

Abandon Common Core?

ACT's many tests provide a new nationwide standard of K-12 excellence

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The once well-intentioned set of standards and assessments for K-12 education, The Common Core State Standards (CCSS) have fallen short of their expectations.

Unwise compromises by these standards' authors and developers have led to academically weak standards that would have been ignored by many states except for the federal government's overwhelming incentives to do otherwise.

As policy makers around the country become aware of these CCSS difficulties, more and more of them are now or soon will be rejecting Common Core for better alternatives- such as the standards and tests offered by the ACT organization.

Preview

The old adage about the road to Hell being paved with "good intentions" may apply here.

Americans want strong academic standards for their schools and many want those standards to be national, but with a caveat: they generally do not want the federal government dictating those terms.

The Common Core State Standards were conceived and advanced by organizations outside of the federal government, namely: *The National Governors Association* and the *Council of Chief State School Officers*. Implicit in the CCSS title, the adjective "State" suggests that these standards could be adopted by states on a voluntary basis.

Along came the US Department of Education, which used its funding under the 2009 "stimulus" Act to provide incentives for states to adopt those standards "or else" lose some of their access to federal funds for education. Some saw the lack of national curricular standards as shameful. Education Secretary Arne Duncan used the pejorative term "insidious" to describe the freedom states have to set their own standards.¹ Many others took a different view and see federal imposition of these standards as illegal. We belong to a middle ground view that seeks good national standards if they are voluntary.

There exists at least one alternative to CCSS that states can implement now that not only has higher academic standards than CCSS but also is relatively immune to federal government interference. That alternative is the ACT organization's standards and batteries of tests that

include the ACT College Test and the ACT Aspire tests, which together cover grades 3 through 12.

Our own work in mapping current state testing regimes' proficiency results to those of the Nation's Report Card (more formally the NAEP) have given us a ring side seat from which we have observed the wide range of academic standards and testing that exist across the United States. Among the mappings we have done, none stands out more than those relating the tests of the ACT organization with those of the NAEP. There is significant agreement between them as to the percentages of students likely to succeed in college. Many educators label the NAEP tests as the *gold standard* of K-12 assessments. The ACT standards and tests are also held in very high regard by professionals in the field. Perhaps we should dub them the *platinum standard* of this field?

The societal consensus about national educational standards is reflected by the federal and state laws concerning education. Americans want seemingly contradictory policies. They want national education standards, but they don't want them imposed by the federal government. Federal law agrees with that sentiment. For example, it limits the role played by the NAEP through prohibitions of local testing and reporting. Unfortunately, the US Department of Education appears to have ignored or worked around federal law when it imposed heavy-handed incentives on the states to encourage adoption of the Common Core proposals.

We think the ACT standards and its testing programs can provide Americans much of what they want. The ACT is a non-profit private organization that is relatively immune to federal pressure and yet it has such well-regarded content standards and testing programs that it can help satisfy the desire to simultaneously have something national, something reputable and something voluntary.

K-12 standards and tests that have been developed by other non-governmental organizations can play similar roles. For example, the non-profit College Board, the for-profit Pearson Education and others are expanding their activities in these areas.

How the Common Core is mathematically weak

The goals of the Common Core standards include the preparation of high school graduates to have the prerequisite knowledge enabling them to enroll in a calculus course when they enter college. The benchmark standards we use for this are the recommendations of the *National Mathematics Advisory Panel* (NMAP)². It was established in 2006 and charged with the task of proposing improvements to K-12 mathematics standards to prepare high school graduates to be ready for "higher levels of mathematics." We find the Common Core standards insufficient to reach these goals. Let's consider some of the gaps and failures responsible for this inadequacy:

- The Common Core postpones proficiency in whole number division from NMAP's grade 5 to grade 6.
- The Common Core postpones teaching the relationships between fractions and decimals from NMAP's grade 5 to grade 7.

- The Common Core postpones the grade level for a first algebra course from NMAP's grade 8 to grade 9.
- The Common Core reduces the number of years of high school math instruction from NMAP's 4 to 3 - a clear indication that students under Common Core will be left behind.
- The Common Core eliminates the traditional teaching of geometry by replacing the usual Euclidean approach recommended by NMAP with an "experimental" method that has had little success. Or as some say, "experiential."

