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**BOARD OF
EDUCATION**

**Public Comment from the New Paltz Central School District Board of Education regarding the
New York State Education Department's draft New York State P-12 English Language Arts
and Mathematics Learning Standards**

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The New Paltz Board of Education urges the Board of Regents to reject the draft New York State P-12 English Language Arts and Mathematics Learning Standards put forth by the NYS Department of Education.

We reject the draft learning standards for the following reasons:

1. While these revisions have been called substantive¹ and a "total reboot"² of the Common Core Learning Standards, the draft standards reflect a rigid adherence to the original Common Core anchor standards. Of the 34 ELA anchor standards, 32 are word-for-word identical when compared to the original anchor standard. Of the two changes, one standard is deleted³ and the other change is a minor edit of the text with no change to the substance of the standard.⁴ None of the eight Standards for Mathematical Practice have been changed.

2. A detailed examination⁵ of draft Grade 2 ELA standards provides further evidence that changes to the learning standards are merely cosmetic. The 75 draft Grade 2 ELA learning standards can be classified as follows:

- a. 24 standards (32%) are unchanged.
- b. 37 standards (49%) are minor text edits with no change to the substance of the standard.⁶
- c. 1 standard (1%) was moved or replicated from Grade 4.⁷
- d. 4 standards (5%) were moved or replicated from Grade 3.⁸
- e. 1 standard (1%) was moved or replicated from Grade 1.⁹
- f. 3 standards (4%) are not standards (e.g. "Not applicable to this grade.").
- g. 3 standards (4%) are simple mergers of 2 old standards.¹⁰
- h. 1 standard (1%) was moved to into the guidance area of the standards.
- i. 1 standard (1%) is a fragment of the old standard.¹¹

In the draft standards document¹² from NYSED, 27 of the 75 standards are noted as "new recommend standards" and Commissioner Elia claimed, "It isn't just tinkering around the edges and doing small, little things".¹ We reject the claims that these standards are new and that the changes are substantial.

3. The draft revisions do not reflect the concerns of parents and educators as depicted in Governor Cuomo's Common Core Task Force Report.¹³ For example, The Common Core Task Force clearly outlined the concerns of early childhood experts regarding the developmentally inappropriate expectation that all kindergarteners "*read emergent texts with purpose and understanding*", yet this standard remains unchanged in the draft revisions. Out of close to fifty revisions to the kindergarten ELA standards, only three of these revisions reflect content changes. This lack of meaningful revision can be observed across all grade level standards in both ELA and math and is incompatible with the New Paltz Central School District's mission, vision, and guiding principles.¹⁴

4. NYSED may see some justification for the minimally-revised standards in the results of the AIMHighNY survey, as evidenced in this quote from Commissioner MaryEllen Elia: "The preliminary data from AIMHighNY show there is strong support for higher learning standards for New York's students".¹⁵ The role of that survey is further evident in this quote from the Commissioner: "Their [survey respondents] input will help us to identify which standards should be rewritten, moved, or scrapped all together [*sic*]."¹⁵ However, we feel that the survey was methodologically flawed. Support for our assertion:

- a. The survey did not use proper sampling techniques to gain a representative sample of relevant stakeholders. It was simply open to anyone willing to take the survey. Only 72% of responses came from NY residents associated with public schools.¹⁶ There is also evidence of skew within regions. Of all NYS public school teacher respondents, NYC represents 7.4% of respondents even though they make up 29% of the actual educator population.^{16,17} Long Island teachers represent 24.8% of respondents but only make up 18% of the actual population.^{16,17}
- b. The scope of the survey is being exaggerated. A December, 2015 NYSED memo regarding the survey claimed, "More than 10,500 respondents provided feedback on one or more of the State's current learning standards. In total, survey participants submitted 246,771 pieces of feedback."¹⁵ A September, 2016 NYSED memo regarding the

draft standards inflates that claim: “More than 10,500 people responded to the survey and provided over 750,000 pieces of feedback.”¹⁸ The 6,611 NYS public school teacher respondents represent less than 3% of all NYS public school teachers.^{16,19}

- c. The survey has been used to justify overall support for the standards, but the survey itself never assessed that broad question. The survey’s construction was very narrow and never asked the respondent to address questions concerning broad support for the standards or support for other policy issues linked to the standards, such as state assessments and APPR.¹⁶
- d. The survey results contain numerous data quality issues. For example, at least 68 individuals were able to respond more than once, each time under a separate ID (hence counted as multiple “people”).¹⁶ There is also evidence of “speeding”, i.e. answering questions far too quickly than would be possible if the question was properly considered. For example, one respondent submitted 45 responses in 123 seconds (less than 3 seconds per response) while another submitted 190 responses in just over 20 minutes (less than 7 seconds per response).¹⁶ There are over 100 respondents that submitted 10 or more responses at an average of less than 10 seconds per response.¹⁶ Such abnormalities (evidence of “satisficing”²⁰) would be considered for mitigation in a sufficiently rigorous survey.
- e. While the overall approval rate of 71% seems quite positive, the reported results ignore an evident disconnect with a very important segment: parents and guardians. Parent/Guardian, the second largest respondent group, approve of only 51% of the standards they reviewed.

