Minutes of the Regular Meeting

**of the Massachusetts Board of Elementary and Secondary Education**

**June 22, 2010**

**8:30 a.m. – 1:15 p.m.**

**Department of Elementary and Secondary Education**

**75 Pleasant Street**

**Malden, MA 02148**

Members of the Board of Elementary and Secondary Education Present:

**Maura Banta**, Chair, Melrose

**Harneen Chernow**, Vice Chair, Jamaica Plain

**Gerald Chertavian**, Cambridge

**Michael D'Ortenzio Jr.**, Chair, Student Advisory Council, Wellesley

**Beverly Holmes**, Springfield

**Jeff Howard**, Reading

**Ruth Kaplan**, Brookline

**Paul Reville**, Secretary of Education, Worcester

**Sandra L. Stotsky**, Brookline

**Mitchell D. Chester**, Commissioner of Elementary and Secondary Education, Secretary to the Board

Members of the Board of Elementary and Secondary Education Absent:

**Thomas E. Fortmann**, Lexington

**Dana Mohler-Faria**, Bridgewater

Chair Maura Banta called the meeting to order at 8:30 a.m.

**Comments from the Chair**

Chair Banta welcomed Board members to the June regular meeting, and used the chair's prerogative to take public comment out of turn.

**Public Comment**

* Kim Holt, director of Leadership Enrichment Adventure Project, Aidan Wilcox, a 10th grade student at Chapel Hill Chauncy Hall School in Waltham, and Molly Rookwood, an 8th grade student at Ottoson Middle School in Arlington, addressed the Board on Model United Nations.
* Joanne Frustaci addressed the Board on gifted and talented education.
* Tyrone Mowatt addressed the Board on gifted and talented education.
* Aimee Yermish addressed the Board on gifted and talented education.
* Gerry Mroz addressed the Board on differentiated instruction for all students.
* Lauren Provo addressed the Board on gifted and talented education.

Board member Sandra Stotsky asked and confirmed that there is an advisory council to the Board on gifted and talented education. Ms. Yermish said she chairs that council, and that the council has asked to meet with the commissioner but not been invited to do so. Dr. Stotsky said a 2002 report from the Department on gifted and talented programs provided a lot of data and a review of research literature and could be a useful source of information.

Board member Gerald Chertavian said he would want to know more about gifted and talented education before responding to the issue presented, and asked the commissioner to help Board members gain that background information. Board member Jeff Howard said this area has well organized and mobilized parents, and there needs to be a balanced discussion to avoid the risks of an over-focus on gifted and talented students. Chair Banta said the Board and Department would take a balanced approach.

**Comments from the Chair**

Chair Banta on behalf of the Board congratulated Michael D'Ortenzio Jr. on his re-election as chair of the State Student Advisory Council. Chair Banta said she was pleased to attend the Teacher of the Year awards and was moved by the ceremony and the educators heralded on that day.

**Comments from the Commissioner**

Commissioner Chester updated the Board on a series of CCSSO-sponsored workshops he attended in London, England the previous week. The commissioner discussed the work of the Boston Public Schools with its turnaround schools, noting that Boston is the first district to complete the local stakeholder process and used the expedited process in the statute. The commissioner said the other eight school districts are completing their local stakeholder process and will begin bargaining shortly.

**Comments from the Secretary**

Secretary Reville said he attended a conference on early childhood literacy last week with Commissioners Chester and Killins. Secretary Reville noted that 69 percent of middle and upper income students achieve literacy by grade 3, while 65 percent of low income students do not.

Secretary Reville provided the Board with an update on the state budget and said the federal Medicaid reimbursement program was still being debated in Congress. The secretary said he recently attended community planning meetings in Worcester for the district's turnaround plans, and participated in the announcement of the Paul Revere Innovation School in Revere, which is set to open this fall. Secretary Reville said that he and Saeyun Lee from his staff will make a presentation later in the meeting on the work of the Readiness Centers. The secretary said the informal P-20 council will meet again this summer and focus on early literacy and college and career readiness.

