Minutes of the Regular Meeting

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

**March 23, 2010**

**8:38 a.m. – 12:55 p.m.**

**Department of Elementary and Secondary Education**

**75 Pleasant Street**

**Malden, MA**

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

**Thomas E. Fortmann**, Lexington

**Beverly Holmes**, Springfield

**Jeff Howard**, Reading

**Ruth Kaplan**, Brookline

**Dana Mohler-Faria**, Bridgewater

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

**Sandra L. Stotsky**, Brookline

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

Chair Maura Banta called the meeting to order at 8:38 a.m.

**Comments from the Chair**

Chair Banta updated the Board on activities over the past month where she represented the Board, including: a visit to the MATCH school with Board member Michael D'Ortenzio Jr.; an invitation by Harvard Graduate School of Education Dean McCartney to attend a talk by USED Secretary Arne Duncan on Race to the Top; a meeting with Bob Schwartz and Chris Gabrielli, who founded a new group called Massachusetts Education Innovation Group; participating in a Rennie Center session on STEM in MetroWest along with Board member Tom Fortmann; and three days in Washington, D.C. for a Wallace Foundation workshop on leadership development and a National Association of State Boards of Education (NASBE) conference.

Chair Banta referred members to a memorandum written by Executive Office of Education General Counsel Nick Martinelli on mandatory participation in ethics training for all state employees.

**Comments from the Commissioner**

Commissioner Chester talked about the previous evening's premiere of “High School Quiz Show” on WGBH. The commissioner said he was in Washington, D.C. this past weekend and met with WGBH President and CEO Jon Abbott and WGBY-Springfield Vice President and General Manager President Rus Peoter at the third annual meeting where the Council of Chief State School Officers (CCSSO) convened chiefs together with local public broadcast affiliates.

Vice Chair Harneen Chernow arrived at 8:45 a.m.

Commissioner Chester said the Department is participating in a number of projects with WGBH, including the merging of their Teacher Domain with the Department's own portal for teachers and a NOVA project to identify exemplary science teachers. The commissioner said the state participated in a 90-minute interview for Race to the Top finalists with a team of external reviewers in Washington last week. The commissioner also reported that he and Secretary Reville met with the state student advisory council and that he attended the CCSSO annual spring conference, which focused on federal education policy.

**Comments from the Chair**

Chair Banta asked Board member Beverly Holmes to provide an update on her participation in a NASBE study group. Ms. Holmes said she is a member of the Structure of Schools study group to examine time and technology. Ms. Holmes said the group will examine what schools should look like in the future and will make recommendations around models for learning and instruction, policy supports and barriers, common core standards and international benchmarks, and the policy climate for continuous improvement. Ms. Holmes said the group is expected to make its recommendations in October. Commissioner Chester said NASBE annually sponsors one or two study groups, and that it is a privilege to have Ms. Holmes serve on this group.

Chair Banta asked Board member Jeff Howard to provide an update on the work of the Proficiency Gap Committee. Dr. Howard said he hopes to have the committee's report for the next Board meeting, and will ask the chair for time on the agenda.

# Approval of the Minutes

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

**VOTED: that the Board of Elementary and Secondary Education approve the minutes of the February 23, 2010 regular meeting as amended.**

The vote was unanimous.

**Common Core Standards**

Chair Banta thanked Board member Sandra Stotsky for her suggestion to invite high school educators and college faculty to address the Board on the Common Core draft standards in English language arts and mathematics. The chair said the Board's special meeting the prior evening featured excellent comments and participation by practitioners. The chair said the draft standards are currently out for public comment, and there is still time to influence changes.

Commissioner Chester said he favors aiming high and looking at the best standards in the world, because political boundaries are less important today to economic opportunity. The commissioner said he supports getting the Common Core right and that a lot of progress has been made. Commissioner Chester said he was pleased to have Susan Pimentel and Jason Zimba, both of whom serve on the Common Core writing teams, in attendance. The commissioner thanked Dr. Stotsky for her participation in the Validation Committee. Commissioner Chester said he was concerned that there is a campaign going on to condemn the standards before they are completed. The commissioner said this is an effort worth contributing to and worth getting right, and that he would not endorse any slippage from the Commonwealth's high standards.

Deputy Commissioner Jeff Nellhaus said the Department has a close working relationship with Susan Pimentel and Jason Zimba, and they have been very responsive to our comments.

*English language arts*

Susan Pimentel, who serves on the Common Core's ELA writing team, thanked the Board for the opportunity to address it. Ms. Pimentel said that since last fall, the team has worked closely with the Massachusetts team, and that Dr. Stotsky has provided comments. Ms. Pimentel said Massachusetts is important because it is a leader and it has great standards.

Ms. Pimentel said she was asked to comment on what she heard at last evening's special meeting. She said the major concern was about content, and that there was not the right balance of content and skills. Ms. Pimentel said she heard the concern around literary terms, elements, and foundational works, and that those may not be clear enough. She said she heard a lot of support for Appendix B. She said Massachusetts has delightful and informative exemplars throughout its framework and the team wants to learn from that. Ms. Pimentel said she heard a call for a definitive list of authors, but that is something the team can't get other states to agree to do.

Ms. Pimentel said the hallmark of the Common Core is a focus on informational text. She said the team heard that foundational skills have to go further than grade 3, which will be addressed in the next round of standards. She said she heard a lot of positive comments on text complexity, but also that it's too complicated and may be a burden on teachers. Ms. Pimentel said she agreed and that the language in Appendix A needed to be cleaned up. She said there was a mix of comments on writing.

Secretary Reville arrived at 9:12 a.m.

Ms. Pimentel said she heard about grammar and conventions, and talk about the control of writing versus correct writing. She said that Board member Holmes had asked whether students are engaged and motivated enough. Ms. Pimentel said we know that students are not reading and writing enough, and that maybe the added examples will enliven their learning. For college and career ready standards, Ms. Pimentel said those haven't been clear enough, and that several standards cannot by themselves define what “college and career ready” means.

Commissioner Chester asked Ms. Pimentel where the team goes from here. She said this is a work in progress, and public comment will be collected until early April. More than 2,000 people have already weighed in. Ms. Pimentel said the team will look across the comments in April and see where to go from there, and that a final draft would be developed in April or May.

*Mathematics*

Mr. Zimba said it is very helpful to hear from practitioners in person. He said there are three writers in math, along with 50-65 experts. Mr. Zimba said that during last night's special meeting, he heard that the team was on the right track in several areas, including: (1) the balance between understanding and doing; (2) a lack of repetition, and bringing things to closure; and (3) number development. Mr. Zimba said that among the areas in which he heard criticism were: (1) identifying priorities at each grade; (2) jargon and language; (3) fluency in math number facts earlier; (4) algebraic thinking, patterns and functions; and (5) a very clear critique of the high school standards.

Mr. Zimba addressed two additional areas, Algebra I in grade 8 and college readiness. Mr. Zimba said it is important to make sure Algebra is "authentic." Mr. Zimba said the intellectual prerequisite for Algebra I has to be in K-7, and that a lot of Algebra I in 8th grade is short of authentic. Mr. Zimba said the standards permit but do not require states to require all students to take Algebra I. Mr. Zimba said the team has worked to make K-7 preparation as solid as possible.

In terms of college readiness, Mr. Zimba said a problem is that there are too many empirical bases for it. One can look at college admission requirements or at high school graduation requirements up through Algebra II. Mr. Zimba said that doesn't suffice, and there is no accepted definition of Algebra II. He said minimally to be college ready a student has to pass Algebra II. Mr. Zimba said we will improve rigor based on what students in the best performing countries are learning He noted that Achieve is doing a comparison with the O-level curriculum in the U.K.