In other words, the Common Core proposes 11 easy years of mathematics instruction that will fall short of the National Mathematics Advisory Panel's recommended 12 years of more intensive work.

How the Common Core affects English Language Arts

A sensible approach to improving student skills in ELA topics would have students read more, write more and gain higher proficiency in grammar, spelling and rhetoric. In contrast the CCSS embark on a path of unproven tradeoffs in which much less effort would be spent in some areas while more would be spent in others. In this connection, a key flaw in Common Core's ELA standards is its shift of reading emphasis from works of fiction, typically the classics of English literature, to works of non-fiction.

It appears that the Common Core reading standards require that approximately half of a student's reading in English classes be non-fiction and the other half fiction. This change from the traditional emphasis on fiction seems to be primarily based on a misunderstanding of NAEP reading tests (which they admire). Those tests focus about 70% of the questions in the non-fiction area and the other 30% on fictional literature. The developers of the Common Core standards for reading make the mistake that tests, such as the NAEP, are measuring reading skills mainly developed in English classes. In reality a student builds reading skills in many other subject areas, including mathematics, science and history. Those other subject areas focus almost entirely on non-fiction. When considered over the many subjects taught in school, the emphasis in the English class needs to be largely on fictional literature if the overall percentage of effort across the school would come out at about 30% for fiction.

If schools attempt to align their English teaching efforts to be only half fiction and half non-fiction, the teachers will need to be retrained to become adequate instructors in the non-fictional areas.³ What will they teach and won't there be temptations to present politically biased information?

If there is any conclusion to draw from what we've learned about Common Core's reading standards, it is that its authors have not based their proposals on sound research. Until there is reliable research suggesting a better approach, we think the best near term idea is to stay with traditional standards while improving their instruction.

Where is the research base for Common Core?

The Common Core State Standards adapted the ACT organization's descriptor, "College and Career Readiness Standards," and apparently did so when ACT was being considered as the assessment provider for the CCSS. Though we are not clear on this, the CCSS organization and its two associated testing consortia are developing tests with other vendors. It seems clear that very few if any longitudinal studies were conducted: There simply has not been sufficient time to accomplish something of that sort.

The research undertaken to support the Common Core State Standards appears, at best, to be incomplete. A number of education experts have been critical of CCSS and their related assessment programs. Christopher Tienken, a Professor at Seton Hall University, has observed the lack of credible research backing up Common Core.⁴

How did we get here? Jamie Gass and James Stergios, of Boston's Pioneer Institute, gave a good review in the *Weekly Standard Blog*.⁵ It is clear that the proponents and implementers of Common Core are supporters of "experiential education" and its motto, "21st century skills." Gass and Stergios remarked about how the states of Connecticut and West Virginia enthusiastically embraced these experiential theories. The result: Most of their NAEP scores fell.

Some other troubling aspects of the Common Core

As we have reviewed the published commentary about Common Core we have encountered some curious information about the Common Core State Standards and the people involved in its development.

In a number of content areas, the CCSS are much less specific than what one would expect. Consider then, these examples:

- CCSS have no standard for cursive writing- effectively making it optional.
- CCSS list relatively few recommended works of fictional literature within its standards, well below their 50% allocation for this type.
- CCSS also has a rather short list of texts that are non-fictional despite their preference for making more "informational" texts available.

One wonders how the authors of the CCSS assessment systems will be able to test against such lack of specificity?

There is concern that states adopting CCSS and their associated assessment systems will expose their students to invasion of privacy that will result from the testing data being inadequately protected when it is used for research and other government purposes. There is concern that each student in participating CCSS states will have a dossier on him or her kept at the US Department of Education.⁶

One of the more bizarre recommendations in the CCSS reading standards is the advocacy of the practice of “cold reading.”⁷ This practice frowns on teachers providing background information about historical texts prior to having the student read them: Thus the student reads it “cold,” as they have recommended in the study of the *Gettysburg Address*. Wouldn’t the additional information help the student become more proficient in the subject content? It baffles us how cold reading could be an improvement. Needless to say, there is no research presented that supports such a practice.

