

Developmental, Psychological, Privacy and Health Issues with the Common Core Standards, Tests, and Data Collection System in English Language Arts and Mathematics

Prepared for the Orange County, California Board of Education 11/17/14

Karen R. Effrem, MD

President of Education Liberty Watch and Executive Director of the Florida Stop Common Core Coalition

The Common Core standards and the related and aligned testing and data collection systems are problematic for many reasons. These comments will focus on the developmental inappropriateness; the teaching of vague, subjective, and controversial psychosocial standards; loss of privacy, potential physical harm from technological radiation, and illegal, unconstitutional, and unconsented psychological profiling

There are many standards that veteran educators, standards experts, psychologists, and I, as a pediatrician, find developmentally inappropriate. This problem most likely relates to the fact, pointed out by many veteran teachers, that K-3 teachers and early childhood professionals were excluded from the development of the standards.¹

Some examples of these developmentally inappropriate standards are found in Appendix A. They include requiring children to reason abstractly in math from grades K-12, when according to Piaget, they are not ready to do so until third or fourth grade. Three or four years of these unreasonable requirements will cause great stress in children, preventing them from being able to learn math foundationally and sequentially so that they are able to learn harder concepts later or simply attempt to refuse school, losing the desire and love of learning and feeling frustrated and or stupid as in this case described by a school psychologist seeing greatly expanded numbers of children with symptoms of stress related to Common Core:

- ...an entire third grade class that spent the rest of the day sobbing after just one testing session
- ...a 2nd grader who witnessed this and is now refusing to attend the 3rd grade—this 7-year-old is now being evaluated for psychotropic medication just to go to school²

Parents, students, and teachers from Palm Beach County in my home state of Florida chronicled by the Palm Beach Post and The New York Times described very difficult situations:

- “My third grader loves school, but I can’t get her out of the car this year,” Dawn LaBorde, who has three children in Palm Beach County schools, told the gathering, through tears. Her son, a junior, is so shaken, she said, “I have had to take him to his doctor.” She added: “He can’t sleep, but he’s tired. He can’t eat, but he’s hungry.”³
- One father broke down as he said he planned to pull his second grader from school. “Teaching to a test is destroying our society,” he said.⁴

¹ Valerie Strauss – A Tough Critique of Common Core on Early Childhood Education – The Answer Sheet, Washington Post 1/29/13
<http://www.washingtonpost.com/blogs/answer-sheet/wp/2013/01/29/a-tough-critique-of-common-core-on-early-childhood-education/>

² <http://dianeravitch.net/2013/11/10/test-related-stress-on-the-rise-in-new-york/>

³ Lizette Alvarez - States Listen as Parents Give Rampant Testing an F – The New York Times 11/9/14

http://www.nytimes.com/2014/11/10/us/states-listen-as-parents-give-rampant-testing-an-f.html?hpw&rref=education&action=click&pgtype=Homepage&module=well-region®ion=bottom-well&WT.nav=bottom-well&_r=0

⁴ Ibid

- Hours to prep for computerized testing of kindergartners. “I watched a student suffer for over an hour. They had no idea how to work the computer mouse.” Five teachers, working one-on-one with students got only 10 of 120 students done in one school day. “That night I went home and cried.” - Chris White, teacher at a Title 1 elementary school.⁵
- Children don’t know the language – what’s ‘drag and drop’ to a child who’s not worked on a computer? The books were designed to go with one test, we’re using another. – Karla Yurick, 5th grade math teacher⁶

Other serious signs of stress even in young children include:

- Self-mutilating behaviors
- Insomnia
- Panic attacks
- Loss of appetite
- Anxiety
- Depressed mood

Another math standard that is unnecessarily complex for young children include these identified by former US Department of Education math and science expert Ze’ev Wurman:

MACC.K.G.1.1 Identify and describe shapes (squares, circles, triangles, rectangles, hexagons, cubes, cones, cylinders, and spheres) -Describe objects in the environment using names of shapes, and describe the relative positions of these objects using terms such as above, below, beside, in front of, behind, and next to.

