

Common Core State Standards—Nevada Must Proceed

presented to

The Nevada State Legislative Committee on Education

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In January 2014 the education and broad media became awash with news, editorials, and opinion columns on the controversy over multiple aspects of the Common Core State Standards (CCSS), a national movement currently embraced by 44 states, the District of Columbia, and some US Territories. These new preK-12 education standards have evolved over the last few years initiated by several private foundations, public corporations, and education institutions coalescing through the Council of Chief State School Officers under the overview of the National Governors Association.

The 2010 Nevada Governor's Education Reform Blue Ribbon Task Force was charged with examining Nevada's participation in the US Department of Education's "Race to the Top" competition and recommending bold changes in Nevada's education in order to improve the academic success of its youth. Adoption and implementation of CCSS were recommended throughout the Task Force's final report, "Nevada's Promise—Excellence, Rigor, Equity."

The writing of the CCSS in 2010 was a work-in-progress after the "College and Career Ready" standards had been developed and reviewed by the states, education professionals, decision makers, and the public. Fully recognized by states and those who would implement these standards were the tremendous work ahead and the uncertainties of costs and complexities of the far-reaching components: curriculum writing, content selection, and assessment writing and implementation, all of which were to be consistent with CCSS.

Four years later as participating states are well into the implementation phases and the public, decision makers, educators, and numerous interested parties are becoming knowledgeable of the implications and consequences of this massive effort, much resistance has emerged (erupted) with some states reconsidering their commitments to the standards. (Notably, Indiana has withdrawn March 24, Tennessee is considering delaying implementation, and New York is considering a moratorium for implementation for up to three years.)

The dedication of advocates of CCSS implementation is as determined as that of its antagonists. The point people for this examination that started three months ago were just as determined to remain objective. On the basis of "Nevada's Promise" and the priorities of the then Nevada Superintendent of Public Instruction, James Guthrie, prior to the 2013 legislative session, solid support for implementation of CCSS was present among regional business advocates of education. No less than seven categories of stakeholders/interest groups were identified and the criticism was disaggregated into eight separate, but related, principal issues. From these two sets

emerged a large array of perspectives each reflecting significant implications to current and future resources as well as political capital.

The principal issues are enumerated here:

- A. the *philosophical tension* of national education standards and the federal government's involvement
- B. the challenge of overcoming the *status quo*
- C. the CCSS themselves
- D. the *process* of CCSS creation, development, and adoption
- E. the *development* of curricula by states and districts consistent with CCSS
- F. the *selection process* and *costs* of instructional material and content
- G. the *development process* and *costs* of assessments and testing
- H. the controversy over student/parent data collection

Through our analysis of the arguments and charges against proceeding with implementation of CCSS, the following observations and opinions in relation to these issues are summarized here:

- A. Consistent with the Elementary and Secondary Education Act, the **US Department of Education should not be involved in setting standards** in incentivizing with dollars, in offering “conditional waivers”, nor establishing policy preferences in the setting or implementation of education standards. The responsibility for education outcomes rests with the states and the states alone. Nonetheless, the efforts used for promotion, creation, and adoption of the standards by the CCSSO through the NGA with the financial assistance of private foundations, corporations, and educational institutions is considered appropriate, necessary, and commendable. The public input and stakeholder/interest group/jurisdictional reconsiderations are viewed to be a healthy and necessary response during this stage of implementation leading to greater refinement of CCSS.
- B. **Changes to the status quo** in a movement of this magnitude are large and of significant impact to budgetary and human resources. The solutions to the fiscal realities will, by necessity, be phased in over time by prioritization within each jurisdiction. The human capital adjustments by educational professionals will take commitment and time. The return on investment over the long-term for these changes justifies the effort to achieve implementation. One distinguished educator has advised, “These changes may not be the final form; however, they represent a significant improvement over the existing standards.”

C. Our examination of various aspects of **the CCSS themselves** has raised the following concerns. With each we offer observations and opinions for action:

1. Although the CCSS will be overseen by the NGA's Center for Best Practices and the CCSSO with indications these two custodians will oversee revisions, no specific provisions for amendment to the CCSS have been found. On the basis of some excellent recommendations from various stakeholders/interest groups/jurisdictions and the lack of inclusive amendment provisions, we see that states have little alternative than to withdraw. An effective amendment provision is an important feature to the survival of CCSS.
2. In the English Language Arts (ELA) standards, the displacement of classic literature for larger percentages and greater emphasis on informational text is of great concern. (Reference is made to Dr. Terrence O. Moore's book, The Story-Killers.) (See 7. below.)
3. In the ELA standards, standards for contemporary authors should meet or exceed those considered to be universal literature for each grade level. (Reference is again made to The Story-Killers.)
4. Safeguards should be adopted as a part of CCSS to ensure that "abuses and distortions" (as documented in The Story-Killers) are readily discovered and resolved.
5. In the Mathematics standards, Euclidean geometry should require rigorous proofs (two-column proofs preferred) to emphasize logical thought processes. (This discipline should be delivered concurrently with ELA elements of logical reasoning and argumentative thought.)
6. In the Mathematics standards, pre-calculus with calculus an option should be required. (See 7. below.)
7. Although it is understood that the CCR standards were established to have one set of standards for both college and career, recommendations 2 and 6 above suggest that consideration be given to the bifurcation of "College and Career" standards. The expectations found in the workforce can vary greatly among jurisdictions and disciplines. Although this would represent a departure from the "one standard concept," this should be a major topic of consideration for the standards custodians and not be viewed as a step backwards.

D. The **process of creation, development, review, and adoption** of the standards has drawn great criticism relative to its "lack of inclusiveness" and the qualifications of standards writers. A project of this magnitude and urgency must be conceived and developed by a "seed" group of visionary individuals. The National Governors Association recognized the importance of this approach understanding that the only way uncertainties

could be removed was through exploring various approaches. Although five members of the 29-member CCSS Validation Committee did not affirm the final version (two of whom are outspoken in their criticism), the standards today represent a structure, a framework that can be modified as the implementation evolves. Some have likened this to "...changing the wing of an airplane while in flight." Some have insisted that the standards are "untested, unfounded." While this criticism appeals to many opponents, we find as many advocates who acknowledge that although the process is tracking into "uncharted waters," they are confident the journey is on seaworthy vessels with capable crews determined to reach the intended destination by changing courses where necessary for hazards and storms. Withdrawing from or termination of participation in CCSS is not justified on the basis of the process employed to create them.

- E. **Development of the curricula** is being accomplished on a state-by-state basis with collaboration from jurisdictional members within the two assessment consortia and through many of the websites that have been established by various interest groups who are themselves charged with implementation. This is an appropriate and positive outcome of this nationally concurrent effort as each state will ultimately prepare, review, and adopt its own curricula. Some of these website resources are affiliated with for-profit enterprises and textbook/teaching aids vendors. State and district curricula officials must consider these sources with objectivity to ensure their intended curricula objectives are achieved. There is concern for undue, overbearing influence of textbook vendors on single states or districts in "writing the curricula" to match vendors' products as opposed to selecting the textbooks to fit the curricula. Notwithstanding Dr. Moore's comments in F. below, the efforts to prepare curricula consistent with CCSS are commendable.
- F. **The selection and costs of instructional material and content** has drawn great criticism. Dr. Moore's book has brought to light many examples of "abuse and distortion" by the improper selection of literary works, informational texts, and authors citing "standards" as the justification. As mentioned in C. 4. Above, safeguards must be in place to identify such abuses and distortions with an equitable process to resolve them to preserve authenticity of fact. The costs of acquiring instructional materials could well be a burden on states and district budgets. These fiscal realities must be met with affordable alternatives and/or phased allocations of limited dollars. Digital technology is transforming the development of and access to educational content. Budgeting jurisdictions must recognize that new products, software, hardware, and infrastructure needs will become a growing cost factor. In addition, increased dollar and time resources will be necessary to provide teachers and users of this technology with professional development. Nonetheless, the short-term criticism of this issue is not justification to terminate participation in CCSS. Participating states must discover solutions to fiscal demands of this improvement to education.

