

Dear Republican Leaders

The email of July 22nd by John Thrasher merits a strong response. As people across the United States learn the innumerable problems with the Common Core system of national standards, tests, and data mining and rise up in horror to oppose their imposition on our innocent children, the proponents continue to recycle the same tired arguments. They continue to claim that opponents of this program are “misinformed” and laboring under “conspiracy theories.”

Please hear us loud and clear: We are not misinformed. We do know exactly what this is. We do not want it for our children, our party and our nation. We believe that it is they that are misinformed. The following are the responses to their arguments:

International Competitiveness: 1) There is no evidence that national standards improve academic achievement. The United States does both better and worse than countries that have national standards¹; 2) Repeated requests for evidence of international benchmarking by the Common Core validation committee were denied causing five academicians to refuse to sign off on the final version²; 3) It takes far more than rankings on international tests to make a nation internationally competitive³; and 4) The math standards are judged to be so academically inferior that American students will be two years behind their international peers by the end of eighth grade and farther behind by the end of high school.⁴

Federal Mandate: Many conservative groups and elected leaders are concerned about federal overreach related to the Common Core standards system. These include the unanimous vote of the Republican National Committee⁵ that includes Florida’s highly respected members, the National Federation of Republican Women, many groups across Florida and the nation and the elected legislatures and governors of four states that voted or took executive action against the standards. These groups represent hundreds of thousands, if not millions of people across the nation, not just a few individual governors. In addition numerous REC’s across the state have passed resolutions opposing Common Core.

Now the U.S. House Republicans also apparently didn’t get the memo that this initiative is not supposed to be taken as the massive federal interference in education that it is. On July 18th, 231 out of 234 House Republicans voted for an amendment to the ESEA reauthorization bill expressing the sense of Congress that, “States and local educational agencies should maintain the rights and responsibilities of determining

¹Neil McCluskey - Behind the Curtain: Assessing the Case for National Curriculum Standards – Cato Institute 2/17/10 <http://www.cato.org/publications/policy-analysis/behind-curtain-assessing-case-national-curriculum-standards>

²Sandra Stotsky - Invited Testimony on the Low Quality of the Common Core Standards. Testimony Submitted to Colorado’s State Board of Education, 12/6/12 http://www.uaedreform.org/wp-content/uploads/2000/01/Stotsky_Testimony_for_Colorado.pdf

³Christopher Tienken, Editor of the American Association of School Administrators Journal of Scholarship and Practice - Common Core State Standards: An Example of Data-less Decision Making - Winter 2011, Volume 7, No. 4, pp. 3-18 at <http://mathforum.org/kb/servlet/JiveServlet/download/323-2289422-7524512-690019/att1.html>

⁴James Milgram – Testimony to the Indiana Senate Education Committee – 1/23/12 <http://hoosiersagainstcommoncore.com/james-milgram-testimony-to-the-indiana-senate-committee/>

⁵Republican National Committee – Resolution Concerning Common Core Education Standards - Spring 2013 meeting, http://www.gop.com/wp-content/uploads/2013/04/2013_Spring-Meeting_Resolutions.pdf, p. 5

educational curriculum, programs of instruction, and assessments for elementary and secondary education.”⁶

One of Florida’s own Congressman Trey Radel said on the House floor, “The Department of Education heavily incentivized and pressured states into adopting the Common Core State Standards Initiatives. These national standards and assessments ultimately determine the curriculum and teaching materials used in classrooms across the nation.”⁷ Other Florida Congressmen have signed letters opposing Common Core, including Rich Nugent, Ted Yoho, as well as Trey Radel along with other members of congress. Our very own US senator Marco Rubio has also come out in opposition to Common Core Standards.

In that same bill, the House passed language limiting the federal Department of Education from “either directly or indirectly, attempt to influence, incentivize, or coerce State adoption of the Common Core State Standards...or any other standards...or assessments tied to such standards.”⁸ Are they really trying to say that nearly the entire U.S. Republican House delegation including John Boehner, the Speaker, and John Kline, the chairman of the US House Education and Workforce Committee, are “misinformed?”