# Approval of the Minutes

Dr. Stotsky asked that the minutes be amended to reflect her comments during the last meeting on the inclusion of PTO members on the Task Force on Evaluation of Teachers and Administrators. Chair Banta asked for a motion to amend the minutes by striking the word "or" from the item 3 on page 7.

**On a motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education approve the minutes of the May 25, 2010 regular meeting, as amended by striking the word “or” from item 3 on page 7, and the May 24, 2010 special meeting.**

The vote was unanimous.

**"High School Quiz Show" Winners**

Commissioner Chester welcomed WGBH President and CEO Jon Abbott, WGBY- Springfield Vice President and General Manager Rus Peotter, and WGBH Executive Producer of "High School Quiz Show" Hillary Wells. Mr. Abbott thanked Commissioner Chester and Department chief of staff Heidi Guarino for their support, and said as this year's show comes to an end, he hopes this is the start of a Commonwealth tradition. Mr. Abbott also acknowledged Mass Teachers Domain, a collection of digital resources for educators, and said there are 500,000 registrants nationwide and nearly 25,000 registrants in the Commonwealth for a special Massachusetts version.

Mr. Abbott congratulated students from Longmeadow High School and presented them with their championship trophy. Longmeadow High School Assistant Principal Paul Dunkerley introduced student team members Kevin, Lindsay, and Spencer, and acknowledged student members Ryan and Alex, who were not able to attend.

**Annual Performance Evaluation of the Commissioner**

Vice Chair Harneen Chernow chaired the committee of Board members, which included Chair Banta, Tom Fortmann, Beverly Holmes, and Ruth Kaplan, that conducted the Commissioner's annual performance evaluation. Vice Chair Chernow said the committee met twice and evaluated the commissioner in four areas: (1) Effectiveness in supporting the Board's work; (2) Effectiveness in building external support; (3) Effectiveness in managing the Department and staff; and (4) Effectiveness in raising student performance. The commissioner received an overall performance rating of Meritorious.

Vice Chair Chernow said the Board appreciated the commissioner's effort to communicate with members before each meeting and through weekly electronic updates. The vice chair said she saw the commissioner as a strong leader, and appreciates the humor he instills into his work. The vice chair said the commissioner enjoys being with students and engaging with students. Chair Banta said she appreciated the commissioner’s efforts and results. Board member Michael D'Ortenzio Jr. commended the commissioner for his timeliness and for keeping contact with members, and said it was noteworthy that the commissioner did not receive a pay raise.

Ms. Holmes said she enjoys a positive relationship with the commissioner, and that he has navigated a challenging environment. Ms. Holmes told the commissioner that he has a lot more to offer, and that the Board looks forward to his continued leadership. Dr. Stotsky said she appreciated the commissioner's regular memos and telephone calls. Secretary Reville said he appreciated the commissioner's deep commitment and responsiveness to the Board. Board member Gerald Chertavian said that in a challenging year, the commissioner performed incredibly well. Mr. Chertavian said there are a lot of complex changes at the state and federal level, and it is essential to have clarity in both thought and purpose. Ms. Kaplan said she appreciated the opportunity to engage one-on-one with the commissioner, and said she never felt pressured to change her view on any matter. Ms. Kaplan said the atmosphere on the Board is one of mutual respect and civility, and she also commended Chair Banta for that.

Board member Jeff Howard said the commissioner's engagement with the Proficiency Gap Task Force is a model for how an executive should work with a committee. Dr. Howard said a concern of his continues to be the crosswalk between Board priorities and the work of the Department, and the Board needs to spend more time on larger priority issues.

Commissioner Chester said he appreciated the support and feedback from the Board and was humbled and grateful for the opportunity to serve. Commissioner Chester said he is grateful for an excellent staff, which deserves praise as well.

**On a motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education approve the Commissioner's performance rating of "Meritorious" as recommended by the Board's committee.**

The vote was unanimous.

