Zimba: PhD in mathematical physics; Phil Daro: Masters degree in English. Dr. McCallum said in 2010, "the overall standards would not be too high, certainly not in comparison other nations, including East Asia, where math education excels." Also in 2010 Dr. Zimba said, "[Common Core's] concept of college readiness is minimal and focuses on non-selective colleges." Just recently Trevor Packer, the Senior VP at the College Board in charge of its AP program, speaking at the 2013 annual conference of School Superintendents Association indicated that Common Core is less rigorous than what high schools routinely teach today and, consequently, the College Board is considering eliminating AP calculus.

The bloated Common Core program is underfunded. Local school administrators have already started complaining that the grants aren't enough to cover the requirements behind them. "We were spending a disproportionate amount of time following all the requirements," said Mike Johnson, the superintendent of Bexley schools in Ohio, which turned down the last half of a \$100,000, four-year grant this school year. "It was costing us far more than that to implement all of the mandates." How much will this unfunded mandate cost Pennsylvania school districts/taxpayers?

How will such a total rewrite of Pennsylvania's standards to require substandard learning impact our Commonwealth's children, our future ability to thrive? Can we be truly competitive on the national and international scene? Common sense tells us that the PA Core Standards are not the answer.

Sincerely,

Diane Gramley
President



**American Family Association
of
Pennsylvania**

P.O. BOX 1048, Franklin, PA 16323 Phone: (814) 271-9078
fax: (814) 437-5432 website: www.afaofpa.org e-mail: info@afaofpa.org

David Sumner, Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
via email: dsumner@irrc.state.pa.us
RE: regulation 6-326
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Sincerely,

Diane Gramley
President



1

**THE PENNSYLVANIA STATE CONFERENCE OF NAACP BRANCHES
THE EDUCATION COMMITTEE
NOVEMBER 21, 2013 PUBLIC COMMENTS BEFORE
THE PENNSYLVANIA INDEPENDENT REGULATORY REVIEW COMMISSION**

No organization has a longer standing history in the struggle for equitable education for all children than does the National Association for the Advancement of Colored People. It is due to that commitment that the Pennsylvania State Conference of NAACP Branches (PA NAACP) requests that the IRRC reject The State Board of Education (Board) final-form regulations #006-326, amending 22 Pa. Code Chapter 4, and return them to the Board for further review and revision based on the following:

1. The final-form of Chapter 4 regulations systematically entangles the new academic standards with Keystones Examinations, a student's scores on which will determine his or her graduation from high school. This is a far-reaching, harsh, and unwarranted change from the use of the Keystone Exams as 33% of a student's final course grade.

2. Such an entanglement makes it impossible to support the new standards while opposing high stakes graduation tests. PA NAACP opposes the use of Keystone Exam scores as the determination for high school graduation.

Local school districts are best suited to determine who has satisfied requirements for high school graduation. There is no scientific evidence to support the myth that Keystone Exams reflect how well a student has been educated over 12 years, or to support the myth that such scores are related to career readiness..

At the same time, Pennsylvania's law makers have failed to provide state education funding adequate for all districts to thoroughly prepare all students to succeed on Keystone Exams. Indeed, the funding system is so rigged that most assuredly many bright young Pennsylvanians will be shanghaied by the Keystone Assessments trap and relegated to lives of adversity and struggle because they have no high school diploma.

By intent, the implementation of the Keystone Examination System to disqualify students from high school graduation will bar a critical mass of young people from higher education and gainful employment. Hence, the Keystone Assessment system serves as a social engineering tool that will devastate Pennsylvania economically.

3. The Keystone Assessment system creates a *de facto* state-mandated curriculum through its academic requirement modules, its eligible content and its assessment anchors. According to the Department of Education:

The Assessment Anchors, as defined by the Eligible Content, are one of the many tools the Department believes will better align curriculum, instruction, and assessment practices throughout the Commonwealth... .



2

**THE PENNSYLVANIA STATE CONFERENCE OF NAACP BRANCHES
THE EDUCATION COMMITTEE
NOVEMBER 21, 2013 PUBLIC COMMENTS BEFORE
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The Assessment Anchors, as defined by the Eligible Content, can help focus teaching and learning because they are clear, manageable, and closely aligned with the Keystone Exams (Pennsylvania Department of Education. *Assessment Anchors and Eligible Content*, p.2). Available: On-line November 12, 2013 at www.pde.state.pa.us.

Students have access to the equivalent of approximately 180 sessions of 45 minutes each for the recursive cycle that includes introduction to, direct instruction on, practice of, assessment concerning and remediation on new concepts. Due to the time constraints of the school day and the nature of human learning; failure to adjust instruction (teaching to the test) and to focus on the eligible content (kinds and content of questions) for the Keystone Exams can result in extreme consequences.

If teachers do not teach to the test, students may well fail the test. Teachers may well be evaluated as ineffective. Districts may well be identified as FAILING. Failing labels on districts equal lower property values. This is tantamount to coercion. It constitutes a stealthy state take over of local control. The state has standardized what will be taught and, on the whole, created a series of punishments that impact teachers, administrators, districts, students and tax payers if the state curriculum is not closely adhered to.