G. The issue over **the development and the uncertainty of cost of assessments** is extensive and the source of much criticism. High compliments are due for the establishment of the two assessment consortia (Partnership for Assessment of Readiness for College and Career (PARCC) and Smarter Balanced Assessment Consortium (SBAC)) by participating states with the objective to develop uniform assessments useful to students, parents, teachers, schools, districts, states, and national observers, as well as decision makers. Here are the key points of concern:

1. some assessment result projections suggest that student performance will drop during the transition from existing assessments to the new assessments; because most states' teacher evaluation standards now include a portion of student test scores (a prerequisite to the US DoE's RttT competition), teachers and their education associations are understandably concerned;
2. in addition to the new curricula and lesson planning, teachers are concerned about adequate time and training to adapt to new assessments standards and methodology including "compute adaptive testing";
3. the ministerial complexities, although merely interim in nature, of scheduling the transition of existing classes from one assessment system to the new;
4. conflicts of interest are perceived between textbook/teaching aid providers and the assessment writers;
5. suggestions that assessment criteria should be different for those entering post-secondary education and those entering the military and workforce;
6. concern over the degree of involvement of higher education professionals in establishing the assessment standards; the Achievement Level Descriptors established within SBAC are intended to serve as "readiness indicators" for credit-bearing courses at colleges and universities;
7. uncertainties over the cost of administering assessment examinations to students, e.g., the Los Angeles Unified School District received a proposal for \$1 billion from Apple for iPads for each of its 650,000 students to take examinations; states and districts are shying from implementation of CCSS as a result of these uncertainties.

The concerns raised regarding the development and costs uncertainties over implementation of the assessment function of the CCSS are real and compelling. Nonetheless, the work of the two assessment consortia to reach consensus on uniform testing requirements for students is impressive and commendable. The transition to full implementation will be difficult; however, the overall objective is deemed valid and worthy of the

challenges states are encountering. The criticism over the assessment function is not considered justification for withdrawing from CCSS but may be justification for additional time to address valid concerns.

- H. Statewide Longitudinal Data System (SLDS) development in Nevada has been underway since 2007 after it received two US DoE grants totaling \$10 million. Besides personal data, this system involves the **collection of data** detailing student academic performance and behavior as well as other factors that have a bearing on the student's ability to perform, e.g., health, disabilities, employment, condition of home life. The purpose of collecting this data is to track student performance from year-to-year in order to identify and employ appropriate adjustment to school work to ensure each student is at or ahead of grade level proficiency and on the pathway to graduation. Additionally, the data collection will track teacher, school, and district performance and effectiveness providing administrators, policy makers, and decision makers with critical information regarding allocation of human and budgetary resources. The system is intended to be a key component in education accountability. While access and compromise of sensitive student and family data is of great concern to parents, the public, as well as those charged with administration of this system, its deployment is considered to be a necessary function to the effectiveness of education. Implementation of the SLDS should proceed; however, only aggregated, coded data should be available above the district level.

CONCLUSIONS:

Implementation of CCSS should proceed with renewed determination to achieve its objectives of improving individual student success in public education in the United States, elevating the teaching profession through improved professional development and effectiveness, and enhancing the accountability of public education. The following recommendations are submitted:

- within an agreed period after implementation of CCSS, states shall be given full control of their own standards; states will be accountable for the success of their standards and curricula through assessment outcomes at the 4th, 8th, and 11th grade levels;
- the NGA shall redirect its focus from “common core standards” to nationally uniform assessment standards, i.e., the assessment standards developed by the assessment consortia shall be subject to review and approval by the NGA with recommendation from CCSSO; states shall administer the nationally uniform assessments consistent with the NGA approved program;
- 11th grade assessments shall be based upon the expectations of higher education, the workforce, and military/public service; the 4th and 8th grade assessments shall be based on the consensus of professional educators that

students are “ready to proceed” to the next phase of their education subject to the review and approval of that state’s Board of Education;

- with regard to the three recommendations above, some states may choose standards higher than the “baseline” CCSS standards; provisions must be included in the uniform NGA assessment standards that measure “baseline” competence as well as the “advanced standards” competence for each state; the additional costs for such “advanced” assessments must be borne by each state;
- in spite of the observations referenced in C.7. above, we do not at this time recommend bifurcation of “college and career readiness” standards; we do believe, however, that dialogue should be promptly entertained from all participating jurisdictions, stakeholders, and interested groups to strengthen the standards with regard to this disparity;
- provisions must be promptly established to allow amendments to state education standards through public, stakeholder, interest group, and professional initiatives;
- provisions must be promptly established within each state to allow the review and modification to specific selection of instructional material or content through public, stakeholder, interest group, and professional initiatives;
- states are to have sole discretion in the fiscal aspects of the implementation of their standards, curricula, instructional material, and assessments; alternatives must be established for compliance with the nationally uniform assessment standards as well as the “advanced standards” assessments mentioned above.

REMAINING QUESTIONS:

The following specific questions are submitted to the Legislative Committee on Education to ascertain the current status of some of the issues mentioned in this paper:

1. What is the projected increase in the annual K-12 education budget to cover the costs of the Smarter Balance Assessment program?
2. What is the status of implementation of the Nevada SLDS? Is there an oversight body in place for establishing policies for collection and security of data; for determining which data fields are accessible by teachers/principals; and for establishing policies for sharing “personally identifiable information” vs aggregated data at specific levels?

IN SUMMARY

It was recognized at the beginning of this examination that establishment and implementation of common education standards across the country would be challenging. As the research continued, it was found that its complexity grew at a rate at least as great as our understanding. This paper addresses but a small set of the large issues that have emerged; the countless minor details and ministerial challenges that exist and that will appear must be resolved through collaboration among CCSS engineers and teachers in the classrooms in a determined spirit.

It is anticipated that annual revisits to uniform state-derived education standards will be necessary and appropriate. It is felt that the CCSS program is superior to Nevada's current standards and, therefore, in consideration of the many concerns that clearly have merit and that will be comprehensively addressed, it is believed that the State of Nevada should proceed, *with course corrections as necessary*, with the implementation of CCSS.

*by Daryl Drake, education advocate, taxpayer
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Exhibit A—Background Document

ABSTRACT:

A groundswell of resistance has emerged across the United States in recent months over the implementation of the Common Core State Standards (CCSS) as states begin to educate parents and taxpayers about the importance of this nationwide movement to improve preK-12 education. (As of the end of March, 2014, all but six states have adopted these standards: Alaska, Indiana, Minnesota, Missouri, Texas, Virginia.)¹ The bulk of the criticism surrounds the process of its creation, the method of its state-by-state adoption, issues over development of curriculum and selection of content, the use and costs of technology, development of student assessments, and the perceived conflicts of interest in the writing and publication of textbooks and assessments. Underlying these points is the fundamental issue of federal imposition of national education standards.

Because the discourse has been multi-faceted and has ranged from professional to vitriolic and originating from well-respected state and national organizations and determined participating states to emotional and politically driven outbursts from grass roots assemblies, the authors have been committed to objectivity, rationality, and open-mindedness in their examination of this debate and has chosen to remain detached from these organizations and other critics who espouse strongly held, antagonistic positions.