Commissioner Chester thanked the presenters, the educators who spoke at the special meeting, and Department staff who are working on this. Deputy Commissioner Nellhaus said there will be no Board vote until next fall, and the Board would send out the final document for public comment. Dr. Fortmann asked the commissioner to explain what options are available. Commissioner Chester said there are three possibilities: The Board could vote to adopt the Common Core standards verbatim, or the Board could vote to adopt revised Massachusetts standards that are substantially consistent with the Common Core, or the Board could vote to adopt the Common Core standards verbatim with some additional Massachusetts-specific components. The commissioner said it is unclear where the federal government will end up on this as well as the National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO). The commissioner said this is a state-led effort. He said an important question, yet to be answered, is what would the U.S. Department of Education consider to be an appropriate notion of adoption.

Ms. Kaplan asked about the nature of national standards. The commissioner said these are not national standards, they are state-developed common standards. The commissioner said to the extent that the federal government would tie funding to the adoption of Common Core standards, that could blur the distinction between state adopted and federally required.

Dr. Stotsky recommended a pathway 3 for Algebra I at grade 8, with a standard that would be internationally benchmarked. She suggested that students who take trigonometry and pre-calculus would be likelier to be college-ready than students who take Algebra II. Dr. Stotsky said patterns are not the same as pre-algebra; a NAEP validity study two or three years ago that looked at test items for states and NAEP noted a lot of bad pattern items on all tests.

Mr. Zimba said the idea of a third pathway is a good one, and could show calculus as one of the pathways. Mr. Zimba said the concept of college readiness is minimal and focuses on non-selective colleges. He agreed with Dr. Stotsky’s comment about patterns.

Dr. Stotsky said she had a serious problem with the vocabulary standards, and math and science vocabulary must be taught because the contextual approach does not work. Ms. Pimentel said the team hears the critique and will follow up.

Vice Chair Chernow thanked the panels from last night's special meeting for an excellent and informative dialogue. She said she understands that in ELA, people are looking for more descriptive and imaginative, creative thinking. In math, people are looking for a hierarchy of what's important. Vice Chair Chernow asked if the standards are expected to build upon existing textbooks rather than forcing new purchases of textbooks and technology. Mr. Zimba said the focus is on the ends, not the means. He said technology is used to understand math better and enrich the curriculum but it is an opportunity, not a requirement. Mr. Zimba also said the team would go back and evaluate Appendix A.

Commissioner Chester said that Vice Chair Chernow's comment is a major challenge – how to implement higher quality curriculum and instruction in every classroom, and how to get the implementation right. The commissioner said the state's Race to the Top application would provide curricular and technology supports to help teachers deliver high quality curricula.

Secretary Reville said the state is doing the right thing to participate in this process, and that Massachusetts can learn and can improve on its standards. The secretary said it's not clear yet what adoption means, and that a number of things need to be clarified before final judgment can be made. The secretary said the original objective of defining “fewer, clearer, higher standards” is a challenge. Secretary Reville asked how the team approaches the tension in achieving an objective with fewer standards. Ms. Pimentel said in ELA, there are ten general standards with a progression of what it takes to get a student to the college and career ready standard. She said fewer are the college and career ready standards, and clearer are grade by grade specifics. Mr. Zimba said the high school standards need more focus and coherence. Secretary Reville said no one here is looking for a national curriculum, and in the end, it is all about whether we can execute the standards and get all students to achieve them.

Dr. Howard said the focus on college ready is the right focus, and there ought to be a statement that these standards and expectations apply to all students.

Dr. Fortmann said the college ready definition could be problematic because in some instances, college algebra is a remedial course or high school algebra and not college level material. He said he is an advocate of getting states together to agree on common standards without federal intervention. Dr. Fortmann said he applauds this effort. He said the K-7 math standards are really quite good, are well written, and in many ways clearer and make more mathematical sense than our own standards. Dr. Fortmann said those standards just need some adjusting and some more detail. He said the properties of arithmetic need to be emphasized. He said the issue of Algebra in grade 8 needs to be addressed. Dr. Fortmann said the 9-12 math standards are not ready for prime time, but he looks forward to the next draft.

Mr. D'Ortenzio Jr. thanked the presenters, said that Appendix A makes sense, and said he would favor a third pathway. Mr. D'Ortenzio Jr. said he heard one speaker say that Massachusetts standards say "understand and demonstrate," while the Common Core standards mostly say "understand." He endorsed Dr. Howard’s comments. Ms. Kaplan said the standards should be run by students in high school, college, and vocational settings for a reality check. Ms. Kaplan asked how you create standards that don't hold back some students but are not too rigorous for other students. Mr. Zimba said this is a challenge; grade by grade is the right approach, with multiple pathways at later grades, and individual differences could be addressed through different kinds of assessments.

Mr. Chertavian thanked the writers for their work, which he said holds a lot of promise. Mr. Chertavian said that over 75 percent of all jobs will require more than a high school education. Mr. Chertavian said many of us still think of college in the same way we consumed it – 4 years, fixed terms, attending college between ages 18-22. Mr. Chertavian said only 7 out of 100 adults in America today got their degree between 18–22. Mr. Chertavian asked the writers how they thought through career ready, and whether there is content required as well as skills required. Mr. Zimba said that many organizations have work readiness standards that go far beyond any academic content area. Mr. Zimba said those are excellent ideas but the team only focused on academic content dimensions. He also said the team did not create two notions, one for college and the other career. Ms. Pimentel said that logic, reasoning, the ability to mount an argument, and research are all very important. Ms. Pimentel said the ability to collaborate and work together, grammar conventions, emphasis on informational text, and literature are also important to career readiness.

Commissioner Chester thanked the Board for an excellent discussion. The commissioner said he is committed to sticking with this project, and he hopes the common standards will actually add value to the Massachusetts standards.

**Comments from the Secretary**

Secretary Reville said the six Readiness Centers are getting going, and his office has worked with them on developing a program. The secretary said he has begun to reach out to fellow cabinet officers as stipulated by the education reform law, which requires us to connect health and human services with education. Secretary Reville said that Higher Education Commissioner Richard Freeland recently released his Visions Project, which will highlight the work of the public higher education system and a set of indicators of educational and research-related outcomes.

**Public Comment**

* Dr. Emily Dexter, Director of Research for the Center for Reading Recovery and Literacy Collaborative at Lesley University, addressed the Board on the results of a federally-funded study on the positive effects of a teacher coaching model on K-12 literacy achievement.

**Children’s Behavioral Health Task Force and Related Initiatives**

Commissioner Chester said that one of the conditions for school effectiveness relates to healthy schools, and it is timely to provide the Board with an update on the work of the Children's Behavioral Health Task Force. The commissioner said both chambers of the Legislature have passed an anti-bullying bill, and tentatively the plan is to discuss that topic at the April Board meeting.

Associate Commissioner John Bynoe presented an overview of the work of the Task Force, which was established under a 2008 state law,  [*Act Relative to Children’s Mental Health*](http://www.mass.gov/legis/laws/seslaw08/sl080321.htm), and submitted a Behavioral Health and Public School Interim Report to the legislature in December 2009.

Ms. Kaplan asked how participating schools were selected. Associate Commissioner Bynoe said the Department had sent letters to schools, which were self-selected. Associate Commissioner Bynoe said this work is a springboard for the work of the Department’s Center for Student Support, Career & Education Services and provides an important tool for schools to see what systems they have in place and how well aligned those are. Commissioner Chester said this is designed to be a self-assessment tool to get the school community to think about policies and practices for promoting healthy behavior. The commissioner said that Associate Commissioner Bynoe and his staff are engaged with districts and also provide support on an ad hoc basis in crises.

Dr. Howard asked if there were data available on behavioral outcomes, including suspension rates and referrals to the principal's office. Associate Commissioner Bynoe said this was not part of the task force. Commissioner Chester said the Department is charged to do a statewide assessment of the degree to which schools are implementing this framework. Dr. Howard said it would be important to see the results to determine if this initiative has any impact. The commissioner said we can, for example, look at any correlation between suspension rates and academic results. Secretary Reville said the work here is critical to ensure a healthy platform for academic learning. The secretary asked if attendance, tardiness, and dropout rates would be in the tool or report. Associate Commissioner Bynoe said that truancy would be in the final report. The secretary said that truancy should be looked at as a behavior itself.

