I thank Chairman Gerald Stebelton and the House Education Committee for the opportunity to comment on Common Core’s English language arts standards. I begin with a few remarks on Common Core’s Validation Committee, on which I served from 2009-2010. I then offer general comments on Common Core’s English language arts standards based on my analysis of them and observations of classroom lessons aligned to them. As I talk, I will give examples from its vocabulary standards and reading standards for literary and informational texts because these are the most damaging of its ELA standards. I end with suggestions for further discussion and a bibliography of recent reports I have co-authored supporting in greater detail the points I make.

**Common Core’s Standards Writers and Validation Committee**

Common Core’s K-12 standards, it is regularly claimed, emerged from a state-led process in which experts and educators were well represented on the committees presumably put together by the National Governors Association (NGA), the Council for Chief State School Officers (CCSSO), and Achieve, Inc. However, David Axelrod has recently claimed that it was an Obama initiative ([http://eagnews.org/axelrod-claims-common-core-an-obama-initiative/](http://eagnews.org/axelrod-claims-common-core-an-obama-initiative)). Moreover, the people who wrote the standards did not represent the relevant stakeholders. Nor were they qualified to draft standards intended to “transform instruction for every child.” And the Validation Committee that was created to put the seal of approval on the drafters’ work was useless if not misleading, both in its membership and in the procedures they had to follow.

**Who were the standards writers and what were their qualifications?** In the absence of official information to date from the three private organizations themselves, it seems likely that Achieve, Inc. and the Gates Foundation selected most of the key personnel to write the college-readiness standards. Almost all the members, it turned out, were on the staff of Achieve, Inc. and three other test/curriculum development companies—American College Testing (ACT), America’s Choice (a for-profit project of the National Center on Education and the Economy, also known as NCEE), and the College Board (CB). Not only did the Standards Development Work Group fail to include any high school mathematics teachers, it failed to include any English professors or high-school English teachers. How could legitimate standards in either subject be created without the very two groups of educators who know the most about what students should and could be learning in secondary mathematics and English/reading classes? Because the 24 members of the Standards Development Work Group labored in secret, without open meetings, sunshine-law minutes of meetings, or accessible public comment, their reasons for making the decisions they did are lost to history.

The absence of relevant professional credentials in the two grade-level standards-writing teams helps to explain the flaws in these standards, which differ from the college- and career-readiness standards on which the high school exit tests are to be based. The “lead” writers for the grade-level ELA standards, David Coleman and Susan Pimentel, had never taught reading or English in K-12 or at the college level. Neither has a doctorate in English, nor had either of them ever published serious work on K-12 curriculum and instruction. Neither had a reputation for literary scholarship or research in education; they were virtually unknown to English language arts educators and to higher education faculty in rhetoric, speech, composition, or literary study. A
third ELA standards writer originally listed as part of the three-person grade-level standards-writing team—James Patterson, a staff member at ACT—dropped out of the limelight early on. What role he played is unknown.

Two of the lead grade-level standards-writers in mathematics had relevant academic credentials for the subject. Jason Zimba was a physics professor at Bennington College at the time, while William McCallum was (and remains) a mathematics professor at the Arizona State University. However, Phil Daro, the only member of this three-person team with teaching experience (middle school mathematics) had majored in English as an undergraduate; he was also on the staff of NCEE. None of the three had ever developed K-12 mathematics standards before.

Who recommended these people as standards-writers and why, we still do not know. No one in the media commented on their lack of credentials for the task they had been assigned. Indeed, no one in the media showed the slightest interest in the qualifications of the grade-level standards-writers. Nor did the media comment on the low level of college readiness they worked out. Zimba is reported in the official minutes of a public meeting the Massachusetts Board of Elementary and Secondary Education in March 2010 as saying: “…the concept of college readiness is minimal and focuses on non-selective colleges.” The video tape of the meeting provides the context for this statement. Zimba exemplified this statement in many ways, e.g., “…the minimally college-ready student is a student who passed Algebra II.”

In contrast, Coleman and Pimentel have never explained in public how they defined college and career readiness in ELA or how they would exemplify its practical meaning with respect to the level of reading difficulty or specific texts students would have to demonstrate they understand. While Appendix B offers a range of titles in grades 11/12 indicating the “quality and complexity” of texts that students should be able to read, the titles span such a wide range of reading levels in grades 11/12 that it is not clear what level constitutes “college and career readiness.” Titles in grades 11/12 include Dreaming in Cuban, with a low middle school reading level according to a widely-known readability formula titled ATOS for Books, and Thomas Paine’s Common Sense.