**Proposed Regulations to Implement Anti-Bullying Statute**

Commissioner Chester said it is challenging for schools to prevent and respond to bullying, and it is often difficult to sort through what is bullying and what isn't. The commissioner said the proposed regulations are part of a larger set of activities, including working with statewide organizations and Elizabeth Englander from the Massachusetts Aggression Reduction Center to provide training, vetting a model bullying policy, identifying funding to support district efforts, and providing a no-cost option to school districts for yearly training of staff and students.

Associate Commissioner John Bynoe said the crux of the law is reporting and investigating, but the larger context is school climate and culture. Mr. Bynoe said the Department is vetting a draft of the model bullying policy with a variety of stakeholders and the Department anticipates posting it on the Web by mid-July. Mr. Bynoe added that this initiative will connect with the work of the Behavioral Health Task Force.

Ms. Kaplan asked if a video could be created for the yearly training of staff. Mr. Bynoe said the Department is looking at video and web-based tools. Ms. Kaplan asked about protection for publicly-funded students who attend special education private schools. Department counsel Dianne Curran said the law applies to approved private special education schools as to public schools, and all private schools are covered by some provisions of the law. Ms. Kaplan said there may be instances where a parent believes his/her child is bullied, but the principal does not, and asked if a parent has the right to be notified of a report of bullying. Attorney Curran said the parent does have to be notified. Attorney Curran said the statute defines bullying to mean repeated instances, not a single act. Ms. Kaplan said it is important that a parent's perception of bullying is credited. Mr. Bynoe said that anyone who witnesses bullying is to report it, and the law requires the school to follow up and document its actions in writing. Ms. Kaplan said she hopes the model plan is sent to parents. Mr. Bynoe said the law requires school districts to provide information to parents. Ms. Kaplan asked how these regulations would work with existing sexual harassment policies. Mr. Bynoe said other policies would remain in force and should be coordinated with this law.

Ms. Holmes asked if there were any guidance for a principal to determine when it is appropriate to go to a local law enforcement agency. Mr. Bynoe said the Department is encouraging schools to build upon their existing relationships with law enforcement and is working with the Attorney General’s office and local school officials to provide further guidance. Ms. Holmes asked how many schools have resource officers, and when told that the Department does not have that information, suggested collecting it. Vice Chair Chernow said the recent Globe article shows how murky some bullying situations can be, and asked what tools would be available for schools.

Commissioner Chester said this is a challenging area, and the regulations are only one part of the guidance we will provide. The commissioner said a number of school districts have productive relationships with law enforcement, and we are trying to capitalize on those best practices.

Ms. Kaplan asked about any provision for students with severe disabilities who might engage in bullying. Attorney Curran said the answer would be in special education law, and it would not be treated as bullying if it was a manifestation of the student's disability.

Dr. Howard said he saw reference to witnesses but no definition of what a witness is, and that there needs to be some guidance for witnesses because they have a critical responsibility. Mr. Bynoe said this would be part of the model plan, which could allow for anonymous reporting. Dr. Howard said the emphasis should be on clear guidance for witnesses. Commissioner Chester noted that the most promising programs in reducing bullying focus on peer culture, school climate, and the role of bystanders or witnesses. Dr. Stotsky suggested that teacher training should address the teacher’s role in preventing and addressing bullying.

**On a motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education, in accordance with M.G.L. c. 69, § 1B, and c. 71, § 37O, as added by Chapter 92 of the Acts of 2010, hereby authorize the Commissioner to proceed in accordance with the Administrative Procedure Act, G.L. c.30A, § 3, to solicit public comment on the proposed Regulations on the Anti-Bullying Law, 603 CMR 48.00, as presented by the Commissioner. The proposed regulations concern the school’s notification to parents/guardians and, under certain circumstances, to the local law enforcement agency, as required by M.G.L. c. 71, § 37O (d) (viii).**

The vote was unanimous.

