

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, according to NAEP's state tests of reading in grade 4 and grade 8 in the past decade.

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 has been (or can be) offered to justify them, 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 provides 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 submitted 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 Common Core's 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 curriculum will 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.