



Understanding Common Core

Why Common Core Standards is Bad for Our Children and Our Country

Presented to the Poway Unified School
District Board of Education
by Citizens for Quality Education

April 22, 2013

LETTER OF INTRODUCTION

April 22, 2013

Dear Poway Unified School Board Members,

Citizens for Quality Education is a group of Poway Unified School District (PUSD) residents who has serious concerns about the District's adoption and implementation of Common Core State Standards.

The purpose of this booklet is to

- 1) Make the Board and all voters, tax payers, students, parents, teachers, and administrators who read it aware of the community's genuine concerns regarding the implementation of Common Core State Standards (CCSS).
- 2) Establish a transparent dialogue between the community and this Board regarding CCSS.
- 3) Stimulate the public to engage in the debate about the merits of CCSS.
- 4) Obtain answers from the Board about their plans with regard to CCSS.

Though there are many topics related to CCSS that require your attention, for the purpose of clarity and brevity, we have chosen to focus *first* on the following:

- 1) The origins of CCS standards
- 2) The quality of the new math and ELA CCS standards
- 3) The effectiveness of the standards to prepare students for higher education
- 4) The costs to implement the CCS standards
- 5) The alignment of CCS standards with California's SBAC assessment test
- 6) The longitudinal data systems and their impact on student and family privacy

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Common Core State Standards are being promoted as a "state-led" effort but the truth is that the CCS standards were initiated by private interests in Washington, D.C. without any directives from the states. With Department of Education 2009 Stimulus dollars, the creators of the standards, Achieve, Inc. enlisted two trade associations, the National Governors Association and the Council of Chief State School Officers, to promote the standards to state governors and educators.

As the debate rages across the US about the merits of the CCSS, many educators and analysts are declaring that the standards are not the "internationally benchmarked" product that is being proposed. For example, Dr. Sandra Stotsky, a senior policy advisor on CCSS, refused to sign off on the standards. She stated that Common Core's "college-readiness" standards for English language arts and reading are simply empty skill sets. Stanford University mathematician James Milgram, the only mathematician on the Common Core validation team, refused to sign off on the math standards.

Based on our research derived from credible sources, we have formed the opinion that the standards driving the PUSD curriculum will decrease college readiness and will impede our students' ability to thrive. We also submit that there may be unintended consequences that will affect the positive effects that an exceptional school district has on commercial enterprises in our region.

Calls to the California Department of Education CCSS office revealed that there is no information about the costs to implement the standards, create the curriculum, train the teachers, administer the assessment tests, or purchase the technology required to administer those assessments.

Research has revealed that the national assessment consortium, SBAC, which was adopted by the state of California, will be oriented to the standards. Additionally, we have learned that there are extensive longitudinal data systems associated with this assessment.

Poway Unified Schools are exceptional and the district draws people from all over the country. They establish homes here, they set up businesses, and they work in this community. The top quality schooling in the PUSD has created a demand for real estate and resulted in increased commerce within the area.

The intent of this booklet is to

- 1) highlight the questionable **CLAIMS** put forth by state and federal agencies and NGOs on the topic called CCSS
- 2) present documented objective **FACTS** from credible sources that contradict the claims
- 3) **SUMMARIZE** the data

Finally, we are asking that the PUSD Board please present to the voters in the region, who elect them to office, in a transparent, public way, specific and detailed answers to the following four requests.

- 1) The Board will provide an initial study on the impact of CCSS on the quality of education.
- 2) The Board will provide a budget analysis to forecast the costs to implement CCSS and compare it to the current budget.
- 3) The Board will investigate changes in the education privacy laws, including FERPA, and make them known to the public, and provide clear policies to guarantee privacy for teachers, students, and parents.
- 4) The Board will explore and provide an exit strategy to potentially withdraw from CCSS if it is not effective or is detrimental to students and their learning environment.

The Tenth Amendment to the United States Constitution states,

"The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people."

Since education is not mentioned in the Constitution, it is one of those powers reserved to the states and the people.

Citizens for Quality Education therefore asks: Who is responsible for setting educational standards? Should our local school district and community set the standards, or should the federal government's Department of Education—an unelected bureaucracy, arguably ineffective in improving education since its inception in 1979?

We are hopeful that this booklet will stimulate an open dialogue about the tangible merits of Common Core State Standards in the Poway Unified School District.

Thank you for your consideration.