**Regulations on Innovation Schools, 603 CMR 48.00**

Commissioner Chester said the statute requires the Board to adopt regulations on virtual schools. He said the draft regulations were sent out for public comment, and the Department has summarized those comments. The commissioner said changes to the proposed regulations include removing a requirement that the sending school district's superintendent sign off on a student attending a virtual school in another district. Commissioner Chester said some people want to see this opened as widely as possible, and there was a fair amount of concern about what basis a superintendent would use to decide whether or not to approve sending a student to a virtual school. The commissioner said these regulations on virtual schools are under the broader Innovation Schools statute. He explained the revised provision in the regulations relating to waivers, which the statute allows. Commissioner Chester said the challenge with these regulations is how to foster innovation while protecting students. He committed to reviewing and revisiting this matter on a yearly basis.

Ms. Kaplan asked what a virtual innovation school is. Associate Commissioner Wulfson said it's a school in which students take their coursework at home with the coursework delivered electronically over the Internet. Any course or program would involve 80 percent or more of a student's work done online. Ms. Kaplan asked if the district where the school was located is responsible to ensure the quality of school. Mr. Wulfson said yes. Dr. Howard said he was very uneasy about this and that it could lead to an atomized approach to education if not carefully implemented. Dr. Howard said he would have less of a problem if there were a cap on enrollment. Dr. Stotsky asked how you evaluate or determine if a contracted partner is doing a proper job. Mr. Wulfson said the notion of the Innovation Schools statute is that this is the responsibility of the local school committee. Deputy Commissioner Jeff Nellhaus said school districts are held accountable for Innovation Schools in the same manner as with traditional schools. Dr. Stotsky said she was concerned that local school committees could give contracts to favored groups. Dr. Stotsky said she would like to see the regulation changed to require teachers in virtual schools to either hold a license or pass a subject matter test, as with charter school teachers. Associate Commissioner Wulfson noted that the waiver provision in the regulations could cover this.

Vice Chair Chernow said she was concerned about students not relating to other students for multiple years. The vice chair said her vision would be one online school, open to all students, and run by the state. In response to a question about oversight of waivers, General Counsel Rhoda Schneider said Innovation Schools are meant to be break-the-mold schools, but the Board and commissioner have a constitutional duty to see to it that all publicly-funded students are getting an adequate education. Mr. Chertavian questioned an approach that would open these schools broadly rather than focusing on students for whom this technology would be very beneficial. Mr. Chertavian said the private sector may see financial opportunity here, but it seems misguided to open this too broadly before we see how it may unfold.

Commissioner Chester said the changes in the proposed regulations brought to the Board were a result of internal deliberations and the comments of the advisory committee. Mr. Wulfson said the initial goal was to start small and focus on students who would benefit. In the public comment, the Department heard that would be a hard process to manage. Commissioner Chester said he sensed the Board was not at all comfortable or feeling widely positive about this. The commissioner said a tendency to want to over-regulate would work against innovation.

Mr. D'Ortenzio Jr. said he would like to see in the regulations give preference to those students who would benefit the most. Secretary Reville said this is the marriage of a couple of separate ideas, including the autonomies given to charter schools and a desire to see this work done internally within a district. The secretary said virtual learning should be part of a larger conversation.

Mr. Wulfson said that one school district is particularly interested in this idea and is planning to open a virtual school this fall. Mr. Chertavian asked what Greenfield's goal was. Mr. Wulfson said Greenfield is looking to start a K-8 virtual school that enrolls 400-500 students in year one, mostly from outside Greenfield. Mr. Chertavian said the outcome has not been well articulated. Ms. Holmes said she wants to consider this further before venturing into uncharted territory. She asked if anyone has a profile of the student who would be in a virtual school. Ms. Holmes said the Board needs to explore the pros and cons of this measure. Dr. Howard said before any vote the issue of caps needs to be resolved.