The New Paltz Board of Education has advocated for the development of learning standards based in evidence or research, created with input from educators, early childhood experts, and parents. To date, insufficient educator and parent input has been used to support the State’s original adoption of the Common Core Learning Standards. Therefore, we cannot recommend the adoption of revised standards that provide almost no deviation from the original CCLS and do little to address the concerns of parents and educators.

The New Paltz Central School District Board of Education does not have confidence in the revision process or results. We urge the Board of Regents to reject the draft standards, investigate the procedure by which these revisions were reached, and convene public hearings on the adoption of the draft standards before taking any further action.

Approved by the New Paltz Central School District Board of Education November 2, 2016.

References and Notes:

1. <http://www.chalkbeat.org/posts/ny/2016/09/21/new-york-state-recommends-changes-to-over-half-the-common-core-learning-standards/#.WBIAVi0rKM8>
2. albany/story/2015/09/new-task-force-familiar-faces-cuomo-wants-common-core-total-reboot-026092
3. The deleted standard was Writing Standard #10: “Read and comprehend complex literary and informational texts independently and proficiently.” The deletion was accompanied by this note: “The ELA Committee decided that this standard would be more appropriate as guidance for instruction instead of a student achievement expectation. The committee would like to see text complexity guidance included in an introduction.”
4. The edited standard is Writing standard #5. Old: “Conduct short as well as more sustained research projects based on focused questions, demonstrating understanding of the subject under investigation.” New: “Conduct research based on focused questions, demonstrating understanding of the subject under investigation”.
5. <https://goo.gl/FLjG47>
6. Example:
 - a. New: “Answer and ask such questions as who, what, where, when, why, how, and other questions to demonstrate an understanding of key ideas and details in a text.” (2.R.1)
 - b. Old: “Ask and answer such questions as who, what, where, when, why, and how to demonstrate understanding of key details in a text.” (RI.2.1)
7. Example:
 - a. New: “Use precise language and domain- specific vocabulary to inform about or explain the topic.” (2.W.1.b)
 - b. Old: “Use precise language and domain-specific vocabulary to inform about or explain the topic.” (W.4.2.d)
8. Example:
 - a. New: “Use linking words and phrases to connect ideas within categories of information.” (2.W.1.c)
 - b. Old: “Use linking words and phrases (e.g., also, another, and, more, but) to connect ideas within categories of information.” (W.3.1.c)

9. Example:

- a. New: “Create and present a poem, narrative, play, art work, or personal response to a particular author or theme studied in class, with guidance and support as needed.” (2.W.11)
- b. Old: “Create and present a poem, dramatization, art work, or personal response to a particular author or theme studied in class, with support as needed.” (W.1.11)

10. Example:

- a. New: “Describe how characters in a story respond to major events and challenges. Describe the connections between ideas, concepts, or a series of events in an informational text.” (2.R.3)
- b. Old: “Describe how characters in a story respond to major events and challenges.” (RL.2.3) and “Describe the connection between a series of historical events, scientific ideas or concepts, or steps in technical procedures in a text.” (RI.2.3)

11. Example:

- a. New: “Provide a conclusion.” (2.W.1.e)
- b. Old: “Write opinion pieces in which they introduce the topic or book they are writing about, state an opinion, supply reasons that support the opinion, use linking words (e.g., because, and, also) to connect opinion and reasons, and provide a concluding statement or section.” (W.2.1)

12. <http://www.politico.com/states/new-york/http://www.nysed.gov/common/nysed/files/ela-draft-standards-grade-2.pdf>

13. <http://on.ny.gov/1QyVram>

14. http://www.newpaltz.k12.ny.us/cms/lib/NY01000611/Centricity/shared/districtwidedocuments/2015-2016schoolyear/NP_Standards.pdf

15. <http://www.nysed.gov/news/2015/state-education-department-releases-preliminary-data-aimhighny>

16. Raw survey data were obtained on December 15, 2015 via FOIA request.

17. <http://www.p12.nysed.gov/irs/pmf/>

18. <http://www.nysed.gov/news/2016/state-education-department-releases-new-draft-nys-english-and-mathematics-learning>

19. https://nces.ed.gov/surveys/sass/tables/sass1112_2013314_t1s_001.asp

20. <https://pprg.stanford.edu/wp-content/uploads/2000-The-threat-of-satisficing-in-surveys-The-shortcuts-responds.pdf>