Who were members of the Validation Committee? The federal government could have funded an independent group of experts to evaluate the soundness and validity of the standards it was incentivizing the states to adopt, but it did not do so. Instead, NGA and CCSSO created their own Validation Committee (VC) in 2009 of about 25-29 members to exercise this function. Some were ex officio, others were recommended by the governor or commissioner of education of an individual state. No more is known officially about the rationale for the individuals chosen for the VC. Similar to the composition of the Standards Development Work Group and the standards-writing teams, the VC contained almost no academic experts on ELA and mathematics standards; most were education professors or associated with testing companies, from here and abroad. There was only one mathematician on the VC—R. James Milgram—although there were many mathematics educators on it, that is, people with doctorates in mathematics education or appointments in an education school, and/or who worked chiefly in teacher education. Stotsky was the only nationally recognized expert on English language arts standards by virtue of her work in Massachusetts and for Achieve, Inc.’s American Diploma Project high school exit standards for ELA and its backmapped standards for earlier grade levels.

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**What was the purpose of the Validation Committee?**

Culmination of participation on the committee was reduced to signing or not signing a letter by the end of May 2010 asserting that the not-yet-finalized standards were:

1. Reflective of the core knowledge and skills in ELA and mathematics that students need to be college- and career-ready.
2. Appropriate in terms of their level of clarity and specificity.
3. Comparable to the expectations of other leading nations.
4. Informed by available research or evidence
5. The result of processes that reflect best practices for standards development.
6. A solid starting point for adoption of cross-state common core standards.
7. A sound basis for eventual development of standards-based assessments.

Professor Milgram and I were two of the five members of the VC who did not sign off on the standards. So far as we could determine, the Validation Committee was intended to function as a rubber stamp in spite of the charge to validate the standards. Despite our repeated requests, we did not get the names of high-achieving countries whose standards were supposedly used as benchmarks for Common Core’s standards chiefly because Common Core’s standards were (intentionally) not internationally benchmarked (or made comparable to the most demanding sets of standards elsewhere); all Common Core now claims is that it was “informed by” documents in other countries. It did not offer any research evidence to support its omission of high school mathematics standards leading to STEM careers, its stress on writing over reading, its division of reading instructional texts into “information” and “literature,” its experimental approach to teaching Euclidean geometry, its deferral of the completion of Algebra I to grade 9 or 10, or its claim about the value of informational reading instruction in the English classes. It couldn’t because there is no evidence to support Common Core’s revision of the K-12 curriculum. Nor did Common Core offer evidence that its standards meet entrance requirements for most colleges and universities in this country or elsewhere—or for a high school diploma in many states.

The lack of an authentic validation of Common Core’s so-called college-readiness standards (that is, by a committee consisting largely of discipline-based higher education experts who teach undergraduate mathematics or English/humanities courses) before state boards or commissioners of education voted to adopt these standards suggests their votes had no legal basis.

**General Comments**

1. **Most of Common Core’s college-readiness and grade-level reading standards are content-free skills.** Most of the statements that are presented as vocabulary, reading, and literature standards (standards which would indicate content if it is indicated anywhere) point to no particular level of reading difficulty, little cultural knowledge, and few intellectual objectives. These statements are best described as skills or strategies when they can be understood at all and therefore cannot be described as rigorous standards. Here is one example. The Anchor Standard is: “Analyze how and why individuals, events, and ideas develop and interact over the course of a text.” The grades 11/12 standard “clarifying” this Anchor Standard is: “Analyze a complex set of ideas or sequence of events and explain how specific individuals, ideas, or events interact and develop over the course of the text.” This is clearly a free-floating skill and can be applied to anything from “The Three Little Pigs” to *Moby-Dick*. It is also an example of the many poorly written standards in this document.