Secretary Reville asked whether the Board could separate out the Innovation Schools language and vote on that first. General Counsel Schneider said the Board could do that, but that it would also have to remove the definition of a virtual Innovation School. Secretary Reville said he was detecting a certain discomfort around the table and that the Board may need to spend more time thinking this through.

Dr. Howard said the Board needs to spend more time discussing enrollment criteria and caps. Vice Chair Chernow said it was hard to envision 4- and 5-year-olds having to use technology all day long. Dr. Stotsky said there should be something to address the evaluation and qualifications of the educators in these schools. Dr. Howard said the schools should focus on the students most in need. Mr. Wulfson said it is not clear how the Department would operationalize a statewide cap on enrollment. Mr. D'Ortenzio Jr. said he would like to underscore the idea of preferences for enrollment. Ms. Holmes said she would want to be clear on the Department's oversight of virtual schools.

Chair Banta said it was clear that the Board was not ready to vote on this matter.

**On a motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education amend the motion by striking out the definition of a "virtual innovation school" under 48.02 and strike in its entirety section 48.05.**

The vote was unanimous.

**On an amended motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education, in accordance with M.G.L. c. 69, § 1B, and c. 71, § 92, and having solicited and reviewed public comment in accordance with the Administrative Procedure Act, G.L. chapter 30A, § 3, hereby adopt the Regulations on Innovation Schools, 603 CMR 48.00, as presented by the Commissioner. The proposed regulations implement the statute on innovation schools, M.G.L. c. 71, § 92, added by section 8 of chapter 12 of the acts of 2010.**

The vote was unanimous.

Chair Banta encouraged Board members to tell the commissioner what additional information the Board needs. Ms. Holmes said we need clarification on the profile of the student who would be a candidate for this type of school. Vice Chair Chernow said she would like to hear about the experience in other states and wants to explore the notion of a certain percentage of students coming from the home district. The vice chair also said that people are looking for a cap. Mr. Wulfson said the Department would need to consider if it has the authority to set a cap through the regulations.

**Schedule for Regular Board Meetings through June 2011**

The Board voted to adopt the schedule of regular meetings for the 2010-2011 session.

**On a motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education approve the schedule of regular meetings through June 2011, as presented by the Commissioner.**

**Tuesday, September 21, 2010**

**Tuesday, October 19, 2010**

**Tuesday, November 16, 2010**

**Tuesday, December 21, 2010**

**Tuesday, January 25, 2011**

**Monday, February, 28, 2011**

**Tuesday, March 22, 2011**

**Wednesday, April 27, 2011**

**Tuesday, May 24, 2011**

**Tuesday, June 28, 2011**

The vote was unanimous.

Vice Chair Chernow had to leave the meeting at 11:45 a.m.

**Readiness Centers: Presentation by Executive Office of Education**

Secretary Reville and Executive Office of Education (EOE) Policy Analyst Saeyun Lee made a presentation to the Board on Readiness Centers.

Mr. Chertavian asked operationally what these Centers look like, what services they provide, who staffs them, and how are they held accountable. Ms. Lee said that some regions have multiple sites. Ms. Lee said Readiness Centers are virtual sites, and for instance in central Massachusetts, leadership comes from three groups – the Massachusetts Elementary School Principals Association, Fitchburg State College, and Worcester State College. Ms. Lee said most Centers are moving to deliver services and promote conversations on how partners can join together to provide services. Ms. Lee said multiple regions are convening high school and college faculty to talk about curriculum alignment. Ms. Lee said the Readiness Centers are not legislatively mandated, but rather EOE has developed memoranda of understanding with each region.

Mr. Chertavian asked how EOE will know if the Centers are successful. Secretary Reville said at this point we are not investing tax dollars, but rather are asking people to come together and provide virtual partnerships.

Dr. Howard asked if Readiness Centers do better by focusing on 3-5 goals and doing them well, or by spreading themselves more broadly. Secretary Reville said when we have the resources to mandate a particular agenda, we will be in a better position to narrow the focus. Secretary Reville said the concept will evolve over time, and closing gaps is the top priority.