How Common Core has been captured by Washington

We can ask how the development of Common Core State Standards transitioned from a voluntary program into one being imposed by the federal US Department of Education?

This federal governmental interference arose in the implementation of the following programs developed under the Education Department using funds from the so-called Stimulus legislation more formally known as the American Recovery and Reinvestment Act (ARRA):

- The Race to the Top Fund
- The Race to the Top Assessment Program
- The Conditional NCLB Waiver Program

Each of these programs provided funds and/or favors to the states in return for adherence to Education Department priorities. The most prominent of these defacto mandates was the state’s participation in the Common Core State Standards program or possibly in a close facsimile thereof.

Among the criteria for a state to receive a funding grant from *The Race to the Top Fund* was the phrase, “adopting internationally benchmarked standards and assessments that prepare students for success in college and the workplace.”⁸ The Department restricts grant applicants to those that adhere to content standards substantially identical across all states in which a state is allowed to add no more than 15 percent to those common standards.⁹ There is only one available system of standards that has those two characteristics: The Common Core State Standards.

Another bucket of money, \$362 million in funding, was available under the Race to the Top Assessment Program. You guessed it! You could only access grants under this program if the state belonged to one of a few “consortia of states” developing assessments against standards that by the artful phraseology used to describe them could only be the Common Core State Standards¹⁰ or a very close, almost cloned, facsimile.

Many states that did not like the requirements of the No Child Left Behind (NCLB) legislation had another offer put on the table that would give them a waiver from many of the provisions of NCLB on the satisfaction of several conditions, one of which required that the state adopt “college and career ready” standards that are common to a significant number of states.

These three programs put money on the table and offered relief to states willing to play the Common Core game. Were these innocent incentives encouraging the states to have exemplary educational policies? Or were they coercive measures designed to induce adherence to the Common Core State Standards? It is difficult to refute the latter.

What laws were broken?

Not being a legal expert, I can only surmise that laws were broken based on my reading of the federal statutes. A number of federal laws limit the activities of the federal government from interference in the curricula used within the various states and localities:

- The *General Education Provisions Act*, for example, prohibits federal government control of curricula used by “any educational institution.”¹¹
- The *Department of Education Organization Act* denies any officer of the Department from the “exercise and direction, supervision, or control over the curriculum” of “any educational institution, school, ...” unless a specific federal law authorizes it.¹²
- The *Elementary and Secondary Education Act of 1965* also limits federal control over curriculum in schools.¹³

The “incentive” programs discussed in the preceding section do not literally *control curriculum* but they erect barriers and incentives of such magnitude that non-compliant states will suffer financially and programmatically. The “compliance” being sought here is participation in Common Core State Standards. To participate a state is required to pledge adherence in a number of areas, inferentially including curricula.

Some states, such as Texas, reviewed the legal issues surrounding CCSS and decided to decline the inducements. As Governor Rick Perry wrote in his letter to Secretary Duncan declining the offers,¹⁴

“In the interest of preserving our state sovereignty over matters concerning education and shielding local schools from unwarranted federal intrusion into local district decision-making, Texas will not be submitting an application....”

The Texans did their homework. Most other states did not, or if they did, they probably allowed pecuniary considerations to cloud their judgment.

For those states that do adopt the Common Core State Standards, Sandra Stotsky and Ze’ev Wurman have proposed a kind of *truth in advertising* requirement that such states should remove the label of “college and career readiness” everywhere it appears in their descriptions of the standards.¹⁵

ACT to the rescue

Many of the promises of the Common Core State Standards, including that they are voluntary, have been broken. Among those using the CCSS there are many who are unaware that their efforts are having the effect of subverting the traditional standards of American K-12 education.

Many naively believe they are replacing worse standards with better ones. A closer look shows degradation masquerading as reform.