Skills training alone doesn’t prepare students for college. They need a fund of content knowledge. But Common Core’s ELA standards (and its literacy standards for other subjects) do not specify
the literary/historical knowledge that students need. The document provides no list of recommended authors or works, just examples of “quality and complexity.” The standards require no British literature aside from Shakespeare. They require no authors from the ancient world or selected pieces from the Bible as literature so that students can learn about their influence on English and American literature. Nor do they require study of the history of the English language. Without requirements in these areas, students are not prepared for college coursework or a career (or active citizenship) in an English-speaking country. In effect, students have been deprived of their own civic and cultural inheritance in a Western country whose tradition stresses individual rights and responsibilities.

2. **Common Core’s ELA standards stress writing more than reading at every grade level—to the detriment of every subject in the curriculum.** There are more writing than reading standards at almost every grade level in Common Core, a serious imbalance. This is the opposite of what an academically sound reading/English curriculum should contain, as suggested by a large, century-old body of research on the development of reading and writing skills. The foundation for good writing is good reading. Students should spend far more time in and outside of school on reading than on writing to improve reading (and writing) in every subject of the curriculum.

3. **Common Core’s writing standards are developmentally inappropriate at many grade levels.** Adults have a much better idea of what "claims," "relevant evidence," and academic "arguments" are. Most elementary children have a limited understanding of these concepts and find it difficult to compose an argument with claims and evidence. It would be difficult for children to do so even if Common Core’s writing standards were linked to appropriate reading standards and prose models. But they are not. Nor does the document clarify the difference between an academic argument (explanatory writing) and opinion-based writing or persuasive writing, confusing teachers and students alike. Worse yet, Common Core’s writing standards stress emotion-laden, opinion-based writing in the elementary grades. This kind of writing does not help to develop critical or analytical thinking, and it establishes a very bad habit in very young children. There is no research evidence to support this kind of pedagogy.

4. **Common Core expects English teachers to spend at least half of their reading instructional time at every grade level on informational texts—a percentage from which students cannot benefit intellectually.** Common Core lists 10 reading standards for informational texts and 9 standards for literary texts at every grade level, thus reducing literary study in the English class to less than 50%. However, there is NO body of information that English teachers are responsible for teaching, unlike science teachers, for example, who are charged with teaching information about science. English teachers are trained—by college English departments and teacher preparation programs—to teach the four major genres of literature (poetry, drama, fiction, and nonfiction) and the elements of rhetoric, not a large body of fragmented information on a variety of contemporary, practical, or historical topics.

5. **Common Core reduces opportunities for students to develop critical thinking.** Critical, or analytical, thinking is developed in the English class when teachers teach students how to read between the lines of complex literary works. Analytical thinking is facilitated by the knowledge that students acquire in other ways and in other subjects because it cannot take place in an intellectual vacuum." As noted in a 2006 ACT report titled “Reading Between the Lines:” “complexity is laden with literary features.” According to ACT, it involves “literary devices,” “tone,” “ambiguity,” “elaborate” structure, “intricate language,” and unclear intentions. Critical thinking applied to low-complexity texts, ACT concluded, is inferior to critical thinking applied to high-complexity texts. Thus, reducing literary study in the English class in order to increase
informational reading not only reduces the opportunity for students to learn how to do critical thinking, but also, in effect, retards college readiness.

**6. Common Core’s standards are not “fewer, clearer, and deeper.”** They may appear to be fewer in number than those in many states because very different objectives or activities are often bundled incoherently into one “standard.” As a result, they are not clearer or necessarily deeper. These bundled statements posing as standards are not easy to interpret, and many are poorly written. For example, a literature standard for grades 9/10 asks students to: “determine a theme or central idea of a text and analyze in detail its development over the course of the text, including how it emerges and is shaped and refined by specific details; provide an objective summary of the text.” This wretched sentence is a jumble of at least three different activities: determining a theme, tracing and analyzing its development, and summarizing a complete text.

If Common Core’s ELA standards are to be used, they must first be revised by experienced, well-trained high school English teachers for clarity and readability so that they can consistently guide curriculum development. Private schools, sectarian or non-sectarian, are under no obligation to adopt them “as a whole,” as were state boards of education when they voted to adopt a copyrighted document.