**Report of the Proficiency Gap Task Force: Commissioner’s Recommendations**

Chair Banta said that discussion of the commissioner’s response to the Report of the Proficiency Gap Task Force would be moved to the Board's special meeting in July.

**State Student Advisory Council End-of-Year Report**

Chair Banta said that Mr. D'Ortenzio Jr.'s end-of-year report of the State Student Advisory Council would be moved to the Board's special meeting in July.

**Update on State Education Budget**

Commissioner Chester said we are still waiting for the final FY11 budget, which is now in conference. The commissioner said a key development will be whether the U.S. Congress extends the Federal Medical Assistance Percentages (FMAP) reimbursement. Once the Conference Committee budget is delivered, the Governor will then have ten days to veto any items and sign the budget.

Commissioner Chester said this remains a stressed fiscal climate. He said two years ago the state funded technical assistance to school districts for gifted and talented students, but now that line item has been zeroed out. The commissioner said that last year the Legislature approved a consolidated literacy line, but that line has been funded at half the level of previous years. The commissioner said that federal dollars for literacy are finished as of September and the state's literacy office has been funded through those federal dollars; there are no state dollars to fund those positions.

**Update on Common Core Standards Review**

Chair Banta referred members to a memorandum (see Appendix) distributed by Dr. Stotsky to Gene Wilhoit from the Council of Chief State School Officers. Dr. Stotsky said she sent her statement to all of the individuals who had supported her membership on the Common Core Standards Validation Committee. Dr. Stotsky said she was one of five individuals on the 25-member Validation Committee who did not sign off on the final Common Core Standards.

Commissioner Chester said we now have a final version of the Common Core Standards. The commissioner said he would forward materials to Board members a week in advance of the July 21, 2010 special meeting at which he will present a recommendation on whether or not to adopt the Common Core Standards. The commissioner said he expected the Board's discussion to be very deliberative.

Deputy Commissioner Nellhaus said the Department has convened two panels to review the Common Core Standards and present a report to the Board. The committees are chaired by George Viglirolo (English Language Arts) and Diane Kelly and Glenn Stevens (Mathematics). Deputy Commissioner Nellhaus said he anticipated that WestEd, which is under contract from the Massachusetts Business Alliance for Education, would complete its external study of the Common Core Standards around July 15th. Ms. Kaplan asked if the Board would be receiving any additional public comments. Deputy Commissioner Nellhaus said there is a survey on the Department's website that allows users to rate the state's current standards against the Common Core Standards along five dimensions. Commissioner Chester said the Department will prepare a summary of all the comments. Dr. Stotsky asked where on the Department's website the revised draft state standards documents could be found. Deputy Commissioner Nellhaus said the Department notified principals, superintendents, and others about those documents, which are also available on the Department's Curriculum page. Dr. Stotsky said it would be helpful to have an additional link on the Department's home page.

Dr. Stotsky said she would like to discuss the meaning of college readiness in math; for example, whether a college- ready test would determine that students are ready to take in their first year of college algebra for credit. Commissioner Chester said the assessments relating to the Common Core Standards have not yet been determined. Deputy Commissioner Nellhaus said the Common Core Standards in math go beyond the state's current standards for the grade 10 MCAS test. Commissioner Chester said that the grade 10 MCAS tests are not meant to assess college readiness, and that is the goal of the common assessment.

**Update on Common Assessment Consortium**

Commissioner Chester said the U.S. Department of Education has allocated $350 million to support consortia of states to develop common assessments of two kinds: grades 3-8 and high school; and solely high school. The commissioner said that Massachusetts is participating in two consortia – the Partnership for Assessment of Readiness for College and Careers (PARCC) and the State Consortium on Board Examination Systems (SCOBES). Commissioner Chester said he was selected to chair the PARCC consortium, and that the state's participation will require more demanding academic performance of our students.