Citizens for Quality Education

ARE COMMON CORE STANDARDS A STATE EDUCATION- OR WASHINGTON DC-DRIVEN POLITICAL INITIATIVE?

CLAIM: *Common Core is a state-led initiative.* ~ www.corestandards.org

FACTS:

The Common Core standards (CCS) were initiated by private interests in Washington, D.C., without any representation from the states. The creators of Achieve, Inc. enlisted two trade associations, the National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO), to promote the standards to state governors and educators.

As early as January 2009, US Department of Education Secretary, Arne Duncan told reporters that he would consider using Race to the Top funds to push for more uniform, national standards.

“This is one of the significant problems of No Child Left Behind (NCLB). It let every state set its own bar and we now have 50 different standards, 50 different states all measuring success differently, and that’s starting to change. We want to reverse that.”¹ ~ Arne Duncan, US Department of Education Secretary

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SUMMARY:

The Common Core State Standard Initiative (CCSSI) is promoted as a “state-led” effort; however, the NGA has been pushing nationalized standards since 1989 when it worked with President George H. W. Bush on his National Education Goals Panel, which was established in 1990 by executive order.²

Also, contrary to claims that the CCSSI is a grassroots endeavor to promote college and career-ready academic standards, the Obama administration was intimately involved from the start.³

Sources

¹ “Excerpts from Secretary Arne Duncan’s Remarks at the National Press Club,” US Department of Education, Homeroom Blog, June 1, 2009, <http://www.ed.gov/blog/2009/06/excerpts-from-secretary-arne-duncan%E2%80%99s-remarks-at-the-national-press-club/>; and National Governors Association, “Forty-Nine States and Territories Join Common Core Standards Initiative,” June 1, 2009, Press Release, 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

² States’ Impact on Federal Education Policy Project (SIFEPP), New York State Archives, Albany, “The George H.W. Bush Years: Goals Panel,” http://www.archives.nysed.gov/edpolicy/research/res_essay_bush_ghw_goalspanel.shtml

³ Common Core State Standards Initiative, About the Standards, <http://www.corestandards.org/about-the-standards>.

DO MATH STANDARDS PASS PEER REVIEW?

CLAIM: *In mathematics, the Standards lay a solid foundation in whole numbers, addition, subtraction, multiplication, division, and decimals. Taken together, these elements support a student's ability to learn and apply more demanding math concepts and procedures. ~ www.corestandards.org*

FACTS:

Stanford University mathematician James Milgram, the only mathematician on the Common Core validation team, refused to sign off on the math standards.¹

Many experts in mathematics education find the standards lacking and confusing:

I have thoroughly reviewed the Common Core Standards and have found that they fail to achieve their stated goal of improving US K-12 mathematic achievement.² ~Ze'ev Wurman

Many of these standards require that students be able to explain why a particular procedure works. It's not enough for a student to be able to divide one fraction by another. He or she must also "use the relationship between multiplication and division to explain that $(2/3) \div (3/4) = 8/9$, because $3/4$ of $8/9$ is $2/3$."³ ~ Barry Garelick, Secondary Math Teacher in California

SUMMARY:

James Milgram concluded that the Common Core standards are "in large measure a political document...written at a very low level and does not adequately reflect our current understanding of why the math programs in the high achieving countries give dramatically better results."⁴

Sources

¹Pioneer Institute Report, Controlling Education from the Top: Why common core is bad for America, May 2012

²Ze'ev Wurman, Chief Software Architect and member of the 2010 California Academic Content Standards Commission that evaluated the suitability of Common Core's standards for California. Pioneer Institute Report, , Controlling Education from the Top: Why common core is bad for America, May 2012, Exhibit B p. 23

³Garelick, B., *A New Kind of Problem: The common core math standards*, The Atlantic, 2013

⁴"Testimony on the CCSS! Core Standards and the new draft TX math standards," R. James Milgram, Professor of Mathematics Emeritus, Stanford University, May 2011, <http://coehp.uark.edu/colleague/9864.php>

WILL NEW MATH STANDARDS PREPARE STUDENTS FOR COLLEGE?