Ms. Kaplan asked if behavioral health will be a factor with schools identified as Level 4 schools. The commissioner said the instrument will be used in schools at Levels 4 and 5 as well as Level 3, to build capacity for supporting students’ social-emotional well-being.

**Proposed Regulations on Charter Schools, 603 CMR 1.00**

Director of Charter Schools Mary Street presented an overview of the new charter school law, which creates three different kinds of Horace Mann schools as well as other provisions concerning recruitment and retention, proven providers, and backfilling vacant seats. Ms. Street said the proposed regulations address the recruitment and retention plan requirement as well as adding a clarification on the backfilling requirement. Associate Commissioner Jeff Wulfson said another new element was related to the calculation of surplus accumulations. Associate Commissioner Wulfson said that after a public comment period, final adoption of the regulations would take place at the May Board meeting. Associate Commissioner Wulfson said the plan is to reference the regulations in the new application materials the Department sends out this spring and to advise charter schools and districts to prepare to meet these new regulations.

Dr. Stotsky asked about charter schools, such as the Chinese immersion school, where students need to start at the beginning of the sequence, and what happens if students drop out in terms of filling those slots. Associate Commissioner Wulfson said the new law requires charter schools to backfill in the lower half of grades they serve, and if the vacancy occurs after February 15th, the school must hold the spot and backfill it at the beginning of the next school year.

Vice Chair Chernow asked if the role of the Board is the same for all three types of Horace Mann schools, to which the answer was yes. Vice Chair Chernow asked if proven providers have to come from Massachusetts or can they come from anywhere. Associate Commissioner Wulfson said they are not limited to Massachusetts. Vice Chair Chernow asked whether student growth is a factor in the qualifications to achieve proven provider status. She said she would be interested to see something about dropouts, exclusions, and suspensions to evaluate proven providers. She said the lottery process on page 11 could be clearer. Vice Chair Chernow asked if we could add something to say we encourage or expect strong retention. Associate Commissioner Wulfson said the Department will take note of all the suggestions on language for the final regulations. He said the language on surplus, by statute, refers only to tuition revenues.

Ms. Kaplan asked about recruitment and student interviews. Ms. Street said interviews and placement tests may not be used to restrict admissions. Associate Commissioner Wulfson said some schools have post-acceptance placement tests. Ms. Street said the retention and recruitment plan must be approved, and the Department plans to issue more detailed guidance.

Dr. Fortmann expressed concern about the language on page 7, paragraph (f), around private and parochial schools not being eligible to become charters. Dr. Fortmann said the new language and use of the word "become" is stronger than what the statute says. The commissioner said this is a tricky issue and that the Department would be open to suggestions.

Dr. Stotsky said a lot of this should be up to administrative judgment. She suggested requiring each charter school to provide the Department by November of each year with the results of an intake survey on why parents chose to enroll their children in the charter school and exit surveys on why parents took their children out of the school. Associate Commissioner Wulfson said this would be useful information, but asked whether this is something that needs to be constant, or a one-time research study. Commissioner Chester said before putting such a requirement into the regulations, the Department should first look for existing data. The commissioner said he did not see this as appropriate for the regulations.

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

MOVED: that each charter school provide the Department of Elementary and Secondary Education by November of each year the results of intake surveys on why parents choose to enroll and exit surveys on why they took their children out of the school.

The motion failed 1-10. Dr. Stotsky voted in support of the motion.

Ms. Holmes asked about non-profit businesses. Associate Commissioner Wulfson said the language mirrors the statute, and that if a business is for-profit, it may not be part of the applicant group. Ms. Holmes asked how to ensure that parents act as partners. Ms. Street said that charter applicants will have to describe outreach efforts.

Secretary Reville said that on the private-parochial matter, there is a need for clear, transparent procedures. The secretary said that on page 10, there should be more detail on what the recruitment and retention plans intend to include. Ms. Street said the statutory language includes a lot of detail, and we can provide additional guidance. Dr. Fortmann moved that the 1st sentence of paragraph (f) on page 7 be replaced with the exact sentence in statute. Commissioner Chester said he did not have a problem with that substitution.

On a motion duly made and seconded, it was:

VOTED: that the first sentence of paragraph (f) on page 7 of the draft regulations be replaced with the exact sentence in statute.

The vote was 10-1. Vice Chair Chernow voted in opposition.

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

**VOTED: that the Board of Elementary and Secondary Education, in accordance with G.L. c. 69, § 1B, 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 amendments to the Regulations on Charter Schools, 603 CMR 1.00, as presented by the Commissioner. The proposed amendments implement the changes to the charter school statute, M.G.L. c. 71, §89, as amended by chapter 12 of the acts of 2010.**

The vote was unanimous.

**School and District Accountability and Assistance: Proposed Regulation on Placement of Schools in Level 4, 603 CMR 2.03(3)**

Commissioner Chester said the Department received three comments on the proposed regulations on the placement of schools in Level 4. The commissioner said he would bring the full set of regulations around interventions to the Board in April.

Dr. Mohler-Faria had to leave the meeting at 12:47 p.m.

Deputy Commissioner Karla Baehr said there was a change made in the drafting of the legislation relative to improvement in student academic performance meaning growth model, and a directive to use growth as one of two criteria. Deputy Commissioner Baehr said this can be made clear in the guidance document. Mr. D'Ortenzio Jr. asked whether the regulations are under the purview of the Board, and if the Board could make additional changes. General Counsel Rhoda Schneider said yes, the Board could make changes, but if they were significant changes, the regulations would once again have to be sent out for public comment.

Vice Chair Chernow asked about the notification issue related to Chair Walz's comment, and when that would happen. Deputy Commissioner Baehr said it would be once per year and that she anticipates an annual notification. The vice chair also asked about the difference between dismissal, suspension, and exclusion. Deputy Commissioner Baehr said exclusion occurs when a student is excluded from all school activities for 45 days or more, where a dismissal sends a student home for the balance of the day. Secretary Reville said that for the charter school data, it appeared that what were dismissals for behavioral reasons were getting counted as suspensions.

On a motion duly made and seconded, it was:

**VOTED: that the Board of Elementary and Secondary Education, in accordance with G.L. c. 69, §§ 1B and 1J, as amended by Chapter 12 of the Acts of 2010, and having solicited and reviewed public comment in accordance with the Administrative Procedure Act, G.L. c.30A, § 3, hereby amend the Regulations on Underperforming Schools and School Districts, 603 CMR 2.00, as presented by the Commissioner. The regulation relates to placement of schools in Level 4 (underperforming). It replaces the current regulation 603 CMR 2.03(3).**

The vote was unanimous.

Deputy Commissioner Baehr said these changes do not affect the list of 35 likely Level 4 schools, so that list will become the 35 schools. She said districts will move forward to initiate local stakeholder groups, look at their data, and engage in redesign work that will result in a turnaround plan that the commissioner will authorize. Secretary Reville asked if there was any demographic analysis. Deputy Commissioner Baehr said that the 35 schools represent 17,000 students, and if that were a district itself, it would be the fourth largest school district in the Commonwealth. Eighty-seven (87) percent of students in those 35 schools are eligible for free or reduced-price lunch, close to one in four students are students with disabilities, and close to one in five are English language learners. Secretary Reville said the correlation is tight between poverty and achievement gaps.

**Next Meeting**

The next regular meeting of the Board of Elementary and Secondary Education is scheduled for Tuesday, April 27, 2010 at Nashoba Valley Technical High School in Westford.