Commissioner Chester said the National Center on Education and the Economy (NCEE), which is leading the development of SCOBES, has long advocated for the United States to develop a more European approach to secondary school with a core course of study through age 16. Students would then participate in an assessment, and based on the results some might choose to go right into college. The commissioner said this would be a four-year development project.

Dr. Stotsky expressed her concerns about NCEE as project manager, citing the turnaround partner that worked with Holyoke. Dr. Stotsky said that there is no evidence for the efficacy of the America's Choice high school program. Commissioner Chester said America's Choice is a for-profit spinoff of NCEE, and NCEE focuses on broader policy issues and has studied other systems outside of the United States. He said it is worthwhile to see what we can learn from other nations. Dr. Stotsky said that a researcher concluded the University of Cambridge exams are not on a par with the MCAS ELA exam in grade 10; the O-level is minimal and only the A-level is for real college entry.

Dr. Howard had to leave the meeting at 1:03 p.m.

Dr. Stotsky asked which students would benefit by taking the exam in grades 10 and 11 and enrolling in an open admissions college rather than staying in high school. Commissioner Chester said he sees potential for grade 10 to be a gateway for a variety of paths; he is not wedded to the model of a tiered-exam system but wants to explore its potential.

Mr. Chertavian had to leave the meeting at 1:07 p.m.

Dr. Stotsky suggested that 30-40% of high school students should be pushed harder, particularly in math, and asked where the pressure was if a student could go into an open admissions college rather than stay in high school. Chair Banta said that Dr. Stotsky was asking good questions, and the Board will continue to discuss these issues in the future.

Commissioner Chester said his goal is to bring to the Board in July the information the Board needs in order to make a decision on the Common Core Standards. The commissioner thanked Dr. Stotsky for the major role she has played in the Common Core effort. The commissioner also thanked Deputy Commissioner Jeff Nellhaus and Associate Commissioner Bob Bickerton. Chair Banta also thanked Dr. Stotsky and all Board members for their time and attention.

**Next Meeting**

The next meeting of the Board of Elementary and Secondary Education is a special meeting scheduled for Wednesday, July 21, 2010, at the Department of Elementary and Secondary Education in Malden.

**On a motion duly made and seconded, it was:**

**VOTED: that the Board of Elementary and Secondary Education adjourn the meeting at 1:15 p.m., subject to the call of the chair.**

The vote was unanimous.

Respectfully submitted,

Mitchell D. Chester

Commissioner of Elementary and Secondary Education

and Secretary to the Board

**Appendix – Submitted by Sandra Stotsky**

June 6, 2010

Mitchell Chester, Commissioner of Education, Massachusetts

Charles Quigley, Center for Civic Education

Susan Wolfson, Association of Literary Scholars, Critics, and Writers

Vance Ablott, Triangle Coalition

Michael Petrilli, Thomas B. Fordham Institute

William Gorth, Pearson Evaluation Systems

David Saba, American Board for Certification in Teacher Excellence

Peter Wood, National Association of Scholars

Barbara Davidson, StandardsWork

Leonard Sax, National Association for Single Sex Public Education

Gene Wilhoit, Council of Chief School State Officers

Dane Linn, National Governors Association

Dear Gene and Dane,

I feel that I owe you, as well as all the individuals and organizations that recommended me for Common Core’s Validation Committee, an explanation for why I could not sign off on the final version of the Common Core State Standards. I did not sign off because I could not “validate” the criteria we were given to affirm. All members of the Validation Committee were asked to affirm that the final version of Common Core’s mathematics and English language arts standards met the seven criteria below. My reasons for not signing off relate to the standards for English language arts, with a focus on the secondary grades, 6-12.

1 “Reflective of the core knowledge and skills in ELA and mathematics that students need to be college- and career-ready.”

