I thank Senator Michael Fair, member of the Senate Committee on Education, for the opportunity to speak to a bill amending Article 5, Chapter 5, Title 59 of the 1976 Code to enable South Carolina to withdraw from participation in the Common Core State Standards Initiative.

**My professional background:** I draw on much state and national experience with K-12 standards, curricula, and assessments. I was the senior associate commissioner in the Massachusetts Department of Education from 1999-2003 where, among other duties, I was in charge of the development or revision of all the state's K-12 standards. I reviewed all states' English language arts and reading standards for the Thomas B. Fordham Institute in 1997, 2000, and 2005. I co-authored Achieve's American Diploma Project high school exit test standards for English in 2004. I served as an advisor on South Carolina's English language arts standards in 2006. I served on Common Core's Validation Committee from 2009-2010. Finally, I am the author of *The Death and Resurrection of a Coherent Literature Curriculum: What Secondary English Teachers Can Do*, to be published by Rowman & Littlefield in June 2012.

I will speak to the following points:

1. **The mediocre quality of Common Core's English language arts/reading standards, especially in grades 6-12.**

2. **The non-transparent process that was used to develop Common Core's standards.**

3. **How Common Core's English language arts/reading standards will negatively affect English and reading teachers.**

**Point 1: The mediocre quality of Common Core's ELA standards, especially in grades 6-12.**

Common Core’s “college readiness” standards for English language arts and reading are simply empty skill sets. They do not necessarily point to readiness for a high school diploma because we do not yet know the reading level of the passages to be used on tests based on these standards, and where the cut score will be set. To judge by the reading levels of the high school examples of "complexity" in Common
Core's Appendix B, the average reading level of the passages on the common tests now being developed to determine "college-readiness" may be at about the grade 7 level.

As empty skill sets, Common Core's ELA standards cannot strengthen the high school curriculum and they cannot reduce post-secondary remedial coursework in a legitimate way. Its grade-level standards do not supplement its "college readiness" standards in useful ways. As empty skill sets, Common Core's ELA "college readiness" standards weaken the base of literary and cultural knowledge needed for authentic college coursework. South Carolina's own literature standards did much better, as Fordham's 2010 review noted: "To illustrate the quality and complexity of reading that students should master, South Carolina appends a suggested reading list organized by grade spans and genres. The titles represent a thoughtful selection of literary and informational texts."

To indicate the deficiencies in Common Core's ELA "college readiness" and grade-level standards, I quote from the Fordham Institute's review, which charitably gave these standards a B+:

**Overview:** …They would be more helpful to teachers if they attended as systematically to content as they do to skills, especially in the area of reading…

**Clarity and Specificity:** …The organization of the reading standards is hard to follow…They are organized into four categories…Since many kinds of texts, genres, sub-genres, and their characteristics are discussed in each category, it is also difficult to determine whether a logical sequence covering all of this important content has been achieved. …the organization of the reading strand, as well as the instances of vague and unmeasurable language, mean that the standards do not ultimately provide sufficient clarity and detail to guide teachers and curriculum and assessment developers effectively.

**Content and Rigor:** …The reading standards for both literature and informational text fail to address the specific text types, genres, and sub-genres in a systematic intersection with the skills they target. As written, the standards often address skills as they might apply to a number of genres and sub-genres. As a result, some essential content goes missing.

The…standards for grades 6-12 exhibit only minor distinctions across the grades, such as citing evidence “to support analysis of what the text says explicitly as well as inferences from the text.” Several problems surface here. First, these standards don’t properly scaffold skills from grade to grade. For example, quoting from text is arguably easier than paraphrasing, but the standards require mastery of paraphrasing first. Second, these standards are also repeated verbatim in the informational text strand, thus making no distinction between applying this skill to literary and informational text.

What’s more, while some genres are mentioned occasionally in the standards, others, such as speeches, essays, and many forms of poetry, are rarely if ever mentioned by name. Similarly, many sub-genres, such as satires or epic poems, are never addressed.

