

Initial comments on CCSSO/NGA's March 2010 public comment draft for ELA  
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**1. No research base supporting the empty 10 College- and Career-Readiness Standards for Reading on K-12 grade-level standards (see p. 6 and p. 31 of the main document).**

There is no evidence to support these generic, content- and culture-free skills as the basis for grade 10 common tests (possibly for a "grade 10 diploma") and as the goal of grade-level standards. David Conley's report *Understanding University Success* (2003), which strongly influenced the notion of "college readiness standards," describes the content standards needed for matriculation into college. The report includes standards for English, including standard D, presented below. But D is not included as a CCSSI college- and career-readiness standard, and its subsidiary objectives do not appear in CCSSI's grade level standards.

*"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."

**2. Emphasis on the use of a confusing "complexity" formula for English teachers to use to determine the complexity of the literature they teach**

Do the nation's English teachers need a "complexity" formula to judge the complexity of a literary text? No "complexity" formula can tell an English teacher a text's literary context and literary history--what links it to earlier and contemporary texts. We all know why complexity matters (which is all CCSSI harps on). CCSSI's explanation (in Appendix A) diagnoses the problem correctly; textbooks have been continuously dumbed down for decades. But the solution is not to ask 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 formula can.

The problem lies with the advice of reading researchers, supported by reader/writer workshop educators, who advised teachers and publishers many years ago that narrative texts were easier than expository texts, would engage struggling readers better, and would teach them what they couldn't learn from expository texts. After publishers and teachers followed their advice, struggling readers still didn't read better. Worse yet, all the other kids had also been dumbed down because of self-esteem-related mandates to prevent faster learners (including faster-learning minority students) from being placed in faster-moving classes or groups. Now reading researchers say that kids can't read complex texts by grade 12 because their textbooks declined in difficulty and teachers don't know how to judge complexity.

Reading researchers are now recommending a huge dose of expository reading for all students at every grade, with texts to be determined by a new formula that is as confusing as it is insulting to the nation's teachers. What remains unsolved--the original problem way back in the 1950s and 1960s--is how to get kids who didn't like to read or who didn't learn how to read very quickly to learn how to read "complex" texts. Nothing in these standards addresses the basic issue. We've simply come full circle on what might be in the curriculum except that a formula can't tell a poorly trained 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 links to what will help them understand the text.

The formula developed by a University of Memphis group is unusable by the average teacher and won't be used by the able teacher. It has five dimensions, with percentiles spread from 0% to 100%. But, get

this! 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. Eventually, their chart (p.10) makes sense but not at first blush because the reading researchers did not use category names with parallel neutral values.

Moreover, as if to deliberately confound teachers, an application of the formula to *The Grapes of Wrath* shows it at the grades 2-3 level in complexity, although CCSSI correctly notes that "qualitative measures" (i.e., professional judgment) place it appropriately at the high school level.

### **3. Misunderstanding and misuse of NAEP percentages to justify altering what English teachers teach and what is assessed on an ELA test for which English teachers will be held accountable.**

The introduction to the K-12 standards justifies the 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 (and the reading researchers advising CCSSO know this) 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, 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).

Despite the limitations of the NAEP percentages for guiding the allotment of time for literary study in the high school curriculum, CCSSI has chosen to use the 70 percent figure for passage selection on the NAEP reading *assessments* to justify their own emphasis on the reading of informational texts in the high school English *curriculum*, to the detriment of reading fiction, poetry, and drama. The purpose is, apparently, not only to alter English teachers' priorities in their own classes but also to ensure this emphasis in the national tests to be developed (based on the national standards that the U.S. Department of Education may require states to adopt as a condition of further Title I money under the No Child Left Behind Act) for which English teachers will likely be held fully accountable.

### **4. No international benchmarking**

See 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 White Paper "Why Race to the Middle?" by Ze'ev Wurman and Sandra Stotsky (February 2009)

### **5. Few content-rich Literature and Reading standards in grades 6-12. Here they are:**

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.

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.)

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.

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).

### **6. 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 frameworks was the spelling out of the different categories of words/concepts that teachers could explicitly teach through the grades, especially in high school.

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/learning of dictionary skills. 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, never mind students, can interpret this "standard.")

"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.

Were these vocabulary "standards" approved by the eminent vocabulary experts listed by CCSSI as reviewers or consultants? 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 technical vocabulary should be looked up in a glossary because they usually cannot be determined contextually.