It should be noted that the final report of the Nevada Governor's Education Reform Blue Ribbon Task Force, "Nevada's Promise", released in November 2010, frequently referenced the importance of implementation of CCSS and its components to our promise to the youth of our state and to the future of Nevada's economic health.²

BACKGROUND:

Because the federal Elementary and Secondary Education Act (ESEA)³ adopted in 1965 and its subsequent renewals prohibit the federal government and any of its agencies or officials from imposing upon states or school districts any curriculum, program of instruction, or selection of instructional materials, the preparation of the CCSS was initiated independently in 2009 through the National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO) with support from various private and corporate foundations that believed the education of our nation's youth must be substantially improved. It must be clearly understood that the CCSS are neither curricula nor material but standards to guide states and school districts in the

¹ Participating CCSS states--<http://www.corestandards.org/standards-in-your-state/>

² "Nevada's Promise: Excellence, Rigor, Equity"--<http://www.nevadaracetothetop.org/resources.html>

³ ESEA--http://en.wikipedia.org/wiki/Elementary_and_Secondary_Education_Act

preparation of their curricula. States and school districts are at liberty to prepare their curricula and select their instructional material unfettered, in theory,⁴ using the guidelines within their states' adopted CCSS. To date the CCSS address two principal disciplines: English Language Arts (ELA) and Mathematics. (Standards for Social Studies and the Sciences are currently being considered by various states.)

An integral part of the development of the CCSS was the preparation of “college and career ready” (CCR)⁵ standards setting forth a set of academic and skill expectations likely to be encountered by high school graduates as they enter the workforce, the military, and higher education. (Notes: a) WCSD led the way for higher standards in Nevada for college readiness by adopting in 2004 “The Gateway Curriculum” for high school students;⁶ b) WCSD’s Education Alliance developed the CCR standards to be adopted locally.⁷) Both the CCSS and CCR documents were publicly noticed for review and input and reviewed for ratification by the CCSS Validation Committee, a credentialed group of approximately 30 individuals with expertise in education, some of whom had, in fact, participated in the writing of the standards.⁸ (Two members of the Validation Committee, Dr. Sandra Stotsky, University of Arkansas, and Dr. James Milgram, Stanford University, have been outspoken in their dissenting opinions of CCSS.⁹) From mid-2009 through 2013, states reviewed the standards through various interest and stakeholder groups. As of December 2013, forty-five states, the District of Columbia, three US territories, and the Department of Defense Education Activity have adopted the CCSS and are in the process of implementation.¹⁰

The State of Nevada adopted the CCSS in October 2010 as the Nevada Academic Content Standards for ELA and Mathematics.¹¹ Because state and district academic officers had been aware of the imminent adoption of the standards, some

⁴ “...unfettered, in theory...”—notwithstanding federal incentives and unfunded mandates that are offered or imposed upon states, e.g., the US DoE’s “Race to the Top” competition eligibility requirements and incentives.

⁵ College and Career Ready--<http://www.corestandards.org/about-the-standards/development-process/>;

⁶ WCSD’s Gateway Curriculum--http://www.washoecountyschools.net/csi/pdf_files/6511_REG_Gateway.pdf

⁷ WCSD’s Education Alliance “College & Career Ready”--<http://www.washoe.k12.nv.us/community/press-releases/2013-02-05/education-alliance-of-washoe-county-offers-guidance-on-career-and-college-readiness>

⁸ CCSS Validation Committee--http://www.corestandards.org/assets/CommonCoreReport_6.10.pdf

⁹ James Milgram, dissenting member--<http://dianeravitch.net/2013/09/11/james-milgram-on-the-common-core-math-standards/>; Milgram, “Review of Final Draft Core Standards--<ftp://math.stanford.edu/pub/papers/milgram/final-report-for-validation-committee.pdf>”; Sandra Stotsky, dissenting member--<http://www.uaedreform.org/downloads/2013/11/common-cores-invalid-validation-committee.pdf>; Stotsky Milgram paper, “Can this Country Survive Common Core’s College Readiness Level?”, Sept 2013--<ftp://math.stanford.edu/pub/papers/milgram/ZimbaMilgramStotskyFinal.pdf>

¹⁰ For a view of the evolution of the CCSS and CCR, the website created by the Council of Chief School Officers, www.corestandards.org, presents a timeline for the preparation, review, and adoption of the standards.

¹¹ http://www.doe.nv.gov/Curriculum_Standards

jurisdictions began the process of preparation of curricula and instructional material and selection of content consistent with CCSS.

A critical component of the CCSS has been the development of new student assessments that are consistent with the new standards and that cover the material in the curricula. In order to develop new assessment systems that are recognized and approved by others, states have collaborated to form two assessment consortiums. Eighteen states, the District of Columbia, and the Virgin Islands established the **Partnership for Assessment of Readiness for College and Career (PARCC)**.¹² Separately, the **Smarter Balanced Assessment Consortium (SBAC)**¹³ was created by twenty-two governing states, one advisory state, and an affiliated US Territory. Both consortia were funded by grants from the US Department of Education's "Race to the Top (RTTT) assessment competition" in September 2010 in the amounts of \$170 million and \$160 million respectively.¹⁴

THE PRINCIPAL ISSUES:

Because much of the voluminous discourse and rancor in the media and in cyberspace is driven by emotions, philosophy, politics (power & control), business (profit and genuine civic responsibility), and other factors, we found it necessary to disaggregate the issues into specific areas:

- A. the philosophy of national education standards and federal government involvement
- B. the challenge of overcoming the *status quo*
- C. the CCSS itself
- D. the *process* of CCSS creation, development, and adoption
- E. the development of curricula by states and districts consistent with CCSS
- F. the selection and *costs* of instructional material and content
- G. the development and *costs* of testing and assessment
- H. the controversy over student/parent data collection

The authors have found it common that criticism of one facet of this movement is used to discredit other areas and, in some cases, is used to demand abandonment of the entire effort, strategies we find shortsighted and short of logic. These issues will be addressed in subsequent pages.

¹² see <http://www.parcconline.org/about-parcc>

¹³ see <http://www.smarterbalanced.org/>

¹⁴ see <http://www.ed.gov/news/press-releases/us-secretary-education-duncan-announces-winners-competition-improve-student-asse>

THE PARTICIPANTS:

Since numerous sources have contributed to the vast array of discourse on the various aspects of CCSS, the authors have felt it necessary to categorize them broadly with examples in parentheses:

1. Government entities charged or “peripherally involved” with implementation (US DoE, state DoEs, school districts)
2. Employee organizations (NEA, state education employee associations)
3. Quasi public/private organizations providing support and guidance for development and implementation of CCSS (NGA, CCSSO, PARCC, Smarter Balance, The Daily Café,)
4. Foundations, Institutes, universities/colleges, Education Organizations (Fordham Institute, Heritage Foundation, Pioneer Institute, StudentsFirst, Parent Teachers Assn,)
5. Newspaper, magazine, journalist publishers/bloggers (The Boston Globe, The Atlanta Journal-Constitution, The Wall Street Journal, Diane Ravitch, The Progressive Investigates, Truthout)
6. Businesses and Business Organizations with interests in education outcomes (US Chamber of Commerce, Editorial Projects in Education, the non-profit publisher of Education Week, Achieve, Inc., National Center on Education and the Economy, Pearson Prentice Hall, McGraw Hill)
7. Politically oriented and grass roots organizations (“Stop Common Core Nevada”, “Stop Common Core NY”, Home School Legal Defense Association)

It is important to know the interests and funding sources of the various participants to understand the positioning, perspectives, and degree of objectivity of each. Some are genuinely intentioned to achieve exponentially higher student success through implementation of the CCSS. Some insist that reversal of negative trends in US education outcomes is essential to economic prosperity, to our national security interests, and to the future of our leadership stature in the world. Some are genuinely concerned that the process was and the final documents are flawed and must be amended. Some are philosophically, hence politically, opposed to federal encroachment on public education or to increased taxation to fund the costs of implementation. Some are employed and charged professionally with successful implementation of an adopted program. Some are intent on positioning their businesses to benefit from significant changes. Some are merely reporting on the merits of this massive movement underway and the discord that is resulting. Others are resistant to changes to existing programs deemed successful.