Child psychologist, Dr. Gary Thompson, from whom you heard in October, said the following of certain Common Core math standards⁷:

“There are kids/teens (as well as adults like myself) who will never master “symbolic processing” of numbers and math concepts.....just like I will never be able to hit a 90 mile per hour fastball 385 feet over the left field wall in Dodger Stadium. Ever.

We have high functioning, genius IQ autistic/Aspergers kids who, despite demonstrated giftedness in math, will never be able to answer this question due to their brains’ inability to process anything symbolically....let alone stuck at a desk in front of a computer screen.

Tens of thousands of Utah public school children will never be able to process math in this manner over the course of their public school education.

This is cognitive child abuse.”

⁵ Sonja Isgar : Meeting extra: Common Core disorder? Simple math in 15 not-simple steps? – Palm Beach Post 10/14/14
<http://extracredit.blog.palmbeachpost.com/2014/10/14/meeting-extra-common-core-disorder-simple-math-in-15-not-simple-steps/>

⁶ Ibid

⁷ <http://whatiscommoncore.wordpress.com/tag/dr-gary-thompson/>

Utah child psychologist Joan Landes said the following:

“I agree that CC standards are not only developmentally inappropriate for youngsters, they focus on a very limited range of learning modalities (neo-cortical left-brain areas) thus limiting future abilities to learn much more complex subjects. The CC developers entirely missed the point of early/young childhood education when they focus on either the acquisition of facts (losing the opportunity to develop other areas of the brain to enhance future learning capabilities) or by making demands for abstract reasoning before developmentally ready (which will create a myriad of behavioral, emotional and learning problems). In addition, because the standards and assessments are so hyper-focused and high pressured for rigid cognitive (left-brain) activities, the children who have learning disabilities and/or delays will find school even more destructive to self-confidence and flexible learning.”⁸

Professor Joann Yatvin, an expert member of the National Council of Teachers of English lists some general developmental problems with the English standards⁹:

Some standards call on young children to behave like high school seniors, making fine distinctions between words or literary devices, carrying on multiple processes simultaneously, and expressing their understandings in precise academic language. Others expect them to have a strong literary background after only two or three years of schooling. Some standards are so blind to the diversity in American classrooms that they require children of different abilities, backgrounds, and native languages to manipulate linguistic forms and concepts before they have full control of their own home language. And, sadly, a few standards serve only to massage the egos of education elitists, but are of no use in college courses, careers, or everyday life.

Examples of developmentally problematic English standards include:

CCSS.ELA-Literacy.SL.K.1 Participate in collaborative conversations with diverse partners about *kindergarten topics and texts* with peers and adults in small and larger groups.

CCSS.ELA-Literacy.SL.K.1a Follow agreed-upon rules for discussions (e.g., listening to others and taking turns speaking about the topics and texts under discussion).

CCSS.ELA-Literacy.SL.K.1b Continue a conversation through multiple exchanges.

Comment: Asking children this young to behave like little adult corporate board members is completely inappropriate, especially when many adults have not mastered these non-cognitive workforce based competencies. (Effrem)

The highly respected Gesell Institute for Child Development said the following about these standards back in 2010:

The core standards being proposed by the National Governors Association and the Council of Chief State School Officers are off the mark for our youngest learners. We at Gesell Institute call for a new set of standards for Kindergarten through Grade 3 that adhere to solid principles of child development based on what research says about how and what young children learn during the early years, birth to age eight. The proposed standards for Kindergarten through grade 3 are inappropriate and unrealistic. Policy must be set based on hard data and not on unrealistic goals surrounding test scores...

⁸ Ibid.

⁹ Joanne Yatvin: The Common Core Standards May Be Harmful to Children - <http://atthechalkface.com/2014/01/05/joanne-yatvin-the-common-core-standards-may-be-harmful-to-children/>

...We urge the National Governors Association and the Council of Chief State School Officers to respect the individual developmental differences of children and revise the K-3 standards based on research and the advice of experts in the field of early childhood. Having endorsed The Alliance for Childhood’s Joint Statement of Early Childhood Health and Education Professionals on the Common Core Standards Initiative, we support the call to withdraw the early childhood standards and create a consortium of experts “to develop comprehensive guidelines for effective early care and teaching that recognize the right of every child to a healthy start in life and a developmentally appropriate education.”¹⁰ (<http://www.allianceforchildhood.org/>)