4. The Keystone Assessment system as a graduation requirement is not appropriate to and fails to show leadership related to contemporary conditions in Pennsylvania education. It is harmful in its employment while, at the same time, it is impossible for many districts to implement.

Statistics for the recent pilot test scores show a significant failure rate on the part of students statewide. Although the Department has released two widely differing sets of data, whether we believe 60% of students failed Algebra I or 35% of students failed; the figures indicate a major problem. Stripped of teaching materials and human resources due to state budget cuts, districts will find mounting numbers of students who need supplemental instruction and retesting. These mandates require teaching materials and human resources. Districts will be forced to raise property taxes in order to comply with the regulations.

5. The Board abdicates reason and responsibility and creates an onerous financial burden on local districts and the tax payers in the form of unfunded mandates that



3

**THE PENNSYLVANIA STATE CONFERENCE OF NAACP BRANCHES
THE EDUCATION COMMITTEE
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require districts to provide supplemental instruction in content areas where students do not score proficient on Keystone Exams or a district equivalent.

This is especially insidious given the financial impact of recent state funding cuts to education of close to \$3 billion over the past three years. The Board is fully aware that the regulation requiring tutoring and summer retesting opportunities for students who do not score proficient on a Keystone assessment cannot be followed by underfunded districts that have been forced to discontinue both tutoring and summer programs.

The recent school funding budget cuts have been hardest on the most-needy schools which are attended by the most at-risk children in areas stricken by poverty (PSEA. "Poorest school districts hit hardest by Corbett funding crisis"). Available: On-line November 17 2013 at www.psea.org.

Hence, the Board knows it has written regulations with which some districts cannot comply. The Board knows which districts cannot comply. The Board knows the demographics of the students who will most probably fail to complete high school due to the Keystone Assessment System. The Board knows that it is Pennsylvania's financially struggling families that will bare the burden of tax increases.

6. The Board demonstrates a callus disconnect from the budgeting conditions facing the school districts of Pennsylvania. The Board has made clear under the section, "PA Core Standards", that it is "the policy of the Board that LEAs [Local Education Agencies] employ sufficient qualified professionals to enforce the curriculum requirements of state law and this part."

The range of professionals necessary to enforce curriculum requirements extends beyond classroom teachers. Current research shows that given the pervasive psychological and emotional trauma experienced by the youth of today, as many as 60% of our children struggle in school. Personnel in the form of school counselors, art, music, and physical education teachers bring to these youth the relief to mitigate the learning impediments caused by trauma. Such personnel, while essential to school success for a preponderance of children, have been cut due to budget constraints.

The Board is aware of the cuts in the Humanities; specifically art and music and the cuts in school counseling staff that districts have been forced to make. Districts lack the flexibility to hire in the areas necessary to meet the full demands of the Keystone curriculum.



4

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As well, the Board is aware of the underfunding of special education in many districts due to Pennsylvania's ill constructed special education funding formula.

7. The State Board abdicates reason, responsibility and prudence as it positions the Commonwealth for litigation. The State Board is obviously aware of the difficulties high stakes graduation tests pose to and the disparate impact they have on English Language Learner (ELL) students.

Research in Second Language instruction has found that it takes students 4 – 10 years to become proficient in academic language (Hayes, J., *Stages of Second Language Acquisition*, 2005). Available on-line: Nov. 17, 2013. www.everythingESL.net. Hence, the Board has yet to demonstrate that all Pennsylvania students will have had an opportunity to learn the content and skills to be tested or to have provided all students equal access to test preparation.

That the Board recognizes problems with requiring high stakes graduation tests for ELL students is made clear in that Chapter 4 cites the Board's plan to in the future publish the Keystone Exams for Math, Science and Civics in Spanish. This plan is harmful to students and to the Commonwealth in two ways:

First, it positions Spanish speaking children to receive instruction in English; and then to be assessed in Spanish. Content curriculum is vocabulary specific. Students must be systematically taught the academic terms of the field as well as the transitional devices that show relationship amongst ideas in an academic text. Use of those terms and transitions is fundamental to and the basis of assessment. To receive instruction in English, then to be assessed in the academic terms and transitional devices of a different language is unsound practice, academically untenable, and invalid.

Secondly, to choose to provide native language test access to only Spanish speakers will surely be seen as discriminating against other second language speakers based on their place of origin. This is a Title VI issue.

Clearly, the Keystone Assessment system is a plan that is written to fail. It will waste millions of tax dollars as districts struggle to implement it. It will fail - and it will destroy young lives as it fails. It will cost the Commonwealth dearly in the litigation that is sure to come.

The State Board of Education final-form regulation #006-326, amending 22 Pa. Code Chapter 4, The Keystone Exams plan, will dismantle local control of education; force districts to increase taxes; deprive young people access to develop the potential of their



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**THE PENNSYLVANIA STATE CONFERENCE OF NAACP BRANCHES
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lives, to the liberty to make their ways through life with dignity, and to pursue their goals.
The regulations do not serve the public good.

