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**Restoring Local and State Autonomy  
To Strengthen Public Education:  
Testimony Submitted to Utah's 2012 Education Interim Committee**

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**Purpose:** I thank State Senator Howard A. Stephenson and State Representative Francis D. Gibson, Co-Chairs, and other members of Utah's 2012 Education Interim Committee for the opportunity to submit testimony on the deficiencies of Common Core's standards. I also suggest why the legislature is justified in negating the state's adoption of Common Core's English Language Arts Standards and how Utah could develop and assess first-class standards in the English language arts at a relatively low cost.

**Professional Background:** I hold a doctoral degree in reading research and instruction from the Harvard Graduate School of Education. From 1999-2003, I was senior associate commissioner at the Massachusetts Department of Education where I was in charge of revising the state's K-12 standards, professional development criteria, licensing regulations for all educators, and teacher tests in all major subjects. I was appointed to serve on the National Assessment of Educational Progress committee to develop the reading framework for 2009 (2003-2004), the National Mathematics Advisory Committee (2006-2008), Common Core's Validation Committee (2009-2010), and the Massachusetts Board of Elementary and Secondary Education (2006-2010). At the local level, I served as Trustee of the Brookline Public Library (1984-1999) and Town Meeting Member (1984-1994), both elected offices.

I address the following points in my written testimony:

- 1. That Common Core's standards for the English language arts are neither research-based, nor internationally benchmarked. Nor are the percentages for literary and informational reading in the English class supported by research or the NAEP reading frameworks.**
- 2. That Common Core's college readiness standards were designed to lead to intellectually undemanding secondary mathematics curricula and tests to enable all students to enroll in college. We don't know yet what its readiness standards mean for the academic level of its ELA tests, although one can presume they will have similar goals.**
- 3. That state boards of education adopted Common Core's standards under false premises as part of a truncated public comment process and unwittingly transferred control of the local curriculum to the federal level.**
- 4. That Utah can develop and assess first-class standards in the English language arts at relatively low cost.**

## **Background**

The ostensible goal of the Common Core project is to prepare all students for higher education in this country, using common tests based on curricula aligned to Common Core's standards that are developed by testing consortia funded by the U.S. Department of Education. The standards, the tests, and the curricula reflect the USDE's belief that all students should be prepared for college and that the federal government should determine what students learn in English and mathematics to be prepared for college.

State boards of education in 2010/2011 apparently believed that federal officials could establish sounder educational policies for their state than they themselves could, despite lack of evidence that federal officials have ever established effective educational policies in K-12. Board members who voted to adopt Common Core's standards and to join one of the testing consortia developing curriculum and tests seemed willing to believe that implementing something called "college and career readiness standards," giving tests based on them, and making all teachers take professional development in them will make all students ready for college.

**(1) Common Core's standards for English language arts are neither research-based nor internationally benchmarked. Nor are the percentages for literary and informational reading in English classes supported by research or NAEP reading frameworks.**

Common Core provides no comparison of its own sets of standards with any sets of international objectives in English or mathematics. I requested information on international benchmarking many times during my tenure on the Common Core Validation Committee, yet it was never provided. To judge from my own research on the language and literature requirements for a high school diploma in Ireland, British Columbia, Canada, and Alberta, Canada, Common Core's ELA standards fall far below what other English-speaking nations or regions require of college-intending high school graduates. In fact, that is the main reason that I and four other members of the Validation Committee declined to sign off on Common Core's standards.

Nor is there research evidence to support the usefulness of the generic reading skills Common Core offers as "anchor" standards (and as grade-level standards). Common Core's anchor standards are not authentic academic standards. Only authentic academic standards can guide development of a coherent and progressively demanding literature/reading curriculum in K-12, and only such a curriculum can prepare students adequately for a high school diploma, never mind authentic college coursework. Skills, processes, and strategies by themselves cannot propel intellectual development or serve as an intellectual framework for any K-12 curriculum.

Nor is there evidence to support the idea that having English teachers teach more informational reading (or literary nonfiction) and less literary reading will lead to greater college readiness. There is also no research to support Common Core's division of reading into 10 informational and 9 literary standards at all educational levels.

Moreover, an approximate 50/50 division of informational and literary reading in the curriculum is not supported by NAEP's reading frameworks. NAEP makes it clear that the percentages it proposes for types of reading passages are for its tests, not the English curriculum (it has never assessed drama), and that its percentages are intended to reflect the kind of reading students do outside as well as inside school. Common Core's ELA architects have misguidedly applied the NAEP percentages, which are themselves not research-based, to the English curriculum and the ELA college-readiness test, misleading teachers, school administrators, and test developers alike.

**(2) Common Core’s college readiness standards were designed to produce an intellectually undemanding secondary mathematics curriculum and test so that all students can be declared “college-ready.” We don’t know yet precisely what its readiness standards mean in ELA, but we can assume that they were designed with similar intentions.**

Passing a college readiness test in mathematics will not mean that Utah's students are capable of competing in a global economy. It will mean only that they are qualified to enroll in a non-selective community or state college, as Jason Zimba, lead writer of Common Core’s mathematics standards, admitted at a March 2010 meeting of the Massachusetts Board of Elementary and Secondary Education.

We don’t know what passing a college readiness test in English will mean because we don’t yet know how many reading passages will be above a grade 8 readability level and where the cut score will be. The testing consortia have not indicated what readability level “college readiness” means. Does the Utah Department of Education know if the cut score will reflect a readability level of grade 10, 11, or 12 with respect to vocabulary and syntactic difficulty?

**(3) State boards adopted Common Core’s standards under false premises as part of a truncated public comment process and inadvertently transferred control of the curriculum away from local school boards.**

Common Core claims that its standards are research-based and internationally benchmarked. But state boards of education were never given clear information on the research base or international benchmarks before or after a vote to adopt them. Moreover, the Utah State Board of Education did not provide full public discussion before it voted to move control of the curriculum from local school boards to a distant federal bureaucracy.

The USBE tentatively approved the standards two days after they were published (June 4, 2010) to meet a U.S. Department of Education deadline of August 2 and then approved them on August 6, 2010. Despite this short timeline, the Utah State Office of Education website claimed through April 2012 that "They were vetted thoroughly by the Utah State Board of Education and by parents who attended public meetings held across the state prior to the State Board’s unanimous vote to adopt them in 2010." After recent complaints to the USOE about how hearings could have happened in such a short period of time and when no one was aware of them, the claim was removed from the website. Because the USOE website prevents such statements from being archived, the fact that this claim was once made depends on the testimony of those who read it.

Because the USBE did not follow procedures that would have facilitated full public awareness of the deficiencies in Common Core’s English language arts standards, and because Common Core’s English language arts standards are not internationally benchmarked or supported by substantial evidence, it would be reasonable to pass a law negating the Board’s adoption of Common Core’s English Language Arts Standards.

**(4) Utah can develop and assess first-class ELA standards at relatively low cost.**

If Utah negates its adoption of Common Core’s English language arts standards, I volunteer to help Utah develop a first class set of ELA standards. **All I would want paid for are travel expenses.** It would not be difficult for experienced and well-read English teachers in Utah to develop a coherent set of literature standards for K-12. Moreover, most of the new standards could be assessed by the first-rate test items developed by English teachers in Massachusetts for its own state assessments and released annually for public scrutiny.