That Joint Statement of Early Childhood Health and Education Professionals on the Common Core Standards Initiative signed by more than five hundred early childhood professionals opposed to Common Core contains these four important points about the consequences of this problem:¹¹

1. The K-3 standards will lead to long hours of direct instruction in literacy and math. This kind of “drill and grill” teaching has already pushed active, play-based learning out of many kindergartens.
2. The standards will intensify the push for more standardized testing, which is highly unreliable for children under age eight.
3. Didactic instruction and testing will crowd out other crucial areas of young children’s learning: active, hands-on exploration, and developing social, emotional, problem-solving, and self-regulation skills—all of which are difficult to standardize or measure but are the essential building blocks for academic and social accomplishment and responsible citizenship.
4. There is little evidence that standards for young children lead to later success. The research is inconclusive; many countries with top-performing high-school students provide rich play-based, nonacademic experiences—not standardized instruction—until age six or seven.

The issue of teaching, testing and collecting data on psychological attitudes, values and beliefs is extremely serious and a major concern to parents, citizens, and experts. It was serious enough to be mentioned in Florida Governor Rick Scott’s 2013 executive order on the standards:

“WHEREAS, Floridians have raised concerns about the Federal government’s interest in using educational standards and assessments to collect data on psychological attitudes, values, and beliefs...”¹²

Despite promises by proponents that the Common Core Standards are “academic” and “rigorous,” documentation from the U.S. Department of Education, the National School Boards Association, The American School Counselors Association, The Collaborative for Academic, Social and Emotional Learning, school districts, and other sources indicate that a number of standards will be used for psychological training of children starting at a young age as evidenced by the following quotes:

- “In national policy, there is increasing attention on 21st-century competencies (which encompass a ***range of noncognitive factors***, including grit), and persistence ***is now part of the Common Core State Standards*** for Mathematics.”¹³ (Emphasis added.)

¹⁰ <http://www.allianceforchildhood.org/standards>

¹¹ http://www.edweek.org/media/joint_statement_on_core_standards.pdf

¹² Governor Rick Scott Executive Order 13-276 <http://www.flgov.com/wp-content/uploads/2013/09/EO-13-276.pdf>

¹³ U.S. Department of Education Office of Technology – Promoting Grit, Tenacity, and Perseverance: Critical Factors for Success in the 21st Century – February 2013 <http://www.ed.gov/edblogs/technology/files/2013/02/OET-Draft-Grit-Report-2-17-13.pdf>

- **“National model standards often contain elements of social and emotional learning. For example, 42 states and two territories are in the process of adopting the Common Core Standards** in Math and English Language Arts, which contain standards on communication (especially speaking and listening), cooperation skills, and problem solving.”¹⁴ (Emphasis added.)
- “ASCA [American School Counselors Association] Mindsets & Behaviors align with specific standards from the Common Core State Standards through connections at the competency level.”¹⁵
- “There are **many other Common Core Standards that these social and emotional basic skills can be integrated with.**”¹⁶ (Emphasis added.)
- “As we began to unpack these standards, we found a **clear correlation between Common Core and social, emotional learning.**”¹⁷ (Emphasis added.)
- **“Various elements of SEL can be found in nearly every state’s K-12 standards framework and in the Common Core State Standards for the English Language Arts.”**¹⁸(Emphasis added.)

A more comprehensive list of these subjective, controversial, psychosocial and sociocultural standards is available in Appendix B of this document, but here are a few examples:

- CCSS.Math.Practice.MP1 Make sense of problems and persevere in solving them.

Comment: Admitted by an educator based on CASEL criteria to be a psychosocial skill for “Responsible Decision Making” that “includes problem identification and problem solving; evaluation and reflection; personal, social, and ethical responsibility.” This is also admitted by the US Department of Education report discussed above to be a “non-cognitive,” “21st Century” skill. So, if a student fails the questions related to this subjective national standard on a federally funded, federally supervised national test such as PARCC, which is still under consideration in Florida, or some other national test like ACT that will be doing “behavioral assessment,” will that data in their permanent data file to be seen by employers and colleges and who knows who else show that they are not personally, socially, and ethically “responsible”?
- CCSS.ELA-Literacy.W.2.3 Write narratives, in which they recount a well-elaborated event or short sequence of events, include details to describe actions, thoughts, and feelings, use temporal words to signal event order, and provide a sense of closure.