CLAIM: *Common Core State Standards is mathematically coherent and leads to college and career readiness at an internationally competitive level. ~ www.corestandards.org*

FACTS:

Dr. Sandra Stotsky and Ze'ev Wurman, former US Department of Education senior policy advisor, concluded that the Common Core notion of college and career readiness "may decrease, not increase, student achievement."¹

Stotsky and Wurman add that California will be especially hard hit by this result since its April 2010 uniform college and universities admissions requirements are much more demanding than the Common Core benchmark.²

The math standards were set just high enough to avoid community college remedial classes but still so low that they don't cover topics required for admissions in most state universities nationwide.³

SUMMARY:

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.⁴ ~ Ze'ev Wurman, senior policy advisor

Sources

¹Sandra Stotsky and Ze'ev Wurman, *The Emperor's New Clothes: National Assessments Based on Weak "College and Career Readiness Standards,"* Pioneer Institute White Paper No. 61, May, 2010, p. 1, <http://pioneerinstitute.org/education/new-pioneer-pacific-research-institute-report-weak-national-standards-basis-for-weak-national-tests/>

²ibid

³"Testimony on the CCSS Core Standards and the new draft TX math standards," R. James Milgram, Professor of Mathematics Emeritus, Stanford University, May 2011, <http://coehp.uark.edu/colleague/9864.php>

⁴ Ze'ev Wurman, Pioneer Institute Report, Controlling Education from the Top: Why common core is bad for America, May 2012 Exhibit B p. 25

DO ENGLISH LANGUAGE ARTS STANDARDS PASS PEER REVIEW?

CLAIM: *In English-language arts, the Standards require certain critical content for all students, including: classic myths and stories from around the world, America's Founding documents, foundational American literature, and Shakespeare. ~ www.corestandards.org*

FACTS:

In grades 6-12 English teachers would be required to spend over 50 percent of their time on nonfiction and informational texts such as seminal US political documents, court decisions, and scientific and technical manuals.¹

The reading standards for both literature and informational text fail to address the specific text types, genres, and subgenres in a systematic intersection with the skills they target².

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 subgenres, such as satires or epic poems, are never addressed.³

By 2012, controversy erupted when it was realized that official Common Core Standards examples of informational texts included a *New Yorker* article that was sympathetic to the *Affordable Health Care for America Act*, also referred to as *Obamacare*. President Obama's Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation Management," was another featured informational text example.⁴

SUMMARY:

What appalls me the most about the Common Core standards is the cavalier contempt for great works of human art, thought and literary form...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 miss-education.⁵ ~ Antony Esolen, professor of Renaissance English Literature at Providence College, RI

Sources

¹ Dr. Sandra Stotsky, Pioneer Institute Report, Controlling Education from the Top: Why common core is bad for America., May 2012 Exhibit A p. 21

²ibid.

³Fordham Institute, Pioneer Institute Report, Controlling Education from the Top: Why common core is bad for America, May 2012 Exhibit A p. 22

⁴ Common Core State Standards Initiative, Common Core State Standards for English Language Arts & Literacy in History/ Social Studies, Science, and Technical Subjects: Appendix B: Text Exemplars and Sample Performance Tasks, pp. 181 and 183.

⁵ Koehle, O., Common Core: A Trojan horse for education reform, 2012, p. 33

WILL NEW ELA STANDARDS PREPARE STUDENTS FOR COLLEGE?

CLAIM: *The standards are designed to build upon the most advanced current thinking about preparing all students for success in college and their careers. ~ www.corestandards.org*

FACTS:

*Common Core's "college-readiness" standards for English Language Arts (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."*¹ ~ Dr. Sandra Stotsky

Common Core's ELA standards are designed to prepare students only for nonselective community colleges—[a] fact admitted by one of the Standards writers when questioned by skeptical Standards-evaluators.²

Just as NCLB allowed schools to lower the cut scores on their tests in order to have competitive Academic Yearly Progress (AYP) scores, schools will be tied to ONE national standard that will put all students into a "one size fits all" system. Some states could improve, but many will find their existing standards lowered to accommodate every student in order to make EVERY student ready for college.³

SUMMARY:

"...their promise of college readiness rings hollow. Its college-readiness standards are below the admission requirement of most four-year state colleges. I believe the Common Core marks the cessation of educational standards improvement in the United States. No state has any reason left to aspire for first-rate standards, as all states will be judged by the same mediocre national benchmark enforced by the federal government.