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

**VOTED: that the Board of Elementary and Secondary Education adjourn the meeting at 12:55 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

Minutes of the Special Meeting

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

**March 22, 2010**

**3:05 p.m. – 6:15 p.m.**

**Massachusetts Department of Elementary and Secondary Education**

**75 Pleasant Street**

**Malden, MA**

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

**Thomas E. Fortmann**, Lexington

**Beverly Holmes**, Springfield

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

**Sandra L. Stotsky**, Brookline

Members of the Board of Elementary and Secondary Education Absent:

**Jeff Howard**, Reading

**Ruth Kaplan**, Brookline

**Dana Mohler-Faria**, Bridgewater

Also Absent:

**Mitchell D. Chester**, Commissioner of Elementary and Secondary Education, Secretary to the Board (Deputy Commissioner Jeff Nellhaus present in his place)

Chair Maura Banta said the Board decided to hold this special meeting to hear directly from educators on the draft Common Core standards. Chair Banta recognized Deputy Commissioner Jeff Nellhaus. Deputy Commissioner Nellhaus said that Commissioner Chester had asked him to convene this meeting today. The deputy commissioner said the Common Core is a state-led effort being led by the Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA).

*English Language Arts*

The Department's Director of Humanities, Susan Wheltle, provided an overview of the draft English Language Arts (ELA) framework. Deputy Commissioner Nellhaus then asked panelists to introduce themselves and provide their overall impressions of the draft document as well as their feedback on strengths and areas for improvement. The ELA panelists were:

* Alexander Dan, Chair, English Department, Mystic Valley Regional Charter School
* Lori DiGrasi, Middle School Reading Teacher, Framingham Public Schools
* Elise Frangos, English Content Director, Mass Math & Science Initiative of Mass Insight Education
* Lorretta Holloway, Associate Professor, English Department, Framingham State College
* Greg Hurray, Principal, Horace Mann School, Newton Public Schools
* Joseph McCleary, Superintendent/Director, Mystic Valley Regional Charter School
* Barbara McLaughlin, Senior Program Director, K-5 English Language Arts, Boston Public Schools
* Thomas O'Toole, English Language Arts Director, Grades 6-12, Waltham Public Schools
* Bruce Penniman, English Department Adjunct Professor, UMass Amherst (written comment only)
* George Viglirolo, Former High School ELA Teacher, Brookline Public Schools (written comment only)

Mr. McCleary said the draft Common Core standards do not have the same level of coherence as Massachusetts standards. He said the state's ELA frameworks are more effectively organized and provide a more detailed list in terms of content. Mr. McCleary said there could be more input from people with direct study of literature. He said he sees very serious drawbacks in the current draft.

Mr. O'Toole said that the overlapping grades and grade spans are very helpful in the draft documents. He said he needs to see definitive texts in Appendix B, and especially writers from earlier centuries. Mr. O'Toole said that in Appendix C, the grade 8 expository was a better sample than grade 10. Mr. O'Toole said that in Massachusetts, by simply naming the parts of speech, the emphasis gets placed on correctness rather than control. He said there should have been a lesson in control. He said rather than naming things, there should be direction to deep grammatical structure at the sentence level. Mr. O'Toole said there should be a focus on writing with more power.

Ms. DiGisi said she appreciated the progression of standards and vertical and horizontal descriptions of standards. She said collaboration and comprehension are important discussion points. Ms. DiGisi said she liked including history and science. She said there are inexperienced writers and readers, and not all come to the middle school at a grade 6 level. She said those students need simpler text to practice.

Mr. Hurray said the standards are moving in the right direction. He said the foundations of reading section needs to be expanded, and is concerned that this document stops at K-3. He said he was concerned that writing places such an emphasis on persuasive writing, and he was looking for more descriptive and imaginative writing. Mr. Hurray said he had trouble with the artiface of the format, he did not find the range and complexity of texts to be helpful, and he was disappointed in the lack of emphasis on creative and critical thinking.

Mr. Dan said he applauded the emphasis on research, and that the college and career ready standards, although clear and concisely written, seem to lead to vague standards in ELA. Mr. Dan said the Common Core doesn't seem to define the roles of vocabulary as explicitly as the Massachusetts standards. He said that Appendix C is a valuable resource for teachers, and the annotations are clearly helpful.

Ms. Frangos said the Common Core draft standards are comprehensive and the writers deserve praise. She said she was pleased to see the mention of certain terms – construct arguments, integrate, qualify, shifts, incorporation of visuals. She said there is a need to say that syntax is important. Ms. Frangos said that in history, it is important to launch an argument, but also to give time to the counter-argument. She said the integration of media should be done with care, and there needs to be mention of how to cite one's electronic sources properly.

Ms. Holloway said the document is lucid and pleasant to read. She said she appreciated the section on the special place of argument, and liked the acknowledgement of the need to understand discipline specific writing. Ms. Holloway said she was concerned there was not enough professional development across the levels. She said the idea of independent reading is important.

Ms. McLaughlin liked the organization, and said it was easy to see across K-5 what is needed. She said the incorporation of 21st century skills makes sense. Ms. McLaughlin said the appendices are helpful but she would like to see core texts. She liked that the standards are grade specific, liked the standards for history and science, and liked the mention of English language learners and students with disabilities, and would like to see more of that. Ms. McLaughlin said she found the reading standards to be stronger, and that the writing standards were unclear. She said pre-K standards would be useful.

Chair Banta said two individuals, Bruce Penniman and George Viglirolo, were not able to attend but would provide written comments. Ms. Wheltle said that a major issue for Mr. Penniman was that he was glad to see there is room for narrative and description at high school.

Mr. Chertavian said there seemed to be some consistency around content versus skills, and that there were a lot of good suggestions. Mr. Chertavian asked if compared to any public opinion or recent media, whether any of the panelists felt the draft standards would represent a real backsliding for Massachusetts. Mr. McCleary said the draft standards have a fatal lack of coherence, and that the standards have a lot of "how" but not as much "what." Ms. Holloway said the real issue is whether students are attaining these standards. Mr. Dan said the draft standards would be a regression from what Massachusetts has, that in his opinion there is not a balance between content and skills, and that more content is needed.

Ms. Holmes asked if the draft standards go far enough to promote student motivation and engagement. Mr. McCleary said that it is specific content that provides the possibility for harnessing the love of learning. Ms. Frangos said it would be helpful to have a list of what reading strategies teachers could use. Ms. McLaughlin said these standards expect students to read, write, and talk and will motive them.

Vice Chair Chernow asked what buzz the panelists were hearing about the Common Core standards. Ms. Holloway said education majors are wondering when this will be adopted, and what about professional development. Mr. Hurray said teachers and curriculum planners are concerned how to translate these to classroom practices. Mr. Dan said teachers are concerned on behalf of students, but there is not trepidation for teachers. Ms. Frangos wondered whether the standards recognize cultural history. Ms. DiGisi said teachers are eager and excited, and appreciate the range of literature in this document. Mr. McCleary said the work of Nancy Atwell brings people into reading through their own interests.

Chair Banta said she has heard on a number of occasions how helpful Massachusetts has been to this process. She thanked the panelists for their time and expertise.

*Mathematics*

Director of Math, Science, Technology, Engineering Barbara Libby provided an overview of the draft mathematics standards. The mathematics panelists were:

* Anne Marie Belanger, Mathematics High School Teacher, Greater New Bedford Regional Vocational Technical High School
* Richard Bisk, Chair, Mathematics Department, Worcester State College
* Kathleen Bodie, Interim Superintendent, Arlington Public Schools
* Octavia Brauner, High School Mathematics Teacher, Arlington Public Schools
* Charlotte Carlisle, Mathematics Content Director, Mass Mathematics & Science Initiative of Mass Insight Education
* Anne Marie Condike, K-5 Mathematics Coordinator, Westford Public Schools
* Carol Hay, Chair, Mathematics Department, Middlesex Community College
* Diane Kelly, K-12 Director of Mathematics; 9-12 Director of Science and Technology/Engineering, Revere Public Schools
* Joanna Krainski, Middle School Mathematics Coordinator & Teacher, Tewksbury Public Schools
* Peter Mili, High School Mathematics Teacher, Cambridge Rindge and Latin
* Kimberly Steadman, Elementary Principal, Edward Brooke Charter School

Ms. Carlisle said she appreciated the effort and specificity, and found the standards to be more conceptual and less formulaic. She said implementation could be overwhelming for new teachers. Ms. Carlisle said there is no hierarchy of criteria, and this is not a good framework if you need to make decisions. She said there is no emphasis on which standards are critical, there is a question about technology funding, and there is no mention of how a student gets to take advanced coursework.