Comment: Admitted by Nancy Orme of Anchorage School District to correspond to socioemotional learning standards for “Self-Awareness” that require students to “demonstrate awareness of their emotions;” “recognize and label emotions/feelings;” and “describe their emotions and feelings and the situations that cause them (triggers).”¹⁹
- CCSS.ELA-Literacy.L.3.5c - Distinguish shades of meaning among related words that describe states of mind or degrees of certainty (e.g. knew, believe, suspected, heard, wondered)

¹⁴ Linda Dusenbury - State Learning Standards to Advance Social and Emotional Learning: The CASEL State Scan of Social and Emotional Learning Standards: Preschool through High School – Collaborative for Academic, Social, and Emotional Learning, April 2011

<http://casel.org/wp-content/uploads/2011/04/Brief-on-the-State-Scan-4-18-2011.pdf>

¹⁵ American School Counselors Association - Change Behaviors by Changing Mindsets -

<https://www.schoolcounselor.org/magazine/blogs/november-december-2014/change-behaviors-by-changing-mindsets>

¹⁶ EduThompson Blog - Integrating Social Emotional Curricula and the Common Core – 7/20/13

<http://insidetheclassroomoutsidethebox.wordpress.com/2013/07/07/integrating-social-emotional-curricula-and-the-common-core/>

¹⁷ Pamela Orme, Anchorage, School District, social studies curriculum coordinator, Social Emotional Learning in Common Core State Standards - <http://www.youtube.com/watch?v=ZZMhn-9SRoA>

¹⁸ National Association of State Boards of Education – *Social-Emotional Learning* - From Practice to Policy, October 2013

<http://www.nasbe.org/wp-content/uploads/FPP-Social-Emotional-Learning.pdf>

¹⁹ Pamela Orme, Anchorage, School District, social studies curriculum coordinator, Social Emotional Learning in Common Core State Standards - <http://www.youtube.com/watch?v=ZZMhn-9SRoA> starting at 1:23.

Comment: This requires abstract thinking and knowing children’s state of mind, others’ states of mind and applying it to the meanings of various words. According to Piaget, children are not really capable of abstract thinking until eleven or twelve years of age. Knowing states of mind is quite a subjective endeavor at any age.

- CCSS.ELA-Literacy.CCRA.W.5 Develop and strengthen writing as needed by planning, revising, editing, rewriting, or trying a new approach.

Comment: This standard has been acknowledged by an educator based on criteria from the Collaborative for Academic Social and Emotional Learning to be a psychosocial skill that deals with “Self-Awareness/Management and “focuses on identifying and recognizing emotions; self-efficacy; control of oneself; self-motivation and discipline; goal setting; and organizational skills.”²⁰

That there is psychological and attitudinal teaching in curriculum and lesson plans aligned to the Common Core is also very clear:

- September 9, 2013 Political Party Activity for middle school students in Indian River County²¹ in English class linked to specific Common Core standards per teacher’s lesson plan:²²
CCSS: LACC.68.RH.1.2, LACC.68.RH.2.4, LACC.68.WHST.1.2, LACC.7.SL.1.1
- The now Common Core aligned SpringBoard English Language Arts curriculum, having been previously adopted by several large Florida counties, such as Orange County²³ and Hillsborough County²⁴ is now bidding for the 2013-14 Florida statewide textbook adoption in grades 6-8.²⁵ This English curriculum is published by the College Board, now led by chief Common Core English architect David Coleman and responsible for the SAT college entrance exam, the GED high school graduation test, and the AP tests. This curriculum contains many controversial, non-cognitive, psychosocial survey assessments scattered throughout the curriculum that will become part of children’s academic record for life:
 - Activity 2.14 – From a Marxist Perspective in Unit 2 the Collective Perspective²⁶ that describes Marx as a “philosopher, economist, political theorist, historian, and published author” and contains ten survey questions requiring children to “Review these statements about the importance of money, power, and social class, and then circle the responses that most nearly reflect your beliefs” by saying where they “Strongly Agree, Agree, Disagree, or Strongly Disagree”
 - “I would rather marry someone I love than someone that is rich.”
 - “Middle class people are happier than wealthy or poor people”
 - “People that have power have earned it and deserve to enjoy it.”

