

## The Massachusetts Board of Elementary and Secondary Education

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).

6. "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.

7. "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

Sandra Stotsky. (2000). The state of literary study in national and state English language arts standards: Why it matters and what can be done about it. In S. Stotsky (Ed.), *What's at Stake in the K-12 Standards Wars: A Primer for Educational Policy Makers* (pp. 237-258). NY: Peter Lang Publishers.

Sandra Stotsky, with Lisa Haverty. (2004). Can a state department of education increase teacher quality? Lessons learned in Massachusetts. In D. Ravitch (Ed.), *Brookings Papers on Education Policy, 2004* (pp. 131-180). Washington, DC: Brookings Institution.

Sandra Stotsky. (2009a). [Why Ohio needs world-class content standards for K-12, and how to get them. Invited written statement and testimony for a Hearing of the Ohio Senate Education Committee on April 15, 2009.](#)

Sandra Stotsky. (2009b). How to develop internationally benchmarked mathematics standards (as well as standards for other subjects). Invited written statement and testimony for a Hearing of the Joint Committee on the Public Schools, New Jersey State Legislature, June 3, 2009.

Ze'ev Wurman and Sandra Stotsky. (February 2010). [Why Race to the Middle? Pioneer Institute White Paper No. 52.](#) Boston: Pioneer Institute.

R. James Milgram and Sandra Stotsky. (March 2010). [Fair to Middling: A National Standards Progress Report, Pioneer Institute White Paper No. 56.](#) Boston: Pioneer Institute.

Sandra Stotsky and Ze'ev Wurman. (May 2010). The Emperor's New Clothes: National Assessments Based on Weak "College and Career Readiness Standards," Pioneer Institute White Paper No. 61. Boston: Pioneer Institute.