Ms. Belanger said the framework is daunting to look at, and there is no clear view without the appendix and pathways. She said this will determine how math textbooks are written. She noted that her district just bought an entire set of textbooks. Ms. Belanger said age appropriate math vocabulary is missing. She commended the focus on function and modeling.

Mr. Mili said he looked mostly at the high school standards, and liked what was in the new document. He said there should be a better balance between understanding and doing. Mr. Mili said the way the standards are listed, they are not differentiated, and they list understanding standards before skill standards. He said he favors the attempt at differentiation, and liked using technology to understand mathematics implementation. Mr. Mili expressed concern about resources for implementation, and suggested looking at how to use what we have. He said this might also be a good time to look at assessment and ask whether the MCAS standard is high enough.

Ms. Steadman said she was slightly concerned about the rigor overall. She said within Number Sense, place value and the focus on properties were strong. Ms. Steadman said she was concerned that there was not much attention to estimation or rounding until 4th grade, and percentiles not until 5th grade. She said her greatest concern was there was no algebraic thinking up through the 5th grade. Ms. Steadman said math facts need more emphasis with more rigor. She said that probability and central tendency were not in any elementary grades, and that geometry was not as rigorous as in the Massachusetts framework. Ms. Steadman said she appreciated the focus on line graphs, but that no other graphs were introduced, such as circle graphs.

Ms. Condike said she was pleased with the overall format, and that the document was well written. She said the layout and the descriptors are clear. Ms. Condike said there is a strong emphasis on number development at the K-5 level, which is where it should be. She liked the emphasis on precision, the use of structure, and the fluency verbiage around math facts and algorithms. Ms. Condike said there was a solid balance between fluency and understanding of concepts, and she was pleased to see properties well explained in a way that is easy and clear for elementary teachers. Ms. Condike said she would like to see algebraic reasoning at lower grades. She said she is pleased how much more conceptual the document is, but that rounding and estimation are not there. Ms. Condike said the most important issue for her is how accessible the document is for elementary teachers.

Ms. Hay said she was overwhelmed with the number of high school standards, and that Singapore's standards are much better organized. She applauded the use of spreadsheets but is concerned that they take up time. Ms. Hay said she is not sure the standards address a more focused curriculum, and that these changes would require professional development. Ms. Hay said the Massachusetts standards align well to what is in the Common Core standards, but the language in Massachusetts's document is stronger.

Ms. Brauner said the 9-12 standards are very detailed, but there are two to three times as many standards as we currently have and many schools will find this challenging. Ms. Brauner said she liked the STEM standards but they will be challenging to incorporate into the classroom. She said there are implementation questions around textbooks, technology, and teacher support.

Ms. Bodie said she sees strengths and weaknesses in the draft standards. She said in general, the Massachusetts standards are more concise and easier to follow than this draft document. She spoke about the elementary standards, and students' inability to work well with fractions. Ms. Bodie said the writers were clearer in the elementary standards than the middle and high school levels. She said it is not clear what students should know by the end of 10th grade.

Ms. Kelly said common standards are a great idea. She found the K-8 document cohesive, readable, and well organized. Ms. Kelly said she liked the expectation of mastery at every grade level. She expressed concern that some standards have a STEM designation while others do not.

Ms. Krainski said the strength of the Common Core is the general descriptions at each grade level. She said the document is cohesive, focused, and builds on important mathematical content and connections. She said she was concerned that actual classroom practices are not there, and was concerned also with 8th graders and their pathways. Ms. Krainski said terminology was a strength but it must be uniform. She suggested including a parent section to address study skills and parent training, and a section on gifted and talented students. Ms. Krainski said training and staff development need to be considered.

Dr. Bisk said this is a very important initiative and the standards are well written. He said he likes the "understand, solve, calculate, apply" language, and the emphasis on modeling and applications. Dr. Bisk said it would be helpful to state what is needed for college readiness as opposed to job readiness. He said he likes the Common Core's emphasis on place value. Dr. Bisk said it would be helpful to provide an overview as to when a concept is introduced and when it should be mastered. He said his biggest concern was computational fluency, and that multiplication was not mentioned until 3rd grade, when it should be 1st grade. Dr. Bisk said the K-6 core standards are pretty good, but that computational fluency, including fluency with whole numbers and fractions, needs strengthening and should be placed at the same grade levels as in Massachusetts.

Dr. Stotsky asked whether a third pathway could be created showing an authentic Algebra I class at grade 8 and then allowing four years of high school for advanced courses. Dr. Stotsky said there should be a recognition that there are faster and slower learners, and there needs to be an adjustment for that by 8th grade. Dr. Stotsky also asked about the college readiness line in the Appendix for mathematics.

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

**VOTED: that the Board of Elementary and Secondary Education adjourn the meeting at 6:15 p.m., subject to the call of the chair.**

The vote was unanimous.

Respectfully submitted,

Jeffrey Nellhaus

Deputy Commissioner of Elementary and Secondary Education

**Addendum to the Minutes**

To: Maura Banta, Chair, and Mitchell Chester, Commissioner of Education

From: Sandra Stotsky, Member, Board of Elementary and Secondary Education

Date: March 23, 2010

About: A Critique of Common Core’s March 2010 Draft of English Language Arts Standards

**I. Purpose**

Many Americans support the idea of common, or national, standards in order to ensure that all students, no matter where they live and what school they attend, are taught a body of common national and world knowledge and acquire a mature understanding and use of the English language. There are many reasons why a set of national standards would be especially valuable for the English language arts, the central subject in the school curriculum. I have consistently supported the goal of national standards for the English language arts *but only if these standards are at least as good as, if not better than, those in Massachusetts.*

The purpose of this critique is to suggest major areas needing improvement in the public comment drafts for ELA that the Council of Chief State School Officers and the National Governors Association jointly released in March 2010. If the "college- and career-readiness" standards and the grade-level standards they propose for ELA are to make all this nation's K-12 students college-ready readers by grade 12, considerably more work is needed on these drafts to make them at least as good as the current ELA standards in Massachusetts and those in its November 2009 draft. Fortunately, there is time for this work to be done. It is in that spirit that I offer this critique and begin with a detailed analysis of the serious deficiencies in the March draft. The many recommendations in the final section of this document are designed with this constructive goal in mind—to make our national standards at least as good as those in the state that not only has been judged to have the best standards in the English language arts but also has indirect empirical evidence that they are. The release by NAEP on Wednesday March 24, 2010, showing that the Bay State continues to lead the country on the grade 4 and grade 8 assessments in reading is further confirmation.

**II. Major Issues in Common Core’s March 2010 Draft of English Language Arts Standards**

***1. Use of ten culture-free and content-empty College- and Career-Readiness Standards for Reading (henceforth CCRS, listed on p. 6 and p. 31 of the March draft) that are incapable of serving as the definition of college readiness in reading and as the framework for generating grade-level academic literature and reading standards***

We are told that the grade-level literature and reading standards "define what students should understand and be able to do in each grade and build toward the ten College and Career Readiness Standards." But why grade-level literature and reading standards should build toward ten content-empty and culture-free skills purporting to define college readiness is not clear, not only because no body of empirical evidence or international benchmarks to justify them has been (or can be) offered, but also because they seem to have an intellectually negative effect on the grade-level standards they directly spawn. Moreover, and this is the most worrisome aspect of these ten “standards,” despite the lack of supporting research evidence or international benchmarking, the U.S. Department of Education explicitly wants these CCRS, not grade-level standards, used as the basis for the common high school exit tests now being developed.