Where it is not clear in the context of this paper, we will identify in which category an advocate resides.

EXAMINATION:

The authors had become aware of widespread discontent with various aspects of CCSS last fall; however, it was not until mid-January this year the column by syndicated columnist **George Will**, “The rise and fall of Common Core,”¹⁵ and a video lecture “The Story Killers, How the Common Core Destroys Minds and Souls”¹⁶ by **Dr. Terrence O. Moore**, Assistant Professor, Hillsdale College¹⁷ that he became earnestly engaged in examining the charges against CCSS. Indeed, George Will eloquently and credibly submits that the federal government and its bureaucracy are encroaching on “parental empowerment” and, through its \$4.35 billion “Race to the Top” stimulus, has “indirectly” promoted with incentives adoption of national standards in defiance of the federal ESEA. Mr. Will correlates this monumental movement to President Obama’s troubled transformation of the health care industry through the “Affordable Care Act.”

Dr. Moore’s criticism extends well beyond the 40 minute video lecture in his book, The Story Killers—A Common-Sense Case Against the Common Core, copyrighted 2013. Moore is an assistant professor of history whose principal focus challenges the English Language Arts standards in the CCSS.¹⁸ He is relentless in his criticism of the standards and the abuses and distortions he finds in the curricula and course materials that are “demanded” by CCSS and concludes that these abuses, *in addition to many others described in detail*, amount to neglect of classical literature¹⁹ and to distortions of interpretation of America’s founding documents,²⁰ the abolition of slavery,²¹ and the use of nuclear weapons to end WW II.²²

Dr. Moore presents in the final chapter of his book an alternative to the ELA standards within the CCSS by providing a curriculum for a four-year high school,²³ an endeavor with which he has been instrumental through establishment of nine charter high schools through Hillsdale College’s Barney Charter School Initiative.²⁴ Because

¹⁵ Reno Gazette Journal, January 20, 2014

¹⁶ “The Story Killers”, a lecture by Dr. Terrence O. Moore--
<http://www.youtube.com/watch?v=2npftvFvkWo&feature=youtu.be&t=5m49s>

¹⁷ Dr. Terrence O. Moore, Hillsdale College--<https://kirbycenter.hillsdale.edu/page.aspx?pid=688>

¹⁸ Introduction, page 8, The Story Killers—A Common-Sense Case Against the Common Core, by Terrence O. Moore

¹⁹ Page 93, Chapter 8--“Absurdities, Bias, and Lost Opportunities”, *ibid*

²⁰ Pages 128-129, 137, *ibid*

²¹ Pages 134-136, *ibid*

²² Pages 233-234, *ibid*

²³ Pages 237-263, Chapter 9--“A True Common Core”, *ibid*

²⁴ <http://www.hillsdale.edu/outreach/charterschools>

his education and background is history and literature, Moore says little about the Mathematics standards in the CCSS. (Dr. James Milgram, dissenting member of the CCSS Validation Committee, has voiced strong concerns over the inadequacy of the Mathematics Standards for college-bound students.²⁵)

Further research through web sources has revealed other concerns related to the evolution of the CCSS and its adoption and implementation. Of particular note has been the involvement of the **textbook industry**. Because school districts nationally and historically have relied on textbook vendors to provide course materials for the classroom, because textbook publishers also provide “teachers’ editions” to assist educators in developing lesson plans, exercises, and tests, and because those same textbook providers suggest test and assessment topics consistent with their textbook material, this industry has been present throughout the development of the CCSS to make recommendations and to ensure that their materials are in alignment with CCSS. **Pearson Prentice Hall**²⁶ and **McGraw-Hill**²⁷ are two of the publishers that have had significant influence in this process. Not surprisingly, much of the criticism related to the CCSS process has referenced the businesses and industries that both influence the outcome and benefit from it.²⁸

One individual with links to the publishing industry has drawn much attention by CCSS critics. David Coleman, a Rhodes Scholar and considered to be the architect of the CCSS, founded The Grow Network, a company purchased by the McGraw-Hill publishing company in 2004 for \$14 million. He left the publishing company in 2007 and started Student Achievement Partners, which received a \$6.5 million grant from the Gates Foundation for its role in writing CCSS. In late 2010 Coleman became a founding member of Michele Rhee’s StudentsFirst organization as treasurer and was chosen as President of the College Board, a leading company in student assessments, in October 2012.²⁹

The **student assessment** component has drawn great attention in recent months now that states are well into implementation of the new curricula because of 1) the high costs of administration of assessments, 2) the technology (hardware and software) requirements, 3) the impact assessments will have on teacher evaluations

²⁵ Dr. James Millgram, dissenting member, CCSS Validation Committee--
<http://dianeravitch.net/2013/09/11/james-milgram-on-the-common-core-math-standards/>

²⁶ Pearson website--<http://www.pearsoned.com/at-fetc-pearson-announces-prentice-hall-literature-common-core-edition-for-middle-and-high-school/- .UyOCWF4URJM>

²⁷ McGraw-Hill website--<http://www.commoncoresolutions.com/>

²⁸ As one example, the Atlanta Journal-Constitution published in its August 25, 2013 edition the article, “Common Core as a Brand Name. Who is making money off the new standards?”

²⁹ David Coleman, “architect of CCSS”--http://en.wikipedia.org/wiki/David_Coleman_%28education%29;
[http://dianeravitch.net/2012/05/19/who-is-david-coleman/;](http://dianeravitch.net/2012/05/19/who-is-david-coleman/)

and professional development, and 4) the complexities in transitioning from existing assessment programs to the new assessments aligned with CCSS.

In order to grasp the magnitude of the student assessment issue, it is important to understand how testing and assessments have been accomplished prior to the adoption of CCSS. For the purposes of this paper, an in-depth history is not necessary. A brief description of the principal assessment programs currently in use and frequently referenced follows:

- National Assessment of Education Progress (NAEP)³⁰—Administered by the Commissioner of Education Statistics, National Center for Education Statistics, US Department of Education. A 26-member Governing Board, created by law in 1988, is appointed by the Secretary of Education but independent of the DoE, is responsible for developing the test specifications that serve as a blueprint for the assessments. The subjects assessed and reported on a national level are mathematics, science, reading, writing, the arts, civics, economics, geography, and US history and are administered to 4th, 8th, and 12th grade students. (Beginning in 2014, technology and engineering literacy will be included.) Four subjects (math, science, reading, and writing) are reported on a state level. (Trial Urban District Assessments (TUDA) began in 2002 with the “No Child Left Behind” program and is administered about every 2 years. National Long Term Trend (LTT) assessments were begun in the ‘70s in math and reading and are given every four years.) *NAEP does not provide scores for individual students or schools: the intent of NAEP assessments is to measure progress nationally and by participating states to show trends and gaps.*
- Criterion-Referenced Tests (CRT)—A criterion-referenced test is a type of test that is intended to determine if a student has learned the material for which the student is being tested, i.e., a standards-based assessment.³¹ It contrasts with “norm-referenced assessments” and “ipsative assessments.” A norm-referenced assessment is intended to determine the ranking of an individual test taker within a population of test takers and *not necessarily* if a test taker has learned the material being tested. In an ipsative assessment a test taker’s results are compared to a previous performance. In Nevada, CRTs are administered annually to students in grades 3-8 in mathematics, reading, and science.³²
- Nevada High School Proficiency Examination (NHSPE)—The NHSPE is a CRT assessment administered to high school sophomores, juniors, and seniors in mathematics, reading, and science. An “analytical writing” exam is a part of the NHSPE administered to juniors and to seniors who fail the exam as juniors. All portions of the NHSPE are pass/fail.³³ (Note: *With Nevada’s adoption of the*

³⁰ NAEP--<http://nces.ed.gov/nationsreportcard/about/>

³¹ CRT--http://en.wikipedia.org/wiki/Criterion-referenced_test

³² Nevada CRTs--http://www.doe.nv.gov/Assessments_CRT/

³³ Nevada High School Proficiency Exam (NHSPE)--
<http://www.leg.state.nv.us/Division/Research/Publications/EdDataBook/2013/2013EDB.pdf>, pages 167-173

Common Core State Standards (CCSS) in June 2010, a plan for developing an assessment system that would be aligned to the CCSS was recommended. To this end, Nevada's Department of Education joined the Smarter Balanced Assessment Consortium (SBAC) to develop the new assessment system. Beginning with the 2014–2015 school year, the current CRTs will be replaced with assessments created through the SBAC.)