Many defining characteristics of the various genres are also rarely, if ever, mentioned…Where literary elements are mentioned, their treatment is spotty. …

The Writing standards include too many expectations that begin with the phrase, “With guidance and support from adults….” Such standards are problematic because they fail to adequately scaffold or clearly delineate what students should be able to do.

One troublesome aspect of the writing standards is the persistently blurry line between an “argument” and an “informative/explanatory essay.” …

**Bottom Line:** …overwhelming focus on skills over content in reading combined with confusion about the writing standards, lack of detail about oral presentations, and the sporadic rigor of the media standards.
Point 2: The non-transparent process that was used to develop Common Core's standards. The Common Core State Standards Initiative has yet to explain what the qualifications were for membership on the standards-writing committees. The vast majority of the members of the “Standards Development Work Group” work for testing companies. CCSSI has also given no rationale for the people it chose for the three-member teams in charge of the grade-level standards.

The Validation Committee, on which I served, was described as a group of national and international experts who would ensure that Common Core's standards were internationally benchmarked and supported by a body of research evidence. Even though several of us regularly asked to examine this supposed body of evidence, our requests were ignored. After submitting many detailed critiques from October 2009 to May 2010 in a futile effort to remedy the basic deficiencies of Common Core's "college readiness" and grade-level ELA standards, I, along with four other members of the Validation Committee, declined to sign off on the final version. CCSSI has yet to provide evidence that Common Core's high school standards in ELA or mathematics are equal to admission requirements for a wide range of this country's post-secondary institutions.

Point 3: How Common Core's English language arts/reading standards will negatively affect English and reading teachers. Common Core's standards pose many other problems for South Carolina's secondary English teachers. For example:

1. *Common Core expects English teachers to spend over 50 percent of their reading instructional time on nonfiction and informational texts such as seminal U.S. political documents and U.S. Supreme Court decisions.* This is not what English teachers are trained to do in any college English department or teacher preparation program. They take academic coursework in literary study (and in composition and rhetoric) and are trained to teach students how to read literary works (including speeches, biographies, and literary essays), not computer manuals or science textbooks.

2. *Common Core’s ELA standards make it impossible for English teachers to construct a coherent literature curriculum in grades 6-12.* Common Core’s standards not only provide no intellectual base or structure for a curriculum, they actually prevent one from emerging. The academic content of the typical secondary literature curriculum consists of concepts (as well as specific works) that guide literary study (including nonfiction) through the grades (e.g., genres, subgenres, rhetorical and literary techniques and elements, literary periods, literary traditions). But now over 50 percent of the reading curriculum at each grade level must address nonfiction and informational topics. What informational topics can contribute to coherent sequences in secondary English classes when their primary reading content has always been literature? Information about what? Or will test developers select informational texts from science, history/social studies, and mathematics that English teachers have never been expected to teach?

3. *Common Core’s ELA standards will entail drastic costs in order to change academic, preparation, and professional development programs for prospective or current English teachers.* English teachers will need to take a significant amount of academic coursework (or 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 seminal documents they are being required to teach students how to read. They will also have to undergo professional training in reading
scientific and other discipline-based texts. This is an enormous waste of time and money, given the inappropriateness of this charge to English teachers.

4. Common Core's ELA standards badly misinform reading and English teachers on a number of disciplinary matters because Common Core's key ELA standards writers were not trained in English, reading, rhetoric, or composition. Here are two serious examples of disciplinary ignorance:

* Informational reading standards do not distinguish clearly the modes of organizing an expository text (e.g., order of time, cause and effect) from structural elements (e.g., purpose, introduction, body, conclusion).

* The strand on “argument” does not distinguish argument from expression of opinion. Expression of opinion is not a type of writing. Nor does Common Core distinguish academic argument from advocacy or persuasive writing and clarify key concepts at the root of persuasive writing, as every rhetorician knows: purpose and audience.

South Carolina, together with a few other states, should develop a first-class set of content standards in secondary English and reading. A coherent set of first-class standards would enable teachers to guide all students towards a meaningful high school diploma, whether they aim for a career or college.