What is the likely source for having generic, content-empty and culture-free skills as the intellectual goal of grade-level standards in the English language arts and as the basis for grade 10 common tests (possibly leading to a "grade 10 diploma")? One major source seems to be the skills-oriented standards in David Conley's report *Understanding University Success* (2003), which proposed the notion of "college readiness standards" and presented them for each major subject in the arts and sciences. Yet, the complete list of English standards in his report provide counter-evidence to the use of an exclusive list of culture-free and content-empty skills as the definition of college readiness in English or reading. After three skills-oriented standards, the fourth standard in Conley's list of English standards, generated from a survey of college English faculty, is standard D, presented below.

"*D. Successful students are familiar with a range of world literature.* They:

D.1. demonstrate familiarity with major literary periods of English and American literature and their characteristic forms, subjects and authors.

D.2. demonstrate familiarity with authors from literary traditions beyond the English-speaking world.

D.3. demonstrate familiarity with major works of literature produced by American and British authors."

The overarching importance of this standard can be seen in the Appendix, the testimony on Common Core’s March draft provided to the New Jersey Board of Education on March 17, 2010, by Susan Wolfson, an English professor at Princeton University. Yet, D is not included as a Common Core college- and career-readiness standard, and its subsidiary objectives do not appear in its grade level standards.

To understand the crippling limitations of these ten content-empty and culture-free "readiness" skills for generating academic grade-level literature and reading standards, we need to look at exactly what they have spawned as grade-level standards and their intellectual progressions from grades 6 to 12. Do these CCRS lead to academically substantive standards that enable teachers to see exactly how intellectual demands increase from grade to grade? Do they provide a clear guide on curriculum content to teachers? Here are the first two of the ten standards for Literature and Reading in each grade from grades 6 to 12. The introduction claims they "offer a focus for instruction each year and help ensure that students gain adequate exposure to a range of texts and tasks…"

For Literature:

Grade 6: 1. Cite specific textual evidence to support analysis of what the text says explicitly as well as inferences drawn from the text.

Grade 7: 1. Cite several sources of textual evidence when useful to support analysis of what the text says explicitly as well as inferences drawn from the text.

Grade 8: 1. Cite a wide range of evidence throughout the text when useful to support analysis of what the text says explicitly as well as inferences drawn from the text.

Grades 9 and 10: 1. Cite the evidence in the text that most strongly supports a specific analysis of what the text

says explicitly as well as inferences drawn from the text.

Grades 11 and 12: 1. Cite strong and thorough textual evidence to support analysis of what the text says explicitly

as well as inferences drawn from the text, including determining where the text leaves things uncertain.

For Reading:

Grade 6: 1. Cite specific textual evidence to support analysis of what the text says explicitly as well as inferences drawn from the text.

Grade 7: 1. Cite several sources of textual evidence when useful to support analysis of what the text says explicitly as well as inferences drawn from the text.

Grade 8: 1. Cite a wide range of evidence throughout the text when useful to support analysis of what the text says explicitly as well as inferences drawn from the text.

Grades 9 and 10: 1. Cite evidence in the text that most strongly supports a specific analysis of what the text says explicitly as well as inferences drawn from the text.

Grades 11 and 12: 1. Cite strong and thorough textual evidence to support analysis of what the text says explicitly as well as inferences drawn from the text, including determining where the text leaves things uncertain.

Except for the final clause in grades 11-12, these standards are all (poorly written) paraphrases of the *first* CCRS for Reading ("Read closely to determine what the text says explicitly and to make logical inferences from it; cite specific textual evidence when writing or speaking to support conclusions drawn from the text"). They show no increase in intellectual demand at all. Nor do they show any differences between a literary and a non-literary text. How can they? They are generic skills--"can do" kinds of statements--which can be applied at any grade level to any text but in themselves entail no body of literary or world knowledge to give them intellectual heft. What would give them power would be a sequence of specific texts through the grades that show increasingly difficult or complex ideational content and other features specific to non-literary texts, or increasingly complex themes and features specific to literary texts. Moreover, these texts would have to have categorical, formal, and substantive connections to what had previously been read and to what will be read at a later date to provide the basis for an authentic curriculum or course of studies. But the guideline to such texts (i.e., to a curriculum) clearly does not (and cannot) come from a content-empty and culture-free skill.

Here is #2 in the Standards for Literature and Reading 6-12, lest readers think this particular criticism is based on the selection of the only bad apple in the barrel.

For Literature:

Grade 6: 2. Analyze how a theme or central idea develops over the course of a text, drawing on key details.

Grade 7: 2. Analyze how two or more themes or central ideas in a text relate to one another, drawing on key details.

Grade 8: 2. Analyze how recurring images or events contribute to the development of a theme or central idea in a text.

Grades 9 and 10: 2. Analyze in detail the development and refinement of a theme or central idea in a text, including how it emerges and how it is shaped and refined by specific details.

Grades 11 and 12: 2. Analyze how multiple themes or central ideas in a text interact, build on, and, in some cases, conflict with one another.

For Reading:

Grade 6: 2. Analyze how a central idea develops over the course of a text, drawing on key details.

Grade 7: 2. Analyze how two or more central ideas in a text relate to one another, drawing on key details.

Grade 8: 2. Provide an objective summary of a text, accurately conveying an author’s view and specific points.

Grades 9 and 10: 2. Analyze in detail the development and refinement of a central idea in a text, including how

it emerges and is shaped and refined by specific details.

Grades 11 and 12: 2. Analyze how multiple ideas in a text interact, build on, and, in some cases, conflict with one another.

Again, with just a few exceptions on details, almost all of these standards are paraphrases of the *second* CCRS for Reading ("Determine central ideas or themes of a text and analyze their development; summarize the key supporting details and ideas"). They, too, show almost no increase in intellectual demand through the grades. And except for the statements at grade 8 and the use of "theme" in the Literature standards, they show no real difference between literary and non-literary texts. Nor is their meaning very clear: e.g., how would sixth graders respond to a request to analyze how a theme "develops over the course of a text"? Teachers need an example showing exactly what each generic statement means when applied to a specific text at a specific grade level. (One wonders if these generic statements were written by experienced high school English teachers.) The point is that it is not possible for a culture-free and content-empty skill set to generate authentic academic standards across the grades. A content-empty and culture-free skill set cannot serve as a curriculum framework.

A tacit admission that the CCRS are incapable of generating a substantive curriculum framework is the placement of a sidebar on p. 31, the page where the CCRS are listed, on the importance of reading such high-quality texts as "the founding U.S. documents, the classics of American literature, and the timeless dramas of Shakespeare" and gaining a "reservoir of literary and cultural knowledge." If reading such texts was that important, why wasn't the content of the sidebar incorporated into the CCRS? Nor are there any links between the CCRS and the list of "illustrative" titles (a very fine list) in Appendix B. This Appendix simply indicates a range of complexity across grade levels and major genres. In no way does it suggest to teachers how these works could be used to address the CCRS in the classroom, that is, how they are related to any of the CCRS and, more important, to each other for the purpose of crafting a classroom or school curriculum. *Although many media commentators on this draft seem to have misunderstood this list of titles in Appendix B, not one of these works is required reading at any grade.* By putting most of the little content that is mentioned (see Section 6 below) into peripheral machinery (i.e., a sidebar and an appendix), Common Core clearly implies the inadequacy of its CCRS--and that their inadequacy was intended.

Because of a seeming unwillingness to provide the substantive contours for a coherent and progressively more challenging literature curriculum in the secondary grades, Common Core has had to resort to an artificial mechanical device to link literary and non-literary texts to the standards generated by this content-empty and culture-free skill set. The device is a complexity formula, and the huge list of titles in Appendix B is presented as simply "illustrative" of different levels of complexity. The central problem for an English curriculum remains, however. A complexity formula cannot indicate (1) what makes a text the richest literary or non-literary text to study at a particular grade level or at a particular time in the school year, (2) a text's relationship to other literary and non-literary texts, historical or contemporary, or (3) how to understand a text's historical or cultural significance (i.e., the issues in developing a coherent curriculum). Moreover, there is nothing in Common Core’s descriptive or explanatory material to indicate that the grade-level standards or the illustrative titles provided in Appendix B will serve as the basis for common assessments. So far as we know, the basis for the common assessments will be the CCRS--the content-empty and culture-free skill set governing the grade-level ELA standards. What is not at all clear is why this formula was developed and who will use it, given its many limitations.