Those of us who have studied student proficiency of K-12 public school students have not observed any pervasive dysfunction of the traditional curricula being used. Rather we find that students have not learned the content intended for them. Our solution to that involves better testing, better instruction and better student incentives- not wholesale changes to the curricular content.

Many educators and other stakeholders of American K-12 education recognize the standards used in the Nation's Report Card- the NAEP- as being substantial and rigorous. States might consider them as they develop their own content standards. But the NAEP's limited use and the terms of the legislation establishing it prevent it from being used locally. For it to do otherwise might be interpreted as specifying an unwanted national curriculum.

Happily, there is a private well-respected alternative set of standards and tests that don't require a federally imposed curriculum and testing. We can propose that states, local educators, private schools, homeschools, tutors and anyone else interested in the academic performance level of students in K-12 education can use the ACT organization's standards and tests.

Here at Asora Education we have recently done comparisons of some of the ACT tests with those of the NAEP. At the 8th, 10th and 12th grade levels we find that the principal NAEP figure of merit, the *proficiency percentage*, is numerically close to ACT's figure of merit, the *percent on track* to be college and career ready. A companion report elaborates on this.¹⁶

A fairly substantial number of states are already using ACT tests as their primary assessment mechanism and would find it rather easy to abandon any commitment made to the Common Core. ACT content standards are more traditional, more research based and more supportive of college readiness than those of the Common Core, which have not been validated by much significant peer reviewed research.

Let us reiterate that the Common Core State Standards, which some educators hoped would replace the earlier "dysfunctional" state testing systems with something more rigorous, are not only incomplete, they are eroding the traditional American K-12 content standards.

For some time we suspended our judgment concerning Common Core, but now have concluded that it is a failed system- both legally and academically.

By using the tests and content standards of the ACT organization, there are a number of benefits to students, parents, educators and others. They include:

1. The various tests of the ACT are research based and measure the likelihood that a high school graduate will succeed in college. In the nomenclature of the tests of the ACT, a student is On Track to be "college ready" if that student performs above specified cut scores on the tests. For each participating school the ACT or the states usually report how many students in each tested group or sub-group were college ready or who were On Track to being college ready.

2. In many subject areas, particularly mathematics and reading, the criteria for being On Track are similar to NAEP's criteria for being Proficient. We already noted that if the NAEP can call itself the "gold standard" in K-12 testing, then perhaps the ACT testing systems could have the label "platinum standard?"
3. Citizens worried about federal government overreach should not be as concerned about local public schools using the ACT testing programs because they are not controlled by Washington and are relatively immune to federal government interference. That kind of concern about overt federal control of education has placed limits on the NAEP itself; the NAEP is prohibited from local testing and is limited to using sampling methods to generate the statewide results it publishes. So if you're concerned about the 10th Amendment of the Constitution, the ACT is "your test."
4. There is an irony in all this. Consider that it was well meaning policy makers and governors at the state level who were the first ones to propose and participate in the development of the Common Core. The idea of having national standards in K-12 education, though controversial in some circles, could be implemented without federal control and could be optional. Some states might want to augment the standards, while others might want to remove provisions they find objectionable. The ACT organization was a model for the developers of the Common Core, but those in control of the Common Core put restrictions in their standards that were contrary to the ACT's own standards. Math and reading were both dumbed down. A ridiculous restriction on a state augmenting the Common Core standards limited those improvements with the requirement that the Common Core be at least 85% of their expanded requirements.
5. The ACT organization is rapidly expanding its K-12 testing programs to include all grade levels from 3rd to 12th. States that want to get away from the troubles of Common Core can easily do so.

Given those considerations, we at Asora decided to turn our focus from making NAEP proficiency estimates at the local level to making ACT Percent on Track estimates for schools and districts (including private schools) that do not yet participate in ACT testing.

Conclusion: Abandon The Common Core

The Common Core State Standards that were well intentioned at their conception have been derailed by unwise and possibly illegal tactics.

- Unwise, in the sense that the reading and mathematics standards are significantly weaker than what many states had previously used.
- Illegal, in the sense that the US Department of Education has apparently violated several different Sections of the federal law in their effort to impose their "politically correct" curriculum nationally.