- The Advanced Placement (AP) Program--The College Board administers the AP Program, which provides opportunities to students in grades 10 through 12 to experience college-level courses while in high school. The AP program includes 35 courses and examinations in 20 subject areas and consists of a three-year sequence of course work in a specific subject. The course work culminates in rigorous examinations held in May of the graduating year. The AP examinations are scored on a five-point scale, with 5 being the highest mark attainable. The course work in a given subject is generally equivalent to a first-year college course. As a result, a student who achieves a 4 or 5 is usually permitted to skip the corresponding course as a freshman in college. (In the 14 WCSD high schools offering the AP program in 2013, 58% of students were enrolled in at least one AP course.)³⁴
- The International Baccalaureate (IB) Program—Also administered by the College Board, the IB Program offers programs of international education to a worldwide community of schools. There are more than 1.1 million IB students in over 144 countries. The IB Program consists of four programs for students aged 3 to 19. The programs were designed to develop the intellectual, personal, emotional, and social skills to live, learn, and work in a rapidly globalizing world. Two high school programs are offered through the IB Program: the Diploma Program is a two-year curriculum leading to final examinations and a qualification that is welcomed by universities around the world; the Career-Related Certificate (IBCC) incorporates the vision and educational principles of the IB Program into a unique offering specifically designed for students who wish to engage in career-related learning. (In the one WCSD high school offering the IB program, Wooster High School, 37% of the students were enrolled in at least one IB course in 2013.)
- The SAT—The SAT is a standardized test that serves as a college admissions examination. Students register and pay a fee for the examination, which is administered by the College Board, an association of over 5,900 schools, colleges, universities, and other educational institutions. (Of the 3,301 WCSD graduating seniors in the 2013 graduating class, 48.3% took the SAT.) *This examination is not an assessment used as a requirement for high school graduation.*
- The American College Testing (ACT) Examination—The ACT is a college readiness examination, a standardized test for high school achievement and college admissions in the US. The test covers mathematics, English, reading,

³⁴ WCSD student participation rates provided by WCSD

and science reasoning. It is administered by ACT, Inc. (Of the 3,301 WCSD graduating seniors in the 2013 graduating class, 38.6% took the ACT.) *This examination is not an assessment used as a requirement for high school graduation.*

- The International Activities Program (IAP) is administered by the National Center for Education Statistics, a department within the US DoE.³⁵ Within IAP are several assessment programs intended to compare education achievement in various subjects among approximately 60 countries worldwide. Frequently referenced are Trends in International Mathematics and Science Study (TIMSS), Program for International Student Assessment (PISA), and Progress in International Reading Literacy Study (PIRLS). These exams are administered to a sampling of students: for TIMSS in the US, approximately 20,000 4th and 8th grade students from 1,000 schools; for PISA, the subjects are math, reading, and science literacy for 15 year old students; and for PIRLS, reading achievement and reading behaviors for 4th grade and equivalent students. *These programs are not an assessment used as a requirement for high school graduation. They are intended to provide comparative achievement levels of participating countries. It should be noted that there are frequent debates related to the demographics of the sample test takers in various countries suggesting the comparative rankings are distorted.*

These are the principal formal assessments that have been used to determine student proficiencies. Equally important are the routinely scheduled exams, quizzes, essays, and other exercises teachers employ in classrooms throughout the country in order to determine if their students are learning the material being covered. These are important learning activities intended to prepare students for formal assessments and to ascertain specific areas in which individual students need assistance.

The CCSS Assessment concept: the adoption of CCSS compelled states to revisit student assessment to determine if individual students are acquiring the knowledge and skills presented in curricula consistent with CCSS and recognized by participating states. As described above, two consortia, PARCC and SBAC, were established in 2010 through collaboration among participating states, the District of Columbia, and US territories. Because Nevada joined the SBAC Consortium, only the SBAC program is described:

The SBAC is developing a system of valid, reliable, and fair next-generation assessments aligned to the CCSS in English language arts/literacy (ELA/literacy) and mathematics for grades 3-8 and 11. The system—which includes both summative assessments for accountability purposes and optional interim assessments for instructional use—will use “computer adaptive testing”³⁶

³⁵ International Activities Program, TIMSS, PISA, PIRLS--<https://nces.ed.gov/surveys/international/>

³⁶ Computer Adaptive Testing--<http://www.smarterbalanced.org/smarter-balanced-assessments/computer-adaptive-testing/>

technologies to the greatest extent possible to provide meaningful feedback and actionable data that teachers and other educators can use to help students succeed.

The assessment criteria are extensive and address content specifications by grade level and specific CCSS criteria.³⁷ *(Of interest here are the ELA content criteria addressed by Terrence Moore in his book: informational text 50%, literary text 50% in grades 3-5; informational text 55%, literary text 45% in grades 6-8; informational text 70%, literary text 30% in grade 11.)*

The draft initial Achievement Level Descriptors (ALDs) and college content-readiness policy framework are part of a critical effort to ensure that the grade 11 summative assessment can be used as evidence that students are ready for entry-level, transferable, credit-bearing courses in English and mathematics and should be exempted from remedial coursework.³⁸

PARCC and SBAC were funded by RTTT grants from the US DoE. PARCC has been managed by Achieve, Inc.,³⁹ an independent, non-partisan, non-profit education reform organization dedicated to working with states to raise academic standards and graduation requirements, improve assessments, and strengthen accountability. Achieve is funded through contributions from several major corporations and philanthropic foundations including, among many others, IBM, Cisco, DuPont, Alcoa, Intel Foundation, The Bill and Melinda Gates Foundation, and The William and Flora Hewlett Foundation. In addition to managing PARCC, Achieve provides technical assistance on CCR standards to states and manages the “Next Generation Science Standards” (NGSS) development effort. (In February 2014, the Nevada SBoE adopted the Nevada State Science Standards consistent with the NGSS to become the 10th state to do so.⁴⁰) Some pundits, The Progressive Investigates and Truthout, have been questioning and critical of the influence Achieve and its contributing members have had on education matters and the development of CCSS.⁴¹

³⁷ Smarter Balanced Assessment, ELA Content Specifications—
<http://www.smarterbalanced.org/wordpress/wp-content/uploads/2011/12/ELA-Literacy-Content-Specifications.pdf>

Math Content Specifications--<http://www.smarterbalanced.org/wordpress/wp-content/uploads/2011/12/Math-Content-Specifications.pdf>

³⁸ Achievement Level Descriptors and “college content-readiness policy”--
<http://www.smarterbalanced.org/achievement-level-descriptors-and-college-readiness/>

³⁹ Achieve, Inc. website--<http://www.achieve.org/about-us>

⁴⁰ Nevada adopts State Science Standards--
http://blogs.edweek.org/edweek/curriculum/2014/02/nevada_adopts_common_science_s.html;
<http://www.nextgenscience.org/nevada-officially-adopts-ngss-illinois-poised-follow>

⁴¹ The Progressive Investigates-Public School Shakedown--<http://www.publicschoolshakedown.org/more-on-the-common-core-achieve-inc-and-then-some>; Truthout, a progressive organization--<http://www.truthout.org/news/item/18442-flow-chart-exposes-common-cores-myriad-corporate-connections>

JURISDICTIONAL/ORGANIZATIONAL RESISTANCE

In the past several months, several states have questioned some of the provisions of CCSS and assessments and withdrawn from the assessment programs due to content and costs. (The Los Angeles Unified School district is considering the merits of a proposal to provide its 650,000 students with iPads at a cost of \$1 billion.⁴²) Because of the backlash of CCSS, several states are renaming their adopted standards in order to deflect the criticism.