Data Privacy: Unfortunately, they are again misstating what opponents are saying. No one has “alleged that the new standards change laws around student data and privacy.” Rather, the federal government, via regulation, has weakened the Family Education Rights and Privacy Act (FERPA)⁹ that is supposed to protect student data privacy at the same time that it is requiring via the American Recovery and Reinvestment Act (Stimulus), the Race to the Top grant program (that required Common Core), and No Child Left Behind waivers (that also required Common Core), that states have interoperable, longitudinal student databases. These databases share individual level student data with other states, multiple agencies of the federal government, and researchers and corporations. It is beyond dispute that National Center for Education Statistics (NCES) Student Data Handbook contains hundreds of data points, many that are non-academic, on individual students and families.¹⁰ The Code of Federal Regulations for FERPA is completely clear that this data may be shared without parental consent¹¹ and that biometric data like

⁶[H.AMDT.321](#) Amendment (A004) offered by Mr. Luetkemeyer. (consideration: CR [H4694-4696](#), [H4713-4714](#); text: CR [H4694](#)) An amendment numbered 4 printed in House Report 113-158 to express the sense of the Congress that States and local education agencies should maintain the rights and responsibilities of determining curriculum and assessments for elementary and secondary education.

⁷ Rep. Trey Radel - Congressional Record – 7/18/13

<http://www.gpo.gov/fdsys/search/citation.result.CREC.action?congressionalRecord.volume=159&congressionalRecord.pagePrefix=E&congressionalRecord.pageNumber=1098&publication=CREC>

⁸ HR 5, The Student Success Act – Reported version, <http://www.gpo.gov/fdsys/pkg/BILLS-113hr5rh/pdf/BILLS-113hr5rh.pdf>, p. 49, lines 18-25

⁹ Electronic Privacy Information Center (EPIC) - EPIC to Defend Student Privacy Rights in Federal Court - <http://epic.org/2013/07/epic-to-defend-student-privacy.html>

¹⁰ See the NCES Student Data Handbook table of contents for students and teachers here:

<http://nces.ed.gov/programs/handbook/toc.asp>

¹¹ Title 34: Education PART 99—FAMILY EDUCATIONAL RIGHTS AND PRIVACY – § 99.30 Under what conditions is prior consent required to disclose information? <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=11975031b82001bed902b3e73f33e604&rgn=div5&view=text&node=34:1.1.1.33&idno=34#34:1.1.1.33.4.132.1> as cited by Dr. Karen Effrem - Issues with Florida SB 878 – Common Core Linked Data Warehouse Bill – Education Liberty Watch 3/26/13 <http://edlibertywatch.org/2013/03/issues-with-florida-sb-878-common-core-linked-data-warehouse-bill/>

genetic information and iris scans may be included in student data collection.¹² These multiple federal programs and regulations absolutely require data collection from P-20W, meaning from birth through the workforce, with evidence clearly available in Florida's Race to the Top application.¹³ There was also language in SB 878, the data warehouse bill that connected individual student data to the NCES data elements, planned making data available to corporations and researchers, and linked data from K-12 through college and the workforce.¹⁴ After enormous public outrage, that bill was wisely allowed to die by legislative leadership despite passing both chambers unanimously except for the difference of a small amendment between the two versions.¹⁵ That bill was authored and heavily promoted by the Foundation for Florida's Future.

Another document from the US Department of Education unambiguously recommends that the new federally funded and supervised national tests for the "new standards," i.e. Common Core, should be testing for non-academic psychological parameters¹⁶, including with cameras, posture seats, and skin conductance bracelets, effectively turning our children into lab rats.¹⁷ This psychological profiling data will then be included in the students' womb to tomb dossier, all of which makes the NSA and IRS scandals pale in comparison. Workshop topics at the recently concluded NCES data conference included one on monitoring behavioral data¹⁸ and many on preschool through workforce data collection¹⁹, with one even mentioning combining the genetic data of the newborn screening program in Rhode Island with

¹² **"Biometric record," as used in the definition of 'personally identifiable information,' means a record of one or more measurable biological or behavioral characteristics that can be used for automated recognition of an individual. Examples include fingerprints; retina and iris patterns; voiceprints; DNA sequence; facial characteristics; and handwriting."** - Code of Federal Regulations (CFR) 99.3 <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=11975031b82001bed902b3e73f33e604&rgn=div5&view=text&node=34%3A1.1.1.1.33&idno=34#34:1.1.1.1.33.4.132.1> as also cited in Effrem, op. cit.