***2. Emphasis on a useless "complexity" formula for English teachers to use to determine the complexity of the literature they teach***

To guide teachers in the choice of texts for the classroom curriculum, Common Core provides a new readability formula. However, the formula developed by a University of Memphis group for Common Core ("Coh-Metrix" or CM) is unusable by the average teacher, and it is unlikely to be used by the able teacher for several reasons.

First, CM provides no easy-to-understand grade-level placement as its "score," a major virtue of the Dale-Chall Readability Formula and others. CM has been constructed to show differences between easy and hard texts on five "key factors." So far, it provides teachers only with percentile numbers on these factors ranging from 0% to 100%. However, these factors do not have consistent meanings. Texts high in "narrativity" and "cohesion" will have low percentiles, meaning they are easy. Texts low in "syntax" and "word abstractness," meaning they are easy, will also have low percentiles. The chart in Appendix A on p. 10 eventually makes sense but not at first blush because the formula developers did not use category names with parallel neutral values.

Second, CM is not a substitute for a properly trained English teacher's judgment. In one of several applications of CM in Appendix A to show its supposed usefulness, readers are given the percentiles for its five factors for an excerpt from *The Grapes of Wrath*. We are also given the results of applying two well-known formulas (Flesch-Kincaid and Lexile) to the excerpt, both of which place it at grades 2-3 in reading level. After describing the excerpt as "extremely easy" on the basis of most quantitative measures, Common Core correctly notes that "qualitative measures" (i.e., professional judgment) place it appropriately at grades 9-10. Clearly, that is all that was needed to begin with.

Third, CM's percentiles are not necessarily readily interpretable. It is not at all clear what differences in the percentiles for these five key factors actually tell us. To show its usefulness for Steinbeck's novel, Common Core claims that its recommended grade-level placement at grades 9-10 is reflected in the high percentiles on "sentence-level cohesion" and "overall text cohesion," which it believes results from the "fact that Steinbeck makes relatively few explicit links among words, sentences, and ideas--something that will likely pose a challenge to student readers." However, no evidence is presented showing that a paucity of explicit textual links in this novel or in others Steinbeck has written actually poses a challenge to high school students. In fact, a reading of the excerpt, which consists chiefly of dialogue, suggests what the text-level difficulty, if any, may be--the characters' spoken dialect, which Steinbeck captured orthographically. This frequent feature of a novel--the spoken dialect used by its characters--which *can* pose a reading challenge (as any English teacher can tell us with respect to Zora Neale Thurston's *Their Eyes Are Watching God*), does not appear to be captured by any of the five factors in C-M.

No "complexity" formula can tell an English teacher a text's literary context and literary history--what links it to earlier and contemporary texts. The nation's English teachers do not need a "complexity" formula to judge the complexity of a literary text. Its very presence implies a negative view of their competence.

It has always been clear to educators, parents, and others in any country that a progressively more challenging curriculum should include texts of greater and greater difficulty and complexity. Common Core's explanation (in Appendix A) of why complexity matters and why the school curriculum has failed our students on this issue diagnose the problem correctly; textbooks have been continuously dumbed down for decades. But the solution is not to expect English teachers to use a complexity formula to help them judge what texts to teach at each grade level. They know how (or should know how) to determine complexity better than any mechanical formula can. If they can't, we need to find out more about their academic and professional education.

The problem of dumbed-down textbooks lies to a great extent with the advice educators gave teachers and publishers many years ago to address teachers' inability to teach struggling students how to read grade-level materials. The fault does not lie with the publishers themselves. They were asked to reduce the reading level of their textbooks and to narrativize what had been expository texts on the grounds that narratives were easier to read (true), would engage struggling readers better (possibly), and would teach them what they couldn't learn from expository texts (not true). After publishers and teachers followed their advice and regularly lowered the reading level of their textbooks, struggling readers still didn't read better. Worse yet, all the other students were also learning less. Now educators have disingenuously concluded that students can't read complex texts by grade 12 because their textbooks declined in complexity.

What remains unsolved--the original problem in the 1950s and 1960s--is how to help students who don't like to read or who haven't learned how to read very quickly to read "complex" texts. Nothing in these standards addresses the basic issue. We have simply moved in a full circle back to where we were in the 1950s and 1960s when readability formulas were openly used to gauge the level of what should be in school textbooks--and their use regularly denounced by advocates of "authentic" literary texts for elementary schoolchildren. The curriculum issues also remain unsolved: a formula can't tell a poorly educated teacher the literary context and literary history of a text, as well as the common world knowledge embedded in it, to help students make the right links to what will help them understand it.

***3. Pedagogically useless vocabulary standards in grades 6-12***

Given that vocabulary and concept knowledge is the critical component in reading comprehension, the deficiencies in this "strand" have the most serious implications. The "standards" presented in the most crucial years (grades 6-12) imply only a contextual approach to vocabulary learning even though the research is clear about the benefits of some explicit vocabulary teaching. The pedagogical uselessness of what the March draft offers in this strand is a recipe for reading failure at the high school level, especially for students whose families are not highly literate in English. A major strength of all the versions of the Massachusetts English language arts curriculum framework is the spelling out of the different categories of words/concepts that teachers could explicitly teach through the grades, especially in high school (but not how to teach them). Even the use of dialect by a literary writer is an explicit standard to be taught in a strand on formal/informal English, which doesn't exist in Common Core's March draft.

Here is all that the empty College and Career Readiness Standards provide on p. 47:

"Determine the meaning of words and phrases encountered through conversations, reading, and media use."

"Understand the nuances of and relationships among words."

"Use grade-appropriate general academic vocabulary and domain-specific words and phrases purposefully acquired as well as gained through conversation and reading and responding to texts."

There is not even a CCRS requiring the teaching and learning of dictionary skills (and there are many that need to be taught and learned, as spelled out in the Bay State's own 2001 ELA curriculum framework for ELA). All we find on pp. 49 and 50, where "vocabulary acquisition and use" has been relegated and smothered by an anti-teaching approach is "verify the preliminary determination of a word's meaning (e.g., by checking the inferred meaning in context or looking up the word in a dictionary)."

Among other pedagogically useless standards are:

"Trace the network of uses and meanings that different words have and the interrelationships among those meanings and uses." (One wonders how many teachers can interpret this "standard" at all, never mind translate it into meaningful pedagogy.)

"Distinguish a word from other words with similar denotations but different connotations." It is not surprising that no examples were given to illuminate the meaning of this "standard" since it is pretentious gibberish.

We do not know if these vocabulary "standards" were actually approved by the vocabulary experts listed by Common Core as reviewers or consultants. If they were, some hard questions need to be asked. Shouldn't we expect American students to learn, for example, the meaning of foreign words used frequently in written English, idioms, literary allusions, proverbs, and adages, among other categories of words that need to be brought explicitly to students' attention? Or, is the expectation to be: if you don't know what a word means, guess or look it up, if you can figure out how to do that. There isn't even a hint that discipline-specific technical vocabulary should be looked up in a glossary because the meaning of technical terms (especially in science and mathematics) usually cannot and should not be determined contextually. The low quality of these vocabulary standards raises questions about the editorial functions provided by Common Core.

***4. Unnecessary and therefore misleading reference to NAEP's percentages for passage distribution on reading assessments***

The introduction to the K-12 standards seems to want to justify a stress on reading "informational texts" by referring to the "Distribution of Literary and Informational Passages in the 2009 NAEP Reading Framework" (p. 3). However, these percentages (70% for informational passages in high school; 30% for literary passages) are for NAEP's *reading assessments*, not the ELA *curriculum*. NAEP's percentages were not intended to guide the allotment of class time for the high school literature curriculum. NAEP's reading tests were intended by Congress to assess reading skills developed outside of school and in the other subjects taught in high school as well as the English class. Moreover, they do not assess drama at all because, NAEP claims, a coherent excerpt from a play would be too long for a test item (even though Massachusetts has regularly assessed excerpts from plays by recognized authors such as Shakespeare and Moliere on its ELA tests). Further, a report by Achieve noted very clearly that "literary text should remain the reading centerpiece of the English classroom," that the "NAEP reading assessment is not an 'English' test in the traditional sense," and that "if NAEP were an end-of-course English test, they would recommend a 50 percent or higher representation of literature" (Achieve, 2005, p. 21).

