## Position Statement: Should Alabama Rescind Its Adoption of the Common Core Standards

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**My background**: I am an executive with Monolithic 3D, a Silicon Valley semiconductor startup. I spent much of my professional life as an engineer and an executive in the computer and semiconductor technology business, 25 of them in the Silicon Valley. I became involved in education in the early 1990s, and I participated in developing California's education standards and assessments in mathematics since then in various capacities. Between 2007 and 2009 I served as a senior policy adviser with the Office of Planning, Evaluation and Policy Development at the U.S. Department of Education. Throughout the development of the Common Core standards I analyzed the mathematics drafts for the Pioneer Institute and for the State of California. In the summer of 2010 I served on the California Academic Content Standards Commission that reviewed the adoption of Common Core for California. I earned my BSEE and MSEE degrees from the Technion in Israel.

**Summary of my position:** I believe that Alabama would be wise to retain its own 2009 academic standards in English Language Arts and in Mathematics, and to rescind its 2010 adoption of the Common Core standards. I base my position both on the academic quality of both sets of standards, as well as on the imminent risk of Alabama irrevocably losing control over what it teaches its students.

I will support my position through reviewing the following points.

- The Common Core's Mathematics standards are of similar quality as Alabama's own, and their definition of college-readiness is sub-par when compared with actual university requirements and with the standards of foreign nations
- Assessment is important in driving curriculum, and the evolution of national assessment developed through federal sponsorship will undermine state control over textbooks, curricular stresses, and assessment costs
- The U.S. Department of Education is already forcing the states to adopt its central command and control policy preferences through coercive measures, including by offering newly created waivers to NCLB requirements in exchange for adopting Common Core's standards and their national assessment

## The quality of Common Core's Mathematics standards and their sub-par definition of college-readiness

The Fordham Institute has been rating academic standards for over a decade, and its recent review of the Common Core and Alabama standards found their quality difference, in both mathematics and English Language Arts, "Too Close to Call." Fordham was very complimentary about Alabama's own mathematics standards, describing them as "rigorous," as well as "easy to understand and exceptionally clear and specific . . . , making them easier to read and follow than Common Core." In addition, it found Alabama's high school content "organized so that standards addressing specific topics, such as quadratic functions, are grouped together in a mathematically coherent way. The organization of the Common Core is more difficult to navigate." In fact, Fordham rated Alabama's mathematics standards as highly as it rated the much praised Massachusetts standards.

But the issues with the quality of Common Core run deeper than even Fordham's evaluation shows. State standards are geared toward high school graduation, while the Common Core claims to go much further—to become a benchmark for college-readiness. And that is where the Common Core fails miserably: its so-called "college readiness" standard in mathematics is below Algebra 1, Algebra 2, and Geometry, the enrollment requirement of most four-year state colleges across the nation, including the University of Alabama. Reviews by professional mathematicians from Stanford (Milgram, 2010) and the Courant Institute at the New York University (Goodman, 2010) also found the Common Core standards below the levels other high-achieving nations set for their students. What is worse, the Common Core imposes a new, experimental method for teaching geometry that has not been successfully tried anywhere in the world—and nowhere mentions its experimental and risky nature.

The real issue, evidently, is not with the quality of Alabama's standards, which are already excellent. Good academic standards are only the first step on the road to increased achievement. Both California and Massachusetts have excellent academic standards, yet their respective educational achievement could not be more different. To increase educational achievement one needs to have one's ducks all lined up, so to speak, and standards are only one such duck. Trained teachers, standards, aligned instructional materials, and good assessments with challenging cut-scores are the other components necessary for high achievement.

Alabama has been steadily improving those components, as the recent NAEP reading results show. It has already invested in aligned textbooks and teacher training, and the final piece of the puzzle is to improve the quality of its assessment and, in particular, the test cut-scores that seem shamefully low. This, however, is a relatively simple and inexpensive task compared to what has already been done. Why should Alabama choose to give up on its entire investment in education over the last decade and start afresh with an experimental new set of standards of questionable quality, especially with all the attendant costs of purchasing new textbooks and sending all of its teachers for retraining?

## The importance of assessment in driving curriculum and the evolution of national assessment developed through federal sponsorship

It has been frequently said that what is tested is what is taught. That truth has not been lost on the U.S. Department of Education (Department) and it has been trying to sponsor national assessment for many years. Some of us still remember the Clinton-era "Voluntary" National Test that was ultimately defeated by Congress.