As described in The Heritage Foundation's publication, The Foundry, the **State of Indiana**, a strident supporter of CCSS at the beginning, has become the poster child among those states questioning its merits.⁴³ "Prior to adopting Common Core, the state had some of the best-rated standards in the country and a system in place for revising them every six years. The latest set was implemented only in a few grades statewide in the 2011-12 school year. For opponents of Common Core, Indiana is a trailblazer," reports the Foundry March 11.⁴⁴

The Fordham Institute, which is pro-Common Core, was among the tough critics of Indiana's CCSS implementation, "Because of Indiana's long history of setting clear and rigorous standards for English language arts, arguably no state was better positioned to customize [Common Core] in a way that made the expectations even stronger than the Core. And yet—remarkably and inexplicably—Indiana state officials have managed to do the opposite: draft ELA [English/language arts] standards that are worse than either of the documents they hope to replace."⁴⁵ On March 24, the governor signed legislation withdrawing the state from CCSS and requiring the state to establish its own standards.

Tennessee, which was the first state winner of the federal "Race-to-the-Top" competition (\$501 million grant in 2010)⁴⁶ and which ranked 22nd overall in the nation in Education Week's 2013 Quality Counts Report, is another example of states considering delaying implementation of CCSS. On March 13, the Tennessee House voted overwhelmingly (81-11) to delay implementation of the standards and the PARCC

⁴² LA Unified School District--<http://laschoolreport.com/la-unified-board-sees-a-digital-future-maybe-without-ipads/-more-16615>

⁴³ The Foundry—"Crisis for Common Core—Indiana's Uncommon Ruckus Over Education Standards", March 11, 2014--http://blog.heritage.org/2014/03/11/crisis-common-core/?utm_source=heritagefoundation&utm_medium=email&utm_content=DD430_140311&utm_campaign=dailydigest

⁴⁴ *ibid*

⁴⁵ *ibid*

⁴⁶ Tennessee the first RTTT grantee--<http://www.tn.gov/firsttothetop/about.html>

assessment program until June 2016.⁴⁷ The measure must be approved by the state Senate and signed by Republican Gov. Bill Haslam who has been a solid supporter of CCSS in spite of resistance from Republican legislators. Although the state is in its third year of implementation, many, including teachers, have raised concern about the ELA, math, and history curricula and insist on additional time to adjust these new standards. The governor's office has responded, "Tennessee has come too far to go backward. The governor will continue to stand up for higher standards and relevant testing of those standards."

The **New York** legislature is considering a moratorium on implementation of CCSS for up to three years.⁴⁸ Legislative leaders are concerned about the impact of phased implementation on student testing and the impact on teacher evaluations.

The **National Education Association (NEA)**, the teachers union, has been supportive of CCSS and its implementation process early on. Many states, school districts, and education associations have been critical of the standards adopted during the Bush administration known as "No Child Left Behind" (NCLB). The CCSS promised to be a significant improvement with less onerous compliance criteria. Nonetheless, the NEA announced on February 19 resistance to elements of the CCSS, "NEA President: We Need a Course Correction."⁴⁹ The NEA president reported, "I am sure it won't come as a surprise to hear that in far too many states implementation has been completely botched. Seven of ten teachers believe that implementation of the standards is going poorly in their schools. Worse yet, teachers report that there has been little to no attempt to allow educators to share what's needed to get CCSS implementation right. In fact, two thirds of all teachers report that they have not even been asked how to implement these new standards in their classrooms.So, where do we go from here? NEA has been called upon to oppose the standards. It would be simpler just to listen to the detractors from the left and the right who oppose the standards. But scuttling these standards will simply return us to the failed days of No Child Left Behind (NCLB), where rote memorization and bubble tests drove teaching and learning. NEA members don't want to go backward; we know that won't help students. Instead, we want states to make a strong *course correction* and move forward."

OBSERVATIONS:

⁴⁷ WATE-TV, Knoxville, March 14, 2014--<http://www.wate.com/story/24980937/east-tenn-educators-divided-over-common-core-house-vote>

⁴⁸ New York state considering moratorium--<http://www.capitalnewyork.com/article/albany/2014/03/8542601/klein-everyone-agrees-common-core-moratorium>

⁴⁹ NEAtoday, February 19, 2014--<http://neatoday.org/2014/02/19/nea-president-we-need-a-course-correction-on-common-core/>

Because news of criticism of CCSS is unfolding daily, the authors concluded their examination late-March 2014 recognizing that new developments will emerge. The purpose of this examination is to measure the merits and detriments of this massive, national movement that is in its fifth year of existence and to offer an opinion to the Nevada State Board of Education (NSBoE), state legislators, and the governor. It is the authors' understanding that the Legislative Committee on Education or the NSBoE will conduct a public hearing in the weeks ahead to assimilate the objections and concerns of Nevada citizens.

Although this examination has extended to countless sources and involved personal discussions with individuals directly involved with or knowledgeable about CCSS and Nevada's standards/implementation, to include all would create a document too lengthy for practical purposes. It is important to assess the value of CCSS and regional, state, and national criticism in order to establish positions on its various elements. The authors have always understood that a movement of this magnitude would require a period of years, even decades, to evolve. As more information becomes available from students, parents, teachers, administrators, and policy makers on success stories and shortcomings, it is reasonable to expect that further examination will be essential.

The observations and opinions of the issues set forth on page 3 of this paper are addressed below:

Issue A—Philosophy of National Standards and the Federal Government's Involvement

The authors agree with the federal ESEA prohibiting the federal government's reach into state and school district policies, standards, curricula, and content and will advocate in support of that prohibition. It is believed, further, that measures initiated by the US DoE in the form of "linked incentives" and mandates are intrusive and result frequently in higher costs in the delivery of education throughout the country. This is not to say that the authors do not support the commitment of this country, through its states, to provide a quality education to all its youth. The determination of the allocation of resources (human capital and funding for operating and capital budgets) for preK-12 education should be made by each state on the basis of its own priorities.

The authors do see the benefits of establishing "baseline" standards and expectations of academic performance and personal responsibility for students that are recognized throughout the nation and its territories. These baseline standards must be rigorous and comprehensive enough to meet CCR standards. Those states (and school districts) determined to differentiate themselves from other jurisdictions to maintain standards above the baseline standards *should be at liberty to do so*.

It is also believed that the attribute of uniformity is essential to accommodate student transfers from one jurisdiction to another, to establish competency expectations for students enrolling in higher education institutions regardless of jurisdiction, and to establish academic and skill expectations for high school graduates entering the US military or the workforce, public and private.

Issue B—Overcoming the Status Quo

The authors have recognized that resistance to new standards would emerge during the implementation process, primarily from parents, teachers, and administrators. Lesson plan preparation, adjustments to elements and order of curricula, higher academic and skill expectations, and new assessment methodologies all place greater demands on educators.

In recent years and because of federal incentives from RTTT competition, teacher evaluation reforms have been adopted by many states requiring consideration of student performance on those evaluations. The implementation of these new evaluation standards has been lengthy yet has yielded great benefits to educators as the evaluations serve as a basis for individual professional development opportunities. Nonetheless, the variables and uncertainties of student outcomes during the transition to CCSS and adopted assessments has resulted in demands for additional implementation time for educators to become fully knowledgeable and prepared for the classroom. This is an understandable concern and the authors believe adequate time should be provided for these adjustments. Additionally, education curricula at colleges of education throughout the country must be adapted to prepare student teachers for the new standards.