Moreover, there are organizations that have reasons to work for lower and less-demanding standards, specifically teachers unions and professional teacher organizations. While they may not admit it, they have a vested interest in lowering the accountability bar for their members. With Common Core, they have a single target to aim for, rather than 50 distributed ones. So give it some time and, as sunset follows sunrise, we will see even those mediocre standards being made less demanding."⁴ ~ Ze'ev Wurman

Sources

¹ Dr. Sandra Stotsky, Pioneer Institute Report, *Controlling Education from the Top: Why common core is bad for America*, May 2012 p. 9 footnote 43

² Ibid.

³ Heritage Foundation Factsheet #65 *Education Standards: The Next Federal Takeover*. June 2010

⁴ Ze'ev Wurman and W. Stephen Wilson, "The Common Core Math Standards," *Education Next*, Vol. 12, No. 3 (Summer 2012), pp. 46, 49-50, <http://educationnext.org/the-common-core-math-standards/>

WILL CALIFORNIA PAY MORE FOR LOWER STANDARDS?

CLAIM: *Common Core will cost the state about \$760 million to implement. ~ California Department of Education*

FACTS:

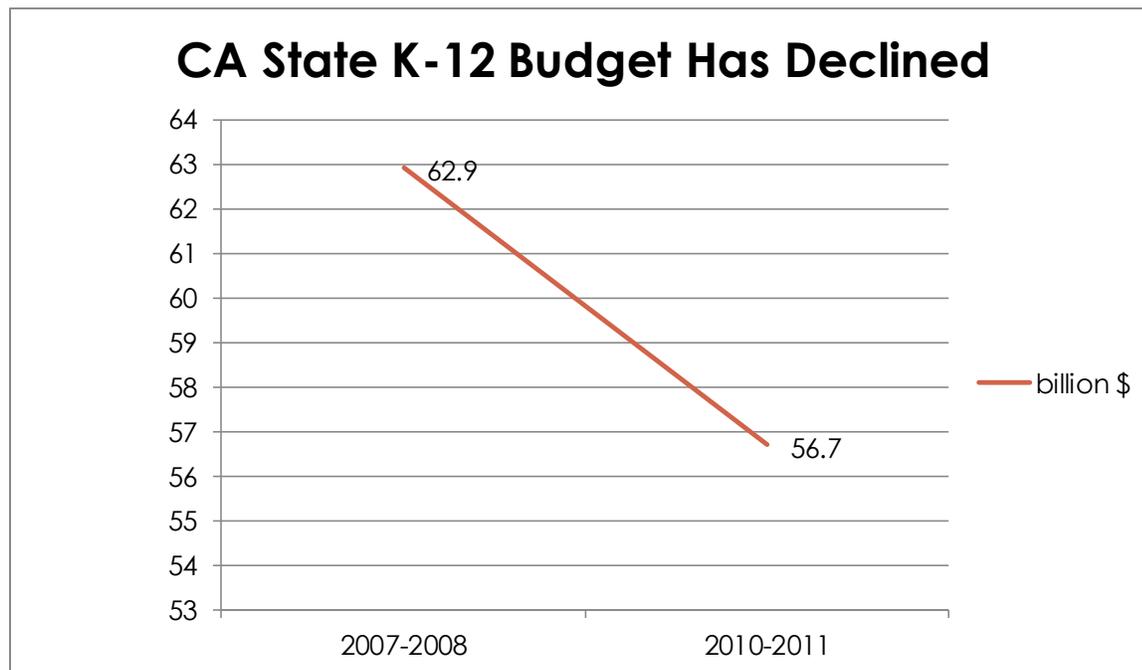
Estimated Future Costs

There are approximately 6,252,031 K-12 students in California. The \$760 million estimate yields a unit cost of \$122 per student.¹

California did not win Race to the Top (RTTT) grants in Phase 1 or Phase 2 but received \$104,207,642 in competitive awards in subsequent competitions. This means that California received \$17 per student to help pay for the implementation of CCSS.²

This \$760 million would be on top of what California is already spending on its current standards.³

Current and Future Costs



This is a reduction of nearly 10 percent. Since the development of its current standards, California has spent tens of millions of dollars each year to develop and administer assessments aligned to its standards at grades 2 through 11. The state further spent \$1.6 billion to assist local districts with implementation [of those standards].

Based on the number of California teachers reported by the National Center for Education Statistics in the 2009-2010 school years, it is estimated that initial core training for teachers in all California schools would cost approximately \$627.6 million.

The California Department of Education also estimated the cost to districts of implementing ELA and mathematics instructional materials that are “fully aligned” with the Common Core standards at \$483 million.