This time the Department bypassed Congress, using over \$300 million of stimulus funds outside the Department's regular budget to work around its legal prohibition to "exercise any direction, supervision, or control over the curriculum." Many states, including Alabama, found joining one or both of the two national assessment consortia sponsored through ED irresistible, due to their financial promise and to the Department's forcing states to join as a condition of participation in Race to the Top grant programs.

The consortia promised the rainbow but as time passed they had to scale down their grandiose plans. It is less and less clear how extensive, how innovative, and—most importantly—how expensive their tests will be. Test development is a fixed cost while its annual administration is not, and the federal government funded only the test development. Alabama spends only about \$20 per student annually on assessment, but the administration costs of the new consortia assessments may end up many times higher. Perhaps it is wise, then, that Alabama took a "wait and see" position and joined both consortia as an observer state, choosing to sit on the fence given the risky nature of that effort.

The risks of joining the consortia are not limited to their direct costs. Allowing an external body, outside the state's control, to conduct the assessment leads to two things. First, the state is no longer in control of its own curriculum. One can argue that this decision has already been made when accepting the standards, yet that is not so. The standards do not define the curricular stresses, the examples used, or the reading lists—the tests do. And with the control of the test in far-away places, one can guarantee that the content of the assessment—and the curriculum it drives—will be taken away from the state citizenry. There will be no more meaningful public review of what is taught in the state's schools, or assessed on its examinations every year.

Proponents of Common Core argue that Alabama will be able to withdraw from the Common Core and its assessments if Alabama is unhappy with them. That is easier said than done, which leads to the second point: Once a state's infrastructure to support test development has been dismantled and the talent has gone, it will take years and millions of dollars to put it all back together under state control. The federal government will in the meantime place higher and higher obstacles on the path of the states attempting to exercise that right, in the name of "prove to us that you are not harming the kids by doing that." We have seen the federal government begin to raise those barriers already in its new NCLB waiver procedures. Which brings us to the last point.

## The efforts of the U.S. Department of Education to sponsor the development of national standards and assessment, and Department's enforcement efforts through waivers and legislation of the Elementary and Secondary Education Act

I will not go into the philosophy driving the efforts of the U.S. Department of Education to develop these national standards. One can find variety or reasons which one can consider inherently good or bad depending on one's philosophy and beliefs. Instead, I'd rather focus on what will be the inevitable results, and on the steps we can already observe on the road there.

The Department believes that it is the most qualified to make educational decisions for the nation's children. That is the nature of the beast, as it believes that it is made of the best and most qualified that are filtered through the states' systems and funneled into federal agencies. Consequently, the Department spends much of its efforts ensuring that the states follow its regulations, because it thinks the regulations reflect what is best for children.

The specifics and the stresses may change from administration to administration, but no administration will be able to resist using the tools given to it. Consequently, if we give the federal Department the control over what our children can learn, and how they will be assessed on what they learn, each administration will infuse it with its own principles.

The Common Core standards were supposedly developed "by the states" under the auspices of NGA and CCSSO. Its supporters were desperate to maintain this façade, and begged ED to tread lightly on regulations insisting on their adoption by the states; yet even these pleas did not stop the Department from effectively making the adoption of Common Core and the joining of the assessment consortia prerequisites for participation in its Race to the Top grant program. More recently, Secretary Duncan announced an NCLB "flexibility waiver" program that promises to release states from their looming "100% proficient" target if they follow the federal Department's policy preferences. His suggested replacement for that "100% proficiency" target?

To receive this flexibility, an SEA must demonstrate that it has college- and careerready expectations for all students in the State by adopting **college- and careerready standards** in at least reading/language arts and mathematics.

And what are, one wonders, those "college- and career-ready" standards? As I described above, the Common Core are the only standards that claim, albeit falsely, that they are "college and career ready" while others are simply high school graduation standards. Can states use their own standards instead? Not so fast, says the administration. "College- and Career-ready Standards" are:

(1) standards that are common to a significant number of States; or (2) standards that are approved by a State network of institutions of higher education, which must certify that students who meet the standards will not need remedial course work at the postsecondary level.

Here we see how the administration is already enforcing its preference of the Common Core over any other standard. The Common Core standards are accepted without any proof of their quality, while states must jump through hoops to show theirs are good enough. This is just the beginning of the process, which will only make it harder on the states to escape the nationalization of education as time goes by.

The supposed benefits and the perceived inevitability that our federal government attempts to associate with nationalization of education are not supported by facts. Canada and Australia do not have nationalized education systems, yet they score very well on international assessments. In contrast, Demark and France do have centralized systems and do not score that well. The myth that globalization implies that successful education requires nationalization is just that—a myth propagated by Central Planners

As simple as it sounds, there is no rational reason for Alabama to allow the federal government to take over its education.