²⁰ EduThompson Blog - Integrating Social Emotional Curricula and the Common Core – op. cit.

²¹ Political Party Activity for middle school students in Indian River County <http://watchdogwire.com/florida/2013/09/16/breaking-news-fl-middle-school-student-survey-asks-what-kind-of-a-party-animal-are-you/>

²² Lesson plan containing links to specific Common Core standards
<http://teachersites.schoolworld.com/webpages/sgmsscivics/masterisn.cfm?subpage=1764110>

²³ http://www.fldoe.org/board/meetings/2007_02_20/OrangeStRep.pdf

²⁴ Marilyn Brown – *New Curriculum Becomes A SpringBoard For Teacher Criticism* - Tampa Tribune 3/6/09
<http://tbo.com/news/education/new-curriculum-becomes-a-springboard-for-teacher-criticism-113138>

²⁵ See detailed bids at http://www.fldoe.org/bii/instruct_mat/pdf/2013-14DraftSBR.pdf

²⁶ SpringBoard English Textual Power Senior English, College Board, pp. 113-116, documentation available on request.

- “The newest program from The Social Express provides teachers and professionals with reporting summaries that are relevant to them. This internet-based interactive education technology tool ***aligns with the Common Core State Standards (CCSS)***, an initiative that is already being implemented nation-wide in the public schools. This new feature of the program will make writing social skill educational goals and reporting on progress easier for all professionals working with their students.”²⁷
- Here is such an example for first grade English Language Arts, entitled Voices, approved for use with the Common Core in Utah:²⁸
 - “In the Voices Democracy theme, students use their voices to advocate solutions to social problems that they care deeply about. They are involved in learning the following theme related social knowledge and skills: social role models, ***social advocacy***, and respect for each other.” (Emphasis added).

Comment: Nothing in the discussion of the Common Core standards by the proponent groups has discussed aligned curriculum to be used for social advocacy. This is a complete betrayal of the advertising of these standards and their aligned curriculum as being “clear,” “academic,” and “rigorous.”
 - “Tell students when they write a call to action, they should include emotional words to get readers to feel so strongly about a problem that they want to do what is being asked of them.”

Plans to assess psychological traits in the Common Core aligned assessments are also abundantly evident. Despite the denial of federal involvement in test development on the FL DOE website,²⁹ it is clear that the federal government has a very large role in funding and supervising the development of the national tests for these two multi-state testing consortia. This quote from the US DOE announcement of the formation of the technical review panel in March of this year indicates that the federal government is involved in supervising the writing of the test questions for the Common Core tests that, as shown below, will include testing of these psychological attitudes and traits :

- "The review will focus on two broad areas of assessment development: the consortium's research confirming the validity of the assessment results and the consortium's **approach to developing items and tasks.**" (Emphasis added)

Here are some other examples of assessing attitudes and psychological traits

- “[A]s new assessment systems are developed to reflect the new standards in English language arts, mathematics, and science, significant attention will need to be given to the design of tasks and situations that call on students to apply a range of 21st century competencies that are relevant to each discipline. *A sustained program of research and development will be required to create assessments that are capable of measuring cognitive, intrapersonal, and interpersonal skills.*” (Emphasis added).
- “There are important opportunities to leverage new and emerging advances in technology (e.g., educational data mining, affective computing, online resources, tools for teachers) to develop unprecedented approaches for a wide range of students.”³⁰
- The “affective computing” mentioned above, according to the same federal report, is accomplished using the devices in this picture:³¹

²⁷ PR Web - School Districts Pilot Web-Based Social Skills Program by The Social Express - <http://www.prweb.com/releases/social-skills-learning/social-skills/prweb10385075.htm> 1/31/13