The introduction to the March draft ELA standards acknowledges the limitations of NAEP's percentages for guiding the allotment of time for literary study in the high school curriculum.

The NAEP framework also makes clear that significant reading of informational texts should take place outside of the ELA classroom in order for students to be ready for college and careers. The NAEP framework applies the sum of all the reading students do in a grade, not just their reading in the ELA context. The percentages do not imply, for example, that high school ELA teachers must teach 70 percent informational  text; they demand instead that a great deal of reading should occur in other disciplines" (p. 3, also see p. 2 and elsewhere).

Nevertheless, Common Core has chosen to include standards for "literacy in history/social studies and science" in the title and documents for its English language arts standards, in a separate section for grades 6-12. And it explicitly notes that its grades 6-12 standards will require "much greater attention to literary nonfiction than has been traditional." Why did Common Core's March draft mention NAEP's percentages at all if it did not intend to place more stress on both literary non-fiction and informational reading than it thinks English teachers now give it? In other words, a reference to these percentages was unnecessary if English teachers are not to be expected to spend more time teaching informational reading. We do not yet know if and how the 70 percent figure for NAEP's reading assessments that Common Core is using to justify a stress on the reading of literary non-fiction and informational texts in the high school English curriculumwill influence test specifications for the common assessments to be developed in the English language arts. Will the high school exit test in ELA be just for English teachers? Or will all high school teachers be held accountable for the results of the non-literary items on ELA tests?

It remains to be seen what distribution of literary and informational passages the USED requires in grants to test developers for the common assessments to be based on Common Core standards. If we are to believe the March draft that NAEP's percentages "do not imply that high school ELA teachers must teach 70 percent informational text," then we should not see a 60%/40% distribution or even a 50%/50% distribution. In fact, we should expect to see NAEP's percentages almost reversed at the high school level for ELA tests-- close to 70% for literary passages and 30% for informational passages—or a distribution that is much closer to what English teachers in Massachusetts recommended in 1997 for the state's ELA tests. In 1997, they recommended about 60% literary and 40% informational passages at all grade levels, with 60% of the literary passages based on authors in Appendix A (a recommended list reflecting this nation's civic and literary heritage) and 40% of the literary passages based on authors in Appendix B (a recommended list reflecting contemporary authors in this country and elsewhere).

***5. No international benchmarking***

If there is any doubt that the ELA College- and Career-Readiness Standards and the grade-level standards have not been benchmarked internationally, readers need to look at British Columbia's high school exit test and required readings (Common Core, *Why We're Behind: What Top Nations Teach Their Students But We Don't.* 2009, pp. 25-33) and the Appendix on what Finland requires in the upper secondary school, in the Pioneer Institute's White Paper "Why Race to the Middle?" by Ze'ev Wurman and Sandra Stotsky (February 2010).

***6. Too few content-rich literature and reading standards in grades 6-12 to provide the intellectual framework needed for these grades***

The number of such standards for grades 6-12 is appallingly low, and here they all are:

1. Grade 9-10: Analyze a wide range of nineteenth- and early-twentieth-century foundational works of American literature, comparing and contrasting approaches to similar ideas or themes in two or more texts from the same period.

2. Grades 11-12: Compare and contrast multiple interpretations of a drama or story (e.g., recorded or live productions), distinguishing how each version interprets the source text. (This includes at least one play by Shakespeare as well as one play by an American dramatist.)

3. Grades 9-10: Analyze documents of historical and literary significance, including foundational U.S. documents (e.g., the Declaration of Independence, the Preamble to the Constitution, the Bill of Rights) for their premises, purposes, and structure.

4. Grades 11-12: Analyze how various authors express different points of view on similar events or issues, assessing the authors’ assumptions, use of evidence, and reasoning, including analyzing seminal U.S. documents (e.g., *The Federalist*, landmark U.S. Supreme Court majority opinions and dissents).

These standards are based mainly on two standards in the fine set of high school exit standards for the English language arts set forth in Achieve's American Diploma Project. Unfortunately, these content-rich standards are not placed among the ten CCRS that guide all of Common Core's ELA standards, where one might have expected them to appear. The pitifully small number of content-rich standards in Common Core's grade-level standards is a direct reflection of the crippling effects of these ten content-empty and culture-free "College- and Career-Readiness Standards."

**III. Recommendations**

1. Remove the ten culture-free and content-empty College- and Career-Readiness Standards for Reading (now listed on p. 6 and p. 31 of the March draft). They serve no academically constructive role. They should be replaced by Standard D and its subsidiary standards in Conley's 2003 list and by the first two standards in Achieve's American Diploma Project's high school exit test for ELA. These standards can serve to generate many academically substantive grade-level standards from grades 6 to 12.

2. Removal of material on the "complexity" formula, both in the grade-level standards and in the appendix. This formula cannot easily be used by elementary teachers, won't be used by appropriately educated English teachers, and is inappropriate to include in a standards document.

3. Completely revise the vocabulary strand in grades 6-12 and remove the pedagogically useless standards. Common Core should ask its ELA draft writers to study carefully the vocabulary strand in the California 1998 standards or the vocabulary strand in Massachusetts's 2001 English language arts curriculum framework in order to understand better the kinds of vocabulary standards Massachusetts teachers have found useful in their classroom instruction. The Bay State's Department of Education staff worked out an even better sequence of academic standards for vocabulary teaching/learning in the November 2009 draft revision, and there is no reason why the nation as a whole should not have such standards as well.

4. Remove all the "literacy standards for history/social studies and science" from future drafts for ELA unless the context for using the many fine titles of historical documents is made clear in the English language arts material. If they are to be included in ELA documents, English teachers must be given both clear direction on their historical and political significance and sufficient historical context for teaching students how to understand these documents.

**Appendix**

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Written Testimony sent to the New Jersey Board of Education

**Read at the March 17, 2010 meeting**

I and my colleagues at the Association of Literary Scholars, Critics, and Writers have read through the March 2010 public comment draft of the proposed English language arts standards. We are pleased to see literary and cultural knowledge specified in several grade-level standards at the high-school level, and we note with appreciation the strong statements, in the sidebar on p. 31, about the importance of this knowledge. A study of the literary history and literary context for the many culturally significant “illustrative” titles in Appendix B is vital for future generations of American students.

At the same time, we are disappointed to see nothing in the “college-and career-readiness standards” (p. 31) that serves to frame cumulative, graduated learning in literary history, traditions, forms, styles, and significant writers. These standards, not the sidebar, will be the basis for common assessments, and we question the indication of the draft-writers that “college readiness” can be achieved by content-free standards. The contingent content for exercising elementary interpretive and paraphrasing skills in these standards is not adequate. Any other subject would have graduated content, but the drafters of these standards imagine that “college readiness” can be content-free when it comes to “literature.”

We cannot endorse the absence of content-rich *literary* standards in “college readiness” any more than we can endorse just a sporadic and infrequent inclusion in the grade-level standards. This absence in this public-comment draft reflects what seems to us to have been a nearly systematic exclusion of those with expertise in literary study in the development of the standards. No one with expertise in the study of literature as a subject in itself was appointed to the standards-development committees, and those who attended the open forum last December, and then again in February, reported that they were given no way to argue a case that had seemed to have been pre-decided. We are surprised and concerned that the media have failed to note the exclusion of literary study from what are deemed “college readiness” standards. Without graduated, substantive content, adequate preparation for college study in any subject would be seriously compromised. Although there is nothing positive to object to in the statement of standards, we lament the absence of literary study in a necessary, valuable, and vital distinction from “language arts.”

Yours sincerely,

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