**7. The vocabulary standards are weak, often inappropriate, and more often poorly exemplified.** These standards should be the strongest strand in Common Core’s ELA standards because of the importance of vocabulary knowledge in reading comprehension. But they are not rigorous and often contain inappropriate pedagogical advice. For example, in grade 2, students are to “use sentence-level context as a clue to the meaning of a word or phrase” as the first of many strategies to determine the meaning of an unknown word. In grade 2, students should be first asked to sound out unfamiliar words to see if they recognize them as part of their own vocabulary since the “meaning” of text-appropriate words should not be the problem in grade 2. Identification of a written word (a reading skill) is. Moreover, students need to be able to read the “context” in order to use it as a clue.

As another example, in grade 2, students are also to “use glossaries and beginning dictionaries to determine or clarify the meaning of words and phrases.” However, they have not been taught the difference between these two types of references; one gives the technical meaning, the other the most frequent meaning (which may not be the technical meaning). This advice is a particular disservice to children who need strong vocabulary development.

As yet another example, in grade 2, students are to “distinguish shades of meaning among closely related verbs (e.g., *toss, throw, hurl*) and closely related adjectives (e.g., *thin, slender, skinny, scrawny*).” Since many of these words are unlikely to be found in grade 2 texts, it is not clear what grade 2 teachers can do with this standard.

**Summary**

1. Common Core’s ELA standards are NOT rigorous. They were designed to allow mid-level grade 11 students to enroll in credit-bearing courses in a non-selective college.
2. Common Core’s standards are NOT internationally benchmarked and will not make any of our students competitive.
3. There is NO research to support Common Core’s stress on writing instead of reading.
4. There is NO research to support Common Core’s stress on informational reading instead of literary study in the English class.
(5) There is no research to support the value of “cold” reading of historical documents, a bizarre pedagogy promoted by the chief architect of Common Core’s ELA standards.

(6) Available research suggests exactly the opposite of what Common Core’s document and standards promote in the ELA classroom.

Suggestions to Ohio Legislators
1. Vote out Common Core’s standards and adopt ELA and mathematics standards from states whose standards were internationally benchmarked (e.g., California, Indiana, Massachusetts). Ohio could also adopt Minnesota’s mathematics standards, which are not Common Core’s because mathematicians at Minnesota’s own universities successfully protested adoption of Common Core’s mathematics standards. The English language arts curriculum framework I compiled in 2010, based on the 2001 Massachusetts standards, has literature and reading standards that richly provide examples of the classical literature traditionally taught in Ohio schools, and they are free of charge or copyright issues. They also contain two appendices that were in the first-rate standards the state once had, listing recommending authors of our civic and literary heritage, as well as contemporary authors. http://alscw.org/news/?p=524.

In other words, it need not take even two months to develop superior academic standards for Ohio students if you are willing to look at what a high-performing state has already used. And released test items for those standards are available without charge.

2. Develop a set of entrance exams (matriculation tests) for your own institutions of higher education, drawing on engineering, science, and mathematics faculty and literary/humanities scholars at your own institutions. They could also ask these faculty members to collaborate with mathematics and science teachers in Ohio high schools in designing syllabi for the advanced mathematics and science courses in Ohio high schools. Why should federal education policy-makers or test developers mandate low admission requirements in mathematics, science, or English to Ohio colleges and universities? Common Core’s college readiness level may be at about grade 8 or lower when a cut score is decided upon.

3. Offer two different types of high school diplomas. Not all high school students want to go to college or can do the reading and writing required in authentic college coursework. Many have other talents and interests and should be provided with the opportunity to choose a meaningful four-year high school curriculum that is not college-oriented. One diploma, like the old New York Regents Diploma, would be for students willing to do advanced work in mathematics, science, and English or the humanities (perhaps called an Advanced Academic Diploma). The other could be a General Competency Diploma.

4. Review and revise if needed all standards at least every five to seven years using identified Ohio teachers, discipline-based experts in the arts and sciences, and parents. All assessments should also be reviewed by Ohio teachers and discipline-based experts in the arts and sciences before the tests are given.

5. Restructure and reform teacher and administrator training programs in Ohio institutions of higher education to ensure that the graduates of these education schools have stronger academic credentials than they now have. Raising the floor for all children should be our primary educational goal, not closing demographic gaps among groups of children. The only thing we know from education research on teacher effectiveness is that effective teachers know the subject matter they teach. We need to raise the academic bar for every prospective teacher we admit to a teacher training program in an education school. That is the first step in raising student achievement in this country, not a set of paper standards.
References