In my judgment, Common Core’s standards for grades 6-12 do not reflect the core knowledge needed for authentic college-level work and do not frame the literary and cultural knowledge one would expect of graduates from an American high school. The standards do require familiarity with foundational U.S. documents in grades 9-12, foundational works in American literature in grades 11/12, and a play by Shakespeare in grade 12, but there is little else with respect to content in lower grades. These minimal requirements, laudatory in themselves, would not be considered adequate to frame a literature and language curriculum in any country. In addition, the distribution of literature and informational standards indicate about a 50% division between imaginative literature and informational texts in the English language arts/reading class at all grade levels, a division that is inappropriate at the secondary level given English teachers’ academic background and what they are prepared to teach based on their undergraduate or graduate coursework. Moreover, there is an implementation issue that is not addressed; Common Core does not make it clear that English teachers will need to take academic coursework (or a significant amount of specific professional development) in history and political science to understand the historical context, philosophical influences, unique features, and national and international significance, historically and today, of the foundational documents they are being required to teach students how to read.

2. “Appropriate in terms of their level of clarity and specificity.”

Many standards are paraphrases of the “anchor” “college and career readiness standards.” Many others are unclear in meaning, not easily interpretable, or unteachable. The “college and career readiness standards” that govern all grade-level standards have no discernable academic level; for the most part, they are simply a set of poorly written, confusing, content-empty, and culture-free generic skills with no internally valid organization of their own. They cannot serve the function academic standards are intended to serve—to frame a curriculum with common intellectual goals that build coherently from grade to grade. Nor can they (or do they) serve to generate academic grade-level standards in coherent learning progressions. (See Milgram and Stotsky, 2010, for a detailed explanation.) Moreover, they dictate a muddled and prescriptive approach to vocabulary study.

3. “Comparable to the expectations of other leading nations.”

The two English-speaking areas for which I could find assessment material (British Columbia and Ireland) have far more demanding requirements for college readiness. The British Commonwealth examinations I have seen in the past were far more demanding in reading and literature in terms of the knowledge base students needed for taking and passing them. No material was ever provided to the Validation Committee or to the public on the specific college readiness expectations of other leading nations in mathematics or language and literature.

4. “Informed by available research or evidence”

No evidence was ever provided to the Validation Committee supporting the specific “college and career readiness standards” as a group and their use as an organizing scheme for generating grade-level standards. In fact, the evidence that can be located is either counter-evidence or misinterpreted evidence (see Stotsky and Wurman, 2010). Nor is there clear evidence that career readiness is similar to college readiness.

5. “The result of processes that reflect best practices for standards development.”

I am unaware of any study providing information on “best practices” for standards development aside from my own published work in a Brookings Institution publication (Stotsky, 2004) and a Peter Lang collection of essays (Stotsky, 2000) and my own recommendations to Senate and House Committees on Education in the Ohio and New Jersey legislature (Stotsky, 2009a; Stotsky 2009b). Based on my experience in the Massachusetts Department of Education from 1999-2003, where I was in charge of the development or revision of Massachusetts K-12 standards in all major subjects, and on my extensive experience in local government on a variety of committees for different boards, my judgment is that almost every aspect of the process in which Common Core’s standards were developed profoundly violated almost all civically appropriate procedures for the development of what would become a major public document (see Wurman and Stotsky, 2010, for details, as well as the model procedures used by the National Mathematics Advisory Panel on which I served from 2006-2008, outlined from p. 79 on in its final report of March 2008).

1. “A solid starting point for adoption of cross state common core standards.”

For the reasons given above, I cannot affirm that Common Core’s final standards are worthy of being our “national” standards.

1. “A sound basis for eventual development of standards-based assessments.”

Based on the analyses cited above, Common Core’s standards are an unsound basis for the development of common assessments. Moreover, in order for test developers to develop “curriculum-based” assessments, they will essentially remove control of curriculum from the local level if not the state level.

Sincerely yours,

Sandra Stotsky

Member, Massachusetts Board of Elementary and Secondary Education

Professor of Education Reform, University of Arkansas

# References

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