¹³ Florida's Race to the Top Application says, "The Governor or his/her authorized representative assures that the State will comply with all of the accountability, transparency, and reporting requirements that apply to the Race to the Top program, including the following: For each year of the program, the State will submit a report to the Secretary, at such time and in such manner as the Secretary may require, that describes the State's progress in reducing inequities in the distribution of highly qualified teachers, implementing a State **longitudinal data system**, and developing and implementing valid and reliable assessment..." <http://www.fldoe.org/arra/pdf/topapp.pdf>

¹⁴ See analysis by Effrem on SB 878, cited in footnote 11.

¹⁵ Education Liberty Watch - Activists & Education Liberty Watch Combine to Stop Florida Data Mining Bill - <http://edlibertywatch.org/2013/05/activists-education-liberty-watch-combine-to-stop-florida-data-mining-bill>

¹⁶ National Research Council 2012 Report on 21st Century Knowledge and Skills (NRC, 2012) as quoted in Nicole Shechtman – Promoting Grit, Tenacity, and Perseverance: Critical Factors for Success in the 21st Century – U.S. Department of Education, Office of Educational Technology, Draft, February 2013, <http://www.ed.gov/edblogs/technology/files/2013/02/OET-Draft-Grit-Report-2-17-13.pdf>, p. 49 of pdf also cited by Effrem

¹⁷ Grit, Tenacity, and Perseverance report as cited in Footnote 18 and included with legislative correspondence from Dr. Effrem available at <http://edlibertywatch.org/2013/04/more-interaction-on-florida-common-core-data-mining-bill/>

¹⁸ NCES STATS DC 2013 National Data Conference Concurrent Session V-J – Developing a Behavior Dashboard for Schools - <http://nces.ed.gov/whatsnew/conferences/PDF/STATSDC2013Agenda.pdf> p. 9

¹⁹ NCES STATS DC 2013 National Data Conference Concurrent Session VI-D - P-20W Data Standards for More Successful Student Transitions and Life-Long Learning <http://nces.ed.gov/whatsnew/conferences/PDF/STATSDC2013Agenda.pdf> p. 8

preschool and K-12 data²⁰. It is also abundantly clear from both the NCES and the National Data Quality Campaign²¹ that using student data is a higher priority to these entities than individual student privacy.

Local Control of Curriculum: While there may be local control and flexibility regarding curriculum in theory, the truth is that the federally funded and supervised national tests that accompany the standards are so high stakes, they will drive curriculum. These high stakes include district funding, teacher pay and tenure, and student advancement. Therefore, it is far more likely that teachers and districts will have to choose something much closer to the federal model curriculum that goes with these national tests in order to maintain funding, jobs, etc. In essence, it will be the same problems with the FCATs on steroids.

Effect on School Choice: While the Common Core standards and tests are not currently required for private and home schools, these facts are also abundantly clear: 1) The GED and college entrance exams are being aligned to the Common Core; 2) Popular private and home school texts are being aligned to Common Core 2) Governor Scott and Commissioner Bennett have publicly stated that they want voucher students that attend private schools to take the state Common Core tests, essentially imposing the Common Core on private schools²²; and 4) The Home School Legal Defense Association calls the Common Core standards “too much like a national curriculum.”²³ There may not be very much more time for private and home schooled students to avoid these standards

Likely Effects of Common Core: You say in your letter that you believe that “these new standards ensure we provide our kids with a better education and the taxpayers with a better return on their investment” and that “students graduate high school more prepared for college and the workforce.” Yet, there is no field or baseline data showing this as required by the education funding bill, SB 1076²⁴. The Thomas B Fordham Institute, often cited by proponents, concedes that Florida’s standards are already near or above the same levels of rigor as the Common Core²⁵. This begs the question as to why the State of Florida must put its education system through such costly, wrenching changes to obtain essentially the same level of rigor, especially when the current standards result in more than seventy percent of Florida high school graduates needing remediation in college.