Respectfully submitted,

Nov. 21, 2013

Joan Duvall-Flynn, Ed.D., Education Committee Chair

J. Whyatte Mondesire, President of the State Conference of NAACP Branches

ALLEGHENY EAST BRANCH
Lorraine Lewis Burke, President

CHELTENHAM AREA BRANCH
Harvey L. Crudup, President

ALLEGHENY-KISKI BRANCH
Dr. Liney Glenn, President

CHESTER BRANCH NAACP
Darrell Jones, President

ALLENTOWN BRANCH NAACP
Daniel C Bosket, President

CLAIRTON BRANCH NAACP
Greg E. Stewart, President

AMBLER BRANCH NAACP
Evelyn H. Warner, President

COATESVILLE BRANCH NAACP
Tonya Thames Taylor, President

BEAVER COUNTY BRANCH
Willie Sallis, President

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Sheila A. Carter, President

BETHLEHEM BRANCH NAACP
Esther M. Lee, President

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Deborah Brown, President

BLAIR COUNTY BRANCH NAACP
Donald E. Witherspoon, President

EASTON BRANCH NAACP
John Robinson, President

BUCKS COUNTY NAACP
Victoria Harris, President

ERIE BRANCH NAACP
Dorothy Smith- Frazier, President

CARLISLE (Greater) BRANCH
Dwayne Jackson, Sr., President

FAYETTE COUNTY BRANCH
Clinton Anderson, President



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GREATER GETTYSBURG UNIT
Sara Gondwe, President

**GRATERFORD CORRECTIONAL
FACILITY NAACP**
Mr. Donald Jones, CM1887, President

**GREENSBURG-JEANNETTE BRANCH
NAACP**
Rev. Dr. Jack Sullivan, Jr., President

HARRISBURG (Greater) BRANCH
Stanley R. Lawson, Sr., President

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Dr. Carolyn Princes, President

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Dr. Clea P. Hollis, President

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YEADON BRANCH NAACP

Linda Osinupedi, President

YORK BRANCH NAACP

Sandra Thompson, Esq., President

NATIONAL BOARD

Jessica D. Butler

J. Wyatt Mondesire

Remarks to the Independent Regulatory Review Commission

I am speaking as a member of the West Chester Area School Board and as a lifetime teacher/administrator. Our district has worked assiduously to incorporate the PA Common Core Standards, to do the necessary intensive staff development with our teachers, and to incorporate the new standards into our classrooms. The reason I am here today is not to disparage the standards or the goal of getting all our students to be college and career ready. I am here to bring the strong opposition of our administrators, teachers, parents and school board to the Keystone tests being used as graduation requirements. We join with 58 other schools districts in SE PA in this opposition and in the request that the Keystone graduation requirement be rescinded. I will give you one example of how our excellent district is reacting to the exams, and how it is going to impact us financially and educationally:

The estimated cost **for our school district alone** for remediation of students required to pass the Keystone exams will range between \$366,000 and \$498,000 annually. These required expenditures have no proof of cost effectiveness and represent an unfunded mandate.

At our last board meeting we were given a proposal from our district administration to hire three fulltime Biology Specialists. Like a reading or math specialist, this would be a support person (not a classroom teacher) who would specifically be assigned to help teachers do a better job of preparing students for the Keystone biology tests, for tutoring students who fail the tests, for working with students on projects after they fail the tests, and for administering the tests. The cost of these three positions was estimated to be \$252,000. Why three fulltime Biology Specialists and not the alternate of tutoring students before and after school? The reasons are financial, of course, but issues around trying to schedule high school students for tutoring/projects before 7:20 a.m. and after school are enormous.

The proposed Chapter 4 regulations also mandate that students are eligible to take a project-based assessment in lieu of additional Keystone Exams after at least two non-proficient attempts (one non-proficient attempt for students with an IEP). You can read "non-proficient attempt" as "failure." Students not graduating certainly will. This process requires both a tutor and a test administrator, both for extensive hours and thus significant dollars. We are not able at this time to estimate the number of hours involved in preparing for the tests (our parents are already calling it teaching to the test), in tutoring and working with students who fail, and who must be tutored before retaking the tests or start working on the project-based assessment. Our intermediate unit estimates the time to be significant. The time required for students to do these things will **not** be time spent achieving their personal best, which is our district mission.

The Keystones used as graduation requirements are a certain pathway to failure for a significant number of our students and later their teachers who will also be labeled as failures. It is altogether a negative, a punitive and a hopeless attempt on your part to have our students be "college and career ready." You have married two entities that were never meant to be married: The Common Core Standards and graduation requirement called Keystones. In recent months you have threatened school districts that if the three Keystones do not pass today, the state will revert to the regulations that dictate we give 10 Keystone exams which will each count one-third of the student's grade. NEITHER OPTION IS ACCEPTABLE.

Our district calls upon the State Board of Education, the PA General Assembly and the Independent Regulatory Review Commission to write and approve NEW Chapter 4 regulation that allow local districts the ability to determine graduation requirements and to eliminate and remove language requiring the unfunded mandate of passing graduation exams.

Thank you for the opportunity to read these remarks.

Susan Tiernan
West Chester Area School District
School Board Director
November 21, 2013

Attached is a copy of the resolution our school board will pass on November 25th.