Luckily, there is a replacement already in operation: The ACT organization has the standards and tests needed. It has the experience and has validated its programs through careful research.

Go there!

¹ Arne Duncan, *Beyond the Bubble Tests: The Next Generation of Assessments*, -- Secretary Arne Duncan's Remarks to State Leaders at Achieve's American Diploma Project Leadership Team Meeting, September 2, 2010. Access its text at: <http://www.ed.gov/news/speeches/beyond-bubble-tests-next-generation-assessments-secretary-arne-duncans-remarks-state-l>.

² R. James Milgram and Sandra Stotsky, *Lowering the Bar: How Common Core Math Fails to Prepare High School Students for STEM*, A Pioneer Institute White Paper, #103, September 2013, p 7, access it at: <http://pioneerinstitute.org/download/lowering-the-bar-how-common-core-math-fails-to-prepare-high-school-students-for-stem/>.

³ Mark Bauerlein and Sandra Stotsky, *How Common Core's ELA Standards Place College Readiness at Risk*, A Pioneer Institute White Paper, #89, September 2012, p 2, access it at: <http://pioneerinstitute.org/download/how-common-cores-ela-standards-place-college-readiness-at-risk/>.

⁴ Christopher H. Tienken, *The Common Core State Standards: The Emperor Is Still Looking For His Clothes*, Kappa Delta Pi Record, 48, p 152, 2012. Access it at: http://christienken.com/wp-content/uploads/2013/01/CCSS_Emperor_Still_Naked.pdf.

⁵ Jamie Gass and Jim Stergios, *The Beginning of Common Core's Trouble*, The Weekly Standard, May 29, 2013. http://www.weeklystandard.com/print/blogs/beginning-common-cores-trouble_731923.html?page=1.

⁶ Emmett McGroarty, Joy Pullmann, and Jane Robbins, *Cogs in the Machine: Big Data, Common Core, and National Testing*, A Pioneer Institute White Paper, #114, May, 2014, p52, access it at: <http://pioneerinstitute.org/download/cogs-in-the-machine-big-data-common-core-and-national-testing/>.

⁷ Valerie Strauss, *Common Core's odd approach to teaching Gettysburg Address*, in Washington Post Blogs, November 19, 2013, <http://www.washingtonpost.com/blogs/answer-sheet/wp/2013/11/19/common-cores-odd-approach-to-teaching-gettysburg-address/>.

⁸ Robert S. Eitel and Kent D. Talbert, *The Road to a National Curriculum: The Legal Aspects of the Common Core Standards, Race to the Top, and Conditional Waivers*, A Pioneer Institute White Paper, #81, February 2012, p8, access it at: <http://pioneerinstitute.org/download/the-road-to-a-national-curriculum/>

⁹ Robert Scott, *A Republic of Republics: How Common Core Undermines State and Local Autonomy over K-12 Education*, A Pioneer Institute White Paper, #102, September 2013, p8, access it at: <http://pioneerinstitute.org/download/a-republic-of-republics-how-common-core-undermines-state-and-local-autonomy-over-k-12-education/>.

¹⁰ *Op Cit*, Eitel et al, p 11.

¹¹ 20 U.S.C. § 1232a (Title 20 of the United States Code, Section 1232a)

¹² 20 U.S.C. § 3403b

¹³ 20 U.S.C. § 7907a

¹⁴ *Op Cit*, Robert Scott, p 9. Mr. Scott served as Texas Commissioner of Education, 2007 – 2012.

¹⁵ Sandra Stotsky and Ze'ev Wurman, *Common Core's Standards Still Don't Make the Grade: Why Massachusetts and California Must Regain Control Over Their Academic Destinies*, A Pioneer Institute White Paper, #65, July 2010, p 27, access it at: <http://pioneerinstitute.org/download/common-cores-standards-still-dont-make-the-grade/>.

¹⁶ David V. Anderson, *Mapping NAEP Proficiencies to ACT's POT*, Asora Education Enterprises Report, June 9, 2014, (until finalized into downloadable form, draft copies can be requested from info@asoraeducation.com)