The state department further estimated that implementing the Smarter Balanced Assessment Consortium (SBAC) assessments aligned to the Common Core standards would increase California's state testing costs by approximately \$10 per student annually, or \$35 million each year. Over seven years, the increase would total \$245 million. This would be added to the state's current testing contracting expenditure of approximately \$54.3 million each year.

Paying More for Less

California's locally-developed academic standards have been judged at least as good as, if not significantly better than, the Common Core standards by one of the strongest advocates for the Common Core: the Fordham Institute.

In English language arts, Fordham rated the California standards an A while the Common Core received only a grade of B+. Similarly, in mathematics, Fordham graded California's standards an “A,” while the Common Core received a score of A-. Other national organizations have also judged California's standards to be among the very best.

The American Federation of Teachers (AFT) judged California's mathematics standards, which were developed in a process led by top mathematicians, as “strong” (the organization's highest rating).⁴

SUMMARY:

In light of these substantial costs, California would benefit from a broader and more vigorous public debate on the topic of adopting the Common Core standards. At a time of extended financial hardship for many local schools, would time and money spent realigning to the Common Core standards constitute the most promising strategy for improving education and increasing student outcomes? Or would this attention, as well as any new funds that could somehow be identified, be better focused on efforts to assist more students in actually achieving the state's current, high academic standards?⁵

Sources

¹ Henry W Burke and Donna Gardner, Education Policy Experts, Do Not Let the DOE Nationalize the Schools in Your State, Education News, September, 2012, <http://educationviews.org/do-not-let-the-doe-nationalize-the-schools-in-your-state-2/#comments>

²ibid.

³ibid.

⁴ Pioneer Institute for Public Policy Research, National Cost of Aligning to Common Core, p. 24 and 25

⁵ibid.

ARE NATIONAL ASSESSMENTS DESIGNED TO MEASURE CCSSI EXCLUSIVELY?

CLAIM: *As a Smarter Balanced governing state, California is a decision-making member. ~ California Department of Education*

FACTS:

The Smarter Balanced Assessment Consortium (SBAC or SMARTER) is a multistate consortium working collaboratively to develop a student assessment system aligned with a common core of academic content standards for English language arts/literacy and mathematics. Smarter Balanced assessments are designed to measure student progress toward college and career readiness. ~ California Department of Education

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 [US] Department [of Education] 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.¹

In addition to adopting Common Core, states were also required to join one of two federally funded testing consortia to be eligible to Race to the Top (RTTT) federal grants. On September 10, 2010, the US Department of Education awarded a total of \$362 million in federal American Recovery and Reinvestment Act (ARRA) funds to two consortia working with states to develop assessments aligned to Common Core Standards. Achieve, Inc.'s Partnership for Assessment of Readiness for College and Careers (PARCC) consortium received \$186 million; while the SMARTER Balanced Assessment Consortium (SBAC) received \$176 million.²

SUMMARY:

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.

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.³

Private organization and trade associations will dictate the content and will not be accountable to the public at large, any state body, or any local school or parent organization. There is no appeal system in CCSS because there was no legislative body that authorized the adoption of these standards.

Sources

¹Pioneer Institute Report, Controlling Education from the Top: Why common core is bad for America, May 2012, p. 6

²US Department of Education, "US Secretary of Education Duncan Announces Winners of Competition to Improve Student Assessments," September 2, 2010, Press Release, <http://www.ed.gov/news/press-releases/us-secretary-education-duncan-announces-winners-competition-improve-student-asse>;

³Pioneer Institute Report, Controlling Education from the Top: Why common core is bad for America, May 2012, p. 14

DO THE AMENDMENTS IN THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT PROTECT STUDENTS FROM PRIVACY INVASION?

CLAIM: *The CDE adheres to the privacy requirements in the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended (20 US C. § 1232g; 34 CFR Part 99), the California Information Practices Act (California Civil Code Section 1798 et seq.), California Education Code Section 49062 et seq., Article 1, Section 1 of the California Constitution, and all other applicable federal and state laws and regulations that safeguard education records, privacy and confidentiality. ~ California Department of Education*

FACTS:

Recent legislative initiatives provide funds for states to develop and implement statewide longitudinal data systems to support data-driven decisions to improve student learning and to facilitate research to increase student achievement and close achievement gaps. These data systems are intended to enhance the ability of states to manage, analyze, and use education data.¹