Issue C—The Common Core Standards

As of this date the CCSS have been established for Mathematics and English Language Arts. Efforts are underway to complete the Next Generation Science Standards. Both adopted standards are lengthy and address performance expectations for each grade level. The authors have not studied each standard nor the order or grade level at which each should be mastered. It is fully recognize that these standards do not constitute a curriculum and that each state/school district will prepare its own curricula and select its own instructional material (see Issue E below).

However, the authors are aware of criticism that does have merit in both disciplines and those concerns are herewith registered:

Mathematics

- In the delivery of Euclidean geometry, rigorous proofs based upon logical steps and proofs (two column proofs preferred) are essential to link with standards in ELA for logical reasoning and argumentative thought.
- Students should complete pre-calculus prior to graduation, i.e., geometry, trigonometry, and Algebra 2 with pre-calculus should be successfully completed.

ELA

- Standards for universal literature (ancient, classical, European, English, and American) should not be diminished in importance or inclusion and, ideally, should be scheduled in parallel with periods covered in social studies and history curricula.
- Standards for materials by contemporary authors should meet or exceed those considered to be universal literature.
- Standards for “informational text” should ensure that such works are relevant to developing literacy and writing skills and do not displace classical literature.⁵⁰
- Safeguards should be adopted by CCSS to ensure that “abuses and distortions” as documented by Dr. Terrence O. Moore in his recent book, The Story Killers—A Common-Sense Case Against the Common Core, are readily discovered and resolved. (This is not to be construed as “censorship” but to ensure integrity of fact.)

The authors fully recognize that those who are resisting the adoption of the CCSS because they insist it is fundamentally flawed cannot necessarily be categorized as “clinging to the status quo.” It is incumbent upon education leaders to evaluate valid concerns of opponents in order to make adjustments deemed necessary and appropriate.

The authors maintain that the journey to transform preK-12 education must begin. Yet the journey must rely on dedicated, professional educators to achieve the objectives set forth in CCSS with the understanding that appropriate revisions will emerge, be reviewed and adapted, adopted, and implemented routinely during the years ahead.

Additionally, states should provide opportunities for input by students, parents, and teachers regarding the appropriateness of material and skills expected of students.

Issue D—*Process of CCSS creation, development, review, and adoption*

The authors have been well aware of our state’s preK-12 ranking nationally, our state’s graduation and proficiency rates, and the incidence of remedial classes for entering freshmen at Nevada’s colleges and universities. It is critical that a commitment exist to ensure that current policies are effective and that necessary reforms are adopted and implemented to improve student outcomes and demonstrate to Nevada’s parents that our state is determined to elevate its standing in all metrics in national rating reports.

Yet the consistent decline of our country’s ranking among the advanced nations of the world in mathematics, reading, and science (11th to 21st in reading, 20th to 24th in science, and 25th to 31st in mathematics since 2009) as reported last December by

⁵⁰ see Sandra Stotsky paper, September 9, 2013, pages 3-4--
<http://www.uaedreform.org/downloads/2013/11/common-cores-invalid-validation-committee.pdf>

OECD's PISA results⁵¹ cannot be ignored. It is believed this decline is a manifestation of multi-faceted factors, three of which are multi-generational societal shifts in a) the perceived value of education, b) parental engagement in their children's education, and c) expectations of student performance and behavior.

The trend of the deteriorating condition of US preK-12 education, in the authors' opinion, imperils both our political and economic leadership throughout the world and represents a vital concern to the fundamental national security of our country. It is imperative that this trend is reversed and that adoption and implementation of higher preK-12 standards be initiated. CCSS is a first step in that transition.

The magnitude and urgency of this transformation are comparable to the "Sputnik" challenge America faced close to sixty years ago. To our collective credit, our country rose to the occasion and within a decade had transformed education and industry to new heights through the revolution of technology and systems management.

To conceive a program of nationally recognized education standards of this dimension, it must start with a seed, a small group of determined, creative, and competent individuals who have available the time and resources. (One cannot forget that our Declaration of Independence was written behind closed doors by a small group of determined, creative, and competent individuals who did not always agree!) While most of the "grass roots" critics of the CCSS development process rail against the "big dollar corporations and foundations" for their "dominant yet veiled" roles, the authors submit that many of the same critics would be cynics of the same effort had it been in the hands of a few "political appointees and bureaucrats."

The authors respond to this criticism, "If it were not for these corporate, big dollar citizens, this ship's keel would not have been laid." A similar massive, daunting, national initiative is recalled that was launched in the '50's that was politically charged, exorbitantly expensive, multi-generational, benefited thousands of corporations large and small, and continues to require perpetual infusions of taxpayers dollars to maintain. Yet, it represented one of the greatest stimuli to our country's prosperity since the transcontinental railroad system of the 19th century. The interstate highway system is infrastructure of concrete and steel for commerce and mobility; our preK-12 education system is the infrastructure of learning and ideas for the minds and creativity of our children.

The authors view the process of creation and development of the CCSS as necessary and appropriate. We are now in the phase of implementation and like the "continuous maintenance of our highways," our country must commit to routine, inclusive investment in these standards to ensure their effectiveness.

ISSUE E—*Development of Curricula*

⁵¹ Wall Street Journal, December 3, 2013, "US High School Students Slip in Global Ratings"--
<http://online.wsj.com/news/articles/SB10001424052702304579404579234511824563116?mod=djemalertNEWS>

As mentioned earlier, the actual development of preK-12 curricula and the selection of instructional material is, appropriately, a responsibility of states and their school districts. In spite of some of states delaying implementation or threatening the delay of implementation, we have seen regional examples of impressive progress in the preparation of curricula consistent with CCSS in the WCSD and the Carson City School District. (WCSD has been recognized recently for its work with teachers and its lead in the early implementation of CCSS.⁵²)

Interestingly, as a consequence of school district budget constraints during the “Great Recession” many districts have delayed textbook purchases/replacements. In many cases, curriculum writers are using older textbooks as references only and have been restructuring curricula and writing their own class materials consistent with CCSS, often in digital format. This material is being shared with teachers to assist in the preparation of lesson plans.

A growing number of websites exists to provide districts and teachers with assistance in understanding the CCSS, revising curricula, selecting materials, and writing lesson plans.⁵³ Some of these are affiliated with enterprises with a profit motive, some with non-profit foundations, some with writers of the CCSS. Districts and teachers are at liberty to review these resources and choose those most appropriate for their purposes.

Nonetheless, as mentioned earlier in this background paper the observations of Dr. Terrance Moore, curricula developers and writers must be sensitive to the validity and legitimacy of sources being considered. Like much of the material available on the internet, it must be verified.

The progress of curricula writing throughout the country is scattered for a number of reasons. With persistence, time, and a spirit of continuous improvement, it is felt this element of CCSS implementation will be achieved.

ISSUE F—*Selection and Costs* of Instructional Material and Content

Perhaps the most consequential aspect related to the success of the transformation of preK-12 education is the actual content that meets the eyes of students. Criticism abounds about the conflicts of interest with suppliers and vendors of educational materials and the influence of those enterprises on all levels of education decision makers. Criticism also abounds regarding the potential for selection of

⁵² The Fordham Institute, a non-profit organization dedicated to the reform of primary and secondary education, recently released a new report that highlights WCSD as a national leader and “Creative Early Implementer” of these standards. The group bases its findings on the fact that the district received no major new funding for implementation, but instead creatively approached existing resources and built on partnerships with national experts to roll out the new standards to teachers, students, and the community.