²⁰ Ibid with personal report from Dr. Effrem who attended this conference and session. In addition, there is evidence from Rhode Island’s Race to the Top Early Learning Challenge application that Rhode Island’s proposed early learning data system will be linked to both the state’s K-12 data system and to the state’s universal newborn screening and health data system...” as discussed in Education Liberty Watch’s report - Government Preschool Tyranny – “You Ain’t Seen Nothing Yet!” Education Liberty Watch 2/24/12

<http://edlibertywatch.org/2012/02/government-preschool-tyranny-you-aint-seen-nothing-yet/>

²¹ For instance, the National Data Quality Campaign says on their website: “While state policymakers bear the responsibility for protecting student privacy, they need not do so at the sake of restricting the use of quality, longitudinal education data in support of their ultimate goal: improving student achievement.

<http://www.dataqualitycampaign.org/find-resources/complying-with-ferpa-and-other-federal-privacy-and-security-laws-and-maximizing-appropriate-data-use/>

²² Tia Mitchell – Governor Rick Scott Advocates Testing Voucher Students at Private Schools – Tampa Bay Tribune, 12/13/12 <http://www.tampabay.com/blogs/the-buzz-florida-politics/content/gov-rick-scott-advocates-testing-voucher-students-private-schools/2101331>

²³ William Estrada – Common Core State Standards Initiative: Too Close to a National Curriculum – HSLDA, 12/17/12 <http://www.hsllda.org/docs/news/2012/201212170.asp>

²⁴ Chapter No. 2013-27, (See enrolled version of SB 1076), lines 2057-2065 <http://flsenate.gov/Session/Bill/2013/1076/BillText/er/HTML>

²⁵ See Sheila Carmichael, et al - The State of State Standards—and the Common Core—in 2010 – Thomas B. Fordham Institute 7/21/10 Florida page

http://edexcellencemedia.net/publications/2010/201007_state_education_standards_common_standards/Florida.pdf

Character Assassination: It is proponents of Common Core who have engaged in impugning the character and mental stability of opponents. State Board of Education Member John Colon called those that raised concerns about Common Core “whackos” and “crazies” during an RPOF conference call²⁶. Even in their letter, they implied that any opposition to Common Core is due to misinformation or conspiracy theories. If we want a “strong and united” Republican party, our officials and leaders engaging in this type of behavior should cease.

In conclusion, the entire system of Common Core standards, tests, and data mining needs to be repealed, not just the PARCC test alone as stated in the letter from the legislative leadership. The \$2 trillion spent by the federal government on education has done nothing to improve educational achievement or close the achievement gap. Coming up with new tests to assess these appallingly bad standards and doing nothing about the data mining is simply unacceptable. If we really want to do the things they say, Florida should reject the entire Common Core system, cut ties with the federal government mandates, and re-establish local control of education.

Sincerely,

Randy Osborne - Chairman Marion County Republican Executive Committee

Eric Miller - State Committeeman, Martin County

John Drozinski - Chairman, Republican Executive Committee Highlands County

Teri Armstrong - State Committeewoman, Marion County

Michael Levine - Chairman, Lake County Republican Executive Committee

Elvira Hasty - Former State Committeewoman, Saint Johns County

Gaye Ellis Chair - Okaloosa, County Republican Executive Committee

Tony Ledbetter - Chairman, Republican Party Volusia

Sheri Ortega - Chairman, Republican Suwannee County

Patricia Sullivan - State Committeewoman, Lake County

Alan Burton - State Committeeman, Volusia County

Marguerite Cavanaugh - Former State Committee Woman, Marion County. Executive VP Florida Eagle Forum

²⁶ See letter from former Marion County state committeewoman Marguerite Cavanaugh about this incident at <http://www.flstopccoalition.org/blog/committeewoman-schools-gop-establishment-political-dangers-common-core.htm/>