In documents filed with a federal court in Washington, D.C., Electronic Privacy Information Center (EPIC) is challenging changes to the Family Educational Rights and Privacy Act (FERPA). The revised regulations, issued by the Education Department, allow the release of student records for nonacademic purposes and undercut parental consent provisions. The rule change also promotes the public use of student IDs that enable access to private educational records.²

The US Department of Education is investigating how public schools can collect information on “non-cognitive” student attributes, after granting itself the power to share student data across agencies without parents' knowledge. The feds want to use school to catalogue “attributes, dispositions social skills, attitudes, and intrapersonal resources, independent of intellectual ability,” according to a February DOE report, all under the guise of education.³

Under the DOE's 2011 FERPA reinterpretation, however, any local, state, or federal agency may designate any individual or organization as an “education representative” who can access such data—as long as the agency says this access is necessary to study or evaluate a program. These can include school volunteers and companies. A lawsuit against the regulation is pending.⁴

The Fordham University Law School's Center on Law and Information Policy's *A Study of Elementary and Secondary School State Reporting Systems* finds the privacy of our nation's school children at risk.

The study reports on the results of a survey of all 50 states and finds that state educational databases across the country ignore key privacy protections for the nation's K-12 children.⁵

SUMMARY:

The issues and rights surrounding the privacy and protection of personal information are very complex. The privacy rights provided by law are often not provided in practice and may be further eroded by changes. A push for changes in the established privacy rights is being made to facilitate greater collection and sharing of data by connecting state longitudinal data systems.⁶

In short, the [federal] government wants to collect a dossier on every child, containing highly (...), personal information, without asking permission or even notifying parents. Its officials believe “federal agencies should invest in programmatic portfolios of research” to monitor and influence student attitudes through schools, says the February DOE report.⁷

...each governor in the 50 states had to provide an “assurance” they would pursue reforms... [One] of the assurance[s] governors provided was in the area of data systems. More robust data systems and a new generation of assessments can assist teachers and principals to improve their practices and tailor their instruction in ways that were largely unthinkable in the past.⁸ ~ US Department of Education Secretary, Arne Duncan in an address to UNESCO

Sources

¹Data Stewardship: Managing Personally Identifiable Information in Student Education Records. (2010, Nov.). IES National Center for Education Statistics. SLDS Technical Brief <http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2011602>

² Epic v. the U.S Department of Education, Electronic Privacy Information Center (EPIC)

³ The U.S Department of Education's Data Mining Efforts, Joy Pullman, Truth in American Education, <http://truthinamericaneducation.com/privacy-issues-state-longitudinal-data-systems/privacy-invasiondata-mining/the-u-s-department-of-educations-data-mining-efforts/>

⁴Ibid.

⁵Center on Law and Information Policy: Children's Educational Records and Privacy. Fordham University School of Law <http://law.fordham.edu/center-on-law-and-infotionpolicy/14769.htm>

⁶ Privacy Issues and State Longitudinal Data Systems, Truth in American Education , <http://truthinamericaneducation.com/privacy-issuesstate-longitudinal-data-systems/>

⁷Ibid.

⁸ The Vision of Education Reform in the United States: Secretary Arne Duncan's Remarks to United Nations Educational, Scientific and Cultural Organization (UNESCO), Paris, France. November 4, 2010 <http://www.ed.gov/news/speeches/vision-education-reform-united-states-secretary-arne-duncans-remarks-united-nations-ed>

Ethical Considerations for New Types of Personal Data

“As new forms of measurement emerge and new types of personal data become available, the field must also deal with critical ethical considerations. Of course, privacy is always a concern, especially when leveraging data available in the “cloud” that users may or may not be aware is being mined. However, another emergent concern is the consequences of using new types of personal data in new ways. Learners and educators have the potential to get forms of feedback about their behaviors, emotions, physiological responses, and cognitive processes that have never been available before.”

~ Excerpt from a DOE draft report called Promoting Grit, Tenacity, and Perseverance: Critical factors for success in the 21st century. February 2013

This report can be downloaded from the Stanford Graduate School of Education, <http://edf.stanford.edu/readings/download-promoting-grit-tenacity-and-perseverance-report>

Should the federal government and the bureaucrats within the US Department of Education and other agencies be tracking our children from cradle to grave just because they now have the technology to do so?

“The fantastic advances in the field of electronic communication constitute a greater danger to the privacy of the individual.”