²⁸Voices ELA Curriculum as quoted and filmed in You Tube video “Indoctrination in Common Core ELA Texts”: <http://www.youtube.com/watch?v=rGph7QHmzo8&feature=youtu.be>

²⁹ Florida Department of Education -Demystifying the Movement: Answers to Common Myths About the Common Core State Standards <http://www.fldoe.org/schools/pdf/dmfaqccss.pdf%23page=1&zoom=auto,0,800>. Last accessed 10/18/13. No longer available as of 10/28/13. Quoted and analyzed at: <http://www.flstopccoalition.org/news/2013-07/press-release-bennett-doe-disseminating-false-information-common-core.htm#sthash.vHCgW1EV.dpuf>

³⁰ Grit report, op cit

³¹ Ibid

Exhibit 11. Four parallel streams of affective sensors used while a student is engaged in Wayang Outpost, an online tutoring system



Source: Woolf, B., Baleson, W., Anaya, I., Dregan, T., Cooper, D., & Picard, R. (2009). Affect-aware tutors: Recognizing and responding to student affect. *International Journal of Learning Technology*, 3(4), 129-164.

- The American Institutes for Research (AIR), which is responsible for the Smarter Balanced Assessment Consortium (SBAC), the test used in California, describes itself as “one of the world's largest behavioral and social science research and evaluation organizations” on its website.³² AIR is also involved in many additional non-academic, psychosocial activities as described by psychologist and economist Dean Kalahar³³, with additional comments by Education Liberty Watch and the Florida Stop Common Core Coalition:
 - **Emotions Over Academics:** More of AIR's psychosocial agenda has been exposed in a brilliant article in *American Thinker* by psychologist and economist Dean Kalahar.³⁴ He rightly explains that “those who write the test set the curriculum.”
 - He quotes the goal of AIR's National Clearinghouse on Supportive School Discipline (NCSSD) from their website as follows:

"Changing the culture of communities and schools in which certain groups of students -- racial and ethnic minorities; lesbian, gay, bisexual, transgender and questioning (LGBTQ) youth; and/or students with emotional, behavioral and cognitive disabilities -- face disproportionate school disciplinary action."

This is a social justice agenda instead of one to improve academic learning.
 - “AIR promotes ‘Response to Intervention (RTI)’ practices which is education-speak for Common Core's universal ‘screening’ of children and vast data collection practices. [The extremely subjective nature of mental screening and the problems with the over-prescription of dangerous and ineffective psychiatric drugs for children has been extensively chronicled by Education Liberty Watch³⁵].
 - AIR focuses on controversial “social and emotional intelligence” theories that distort achievement differences to blur the line of competency. [AIR has an entire section of their website devoted to the subjective topic of “Social and Emotional Learning.” Another name for this is “non-cognitive learning,” which is much touted in US Department of Education documents and those of many other organizations cited in my Florida testimony.³⁶]

³² <http://www.air.org/about-us>

³³ http://www.americanthinker.com/blog/2014/05/the_ugly_truth_behind_the_florida_core_standards_test.html

³⁴ http://www.americanthinker.com/blog/2014/05/the_ugly_truth_behind_the_florida_core_standards_test.html

³⁵ <http://edlibertywatch.org/category/mental-health/> and http://www.edwatch.org/ab_federal.html

³⁶ Effrem, K. - Comments on the Psychological and Developmental Aspects of the Florida's Common Core Standards – 2013
<http://bit.ly/1mcZtm4>

- **National Curriculum and Federal Interference**
 - “AIR writes ‘Race to the Top’ guidance papers to foster implementation of President Obama's nationalized education agenda.” [The legal, constitutional, and local control problems with Common Core are discussed in Chapter 1 of our policy analysis³⁷].
 - One of AIR's chief research analysts in mathematics, Steve Leinwind, has the following quote in his bio³⁸:
 - "The fact that, for the first time, the U.S. has what is **essentially a national curriculum**, equivalent in quality to what is found in the highest scoring countries in the world, means that the focus of leadership can finally shift from arguing about what math to teach, to how best to teach the agreed upon content to all students." (Emphasis added)
 - AIR also admits that Common Core has mandates, federal strings, and they will be testing based on Common