⁵³ Examples: Tools for the Common Core Standards—<http://www.commoncoretools.me>; Common Core Guide—<http://www.schoolimprovement.com/company/about-us/>; Common Core Conversation--<http://www.commoncoreconversation.com>; The Daily Café—<http://www.thedailycafe.com>; Achieve the Core—<http://www.achievethecore.org>; Pearson preK-12 Education--<http://www.pearsonk12.com/>

inappropriate content, e.g., material that is biased or inaccurate, content that is substandard or does not convey to the student the intended learning objectives.

Equally divisive is selection of material that may be inconsistent with thoughts, beliefs, traditions of various ethnicities, nationalities, or religious beliefs. Indeed, the authors are aware of the growing burdens placed on today's educators to accommodate these differing views held by many who are new to this country and to America's tolerance for these cultural differences. *The authors submit that instructional materials selected must not neglect the values of our own country at the expense of being sensitive to the toleration of values of others.*

Running concurrently with these concerns is the fundamental change states and school districts are faced with today in budgeting and selecting instructional material: a) the "Great Recession" has ravaged state and district budgets for acquisition of new textbooks, and b) the textbook industry is transitioning from "hard textbooks" to "digital textbooks." No doubt, the digital delivery of textbooks is here and will be a large part of the future. The dilemma education faces today is adapting to "the delivery" of those digital textbooks: "Moore's Law"⁵⁴, more a conjecture than a law, has accurately predicted the obsolescence rate of hardware and software at 18-24 months with a projection that it could extend to 36 months. The capital costs of replacing computers and other tech devices necessary for the delivery of digital textbooks are large and continuing. Instructional material itself is transforming from reading material to video/audible and interactive venues. Although completion rates are mixed, on-line learning and "massive online open courses" (MOOCs)⁵⁵ are becoming more common and are offered by well-respected universities, e.g., Harvard, MIT, as alternative forms of education. Education today is at the cusp of shifting its allocation of capital costs among "bricks and mortar" and these various new venues.

Not surprisingly, as tech devices and software applications evolve, the requirement for teacher professional development increases. While some educators embrace these tech advances, some believe they consume valuable classroom time and are a diversion from the actual learning experience of students. Occasionally, pockets of passionate resistance to these peripheral issues are shifted inappropriately to opposition of CCSS. The issues are distinct yet the resolutions must be complementary.

The cost factor of delivering instructional material is real and continually changing. While it is somewhat peripheral to the matter of CCSS, it is a factor to which states and districts must adapt as they make choices in instructional material selection. It is believed that the setting of technology standards allowing for compatibility and interconnectivity will become a priority in order to achieve affordability across all jurisdictions.

ISSUE G—Development and Costs of Testing and Assessment

⁵⁴ Wikipedia, Moore's Law--http://en.wikipedia.org/wiki/Moore%27s_law

⁵⁵ Massive Open Online Courses--<http://www.mooc-list.com/>

“Teachers spend too much time teaching to the tests!” is a ubiquitous refrain in many circles. Another is that textbook providers actually control assessment and testing content, representing a conflict of interest when districts consider adoption of assessment programs.

As mentioned earlier, teacher evaluations are now linked statutorily in most states to some degree of student success. Hence, teachers have a stake in the outcomes of the assessments administered to their students. The intent of teaching is that the material and skills taught are appropriate for the student’s academic competence level and that the student learns the material and skills. The purpose of the assessment is to measure with validity the breadth and depth of the material and skills learned.

The two consortia established by states (funded by federal dollars) to develop programs of effective student assessment, PARCC and SBAC, are well grounded and represent the appropriate way to establish assessment standards. Again, we see this as an evolutionary process subject to refinement. Additionally, states and districts are faced with the complexities of scheduling the end of existing assessment programs and the beginning of the new programs. This is an inevitable transition the country must endure with the expectation that the criticism will subside as the programs are learned and implemented.

Nonetheless, the authors are concerned with the costs of implementing assessment programs consistent with the PARCC and SBAC programs. As mentioned earlier a proposal that the Los Angeles Unified School District is currently considering satisfies the assessment function only: iPads for each of its 650,000 students and 3 years of software estimated to cost \$1 billion. The proposal is considered, therefore, financially improbable. Assessment providers must work more closely with jurisdictions to conceive effective programs and alternatives with sustainable costs.

Again, the authors believe this is an important issue related to CCSS; however, its resolution is distinct and its challenges should not serve as a justification to abandon CCSS. State decision makers must, however, be able to ascertain that costs of acceptable implementation alternatives (human capital and operating/capital budget costs) are fiscally possible before proceeding.

ISSUE H—*Collection of Student/Parent Data*

It has been a long-term objective of professional educators and elected officials to enhance accountability mechanisms within our education system which are currently replete with vague measurements of effectiveness. Measuring educator effectiveness, assessing student progress, correlating student outcomes with success in higher education, formulating effective professional development plans, and establishing justification for policy decisions and resource allocations are among the reasons taxpayers, elected officials, and education professionals have pursued reliable methods of measuring and improving accountability.

Since 2007, Nevada has received two US DoE grants totaling \$10 million for the development of a Statewide Longitudinal Data System (SLDS) that will capture student,

teacher, school, and district performance on a year-to-year basis. Data quality and compatibility are two integral elements of this system that will track a student progresses through grade levels and into higher education or the work force and track a teacher at whatever grade level and school assigned. Success of students, effectiveness of teachers, and effectiveness of individual schools will be tracked and evaluated to learn when a particular student drifts from the pathway to graduation, to ascertain the nature of a professional development program for a teacher, and to determine how well a principal is leading assigned schools during his/her administrative career. The mantra for SLDS is: “Better data, better decisions!” The authors have been supportive of this program since learning of its objectives and methodology on the condition that only aggregated, coded data be accessible above the district level to protect student/family anonymity.

A key element of SLDS to track student progress is discovering and recording factors in his/her life which effect academic performance and behavior, e.g., homelessness, criminal/gang activity, drug abuse, a parent’s incarceration, a student’s employment to ease the financial stress of a student’s family, a medical or disability condition. Such information is critical for a student’s teacher and principal to understand and address that student’s needs.

Access to sensitive and confidential student/parent/family information is critical and protocols for access should be established and strictly observed by all participants in the system. Violations of such protocols must be strictly enforced at all levels in order to ensure that such information is not compromised. The authors fully recognize critics’ concerns about this issue; however, it is strongly believed that the benefits of this system, once fully implemented, will serve to improve preK-12 education in Nevada and other states.

The CEE WG does not believe that the criticism surrounding data collection pursuant to SLDS is reason to abandon CCSS.

IN SUMMARY:

The authors, in preparing this paper, acknowledge that the CCSS are drawing great concern and criticism now that the public, stakeholders, and decision makers are becoming fully aware of the standards, its principles, and its objectives. Many are now learning of the costs of implementation, the obvious but inescapable conflicts of interest, the potential for abuse and distortion of instructional material, the deviation from “tried and true” knowledge and skills, the perception that the process should have been more inclusive, that more time is necessary to implement the related components of these new standards, and many other perceived damaging aspects of this change.

The authors share the valid and legitimate concerns presented by Dr. Moore in his book, The Story Killers—A Common-Sense Case Against the Common Core, as cases in which the concept of the Common Core is inappropriately used to justify displacement of universal literature from the curriculum thereby marginalizing the great lessons of literature or used to discredit American values through presentation of biased or inappropriate material. Yet, unlike other critics of CCSS, in the spirit of offering alternatives, Dr. Moore presents a “four-year high school” curriculum emphasizing the

importance of his fields, history and ELA. Because his curriculum is not a set of standards, the inference is that from his curriculum standards should be written.

It is in that spirit that the authors conclude that the energies being expended on the criticism of the CCSS be converted to a mutual dedication by the participants to amend the standards and the related components to “form and substance” that truly becomes the “infrastructure for the minds and creativity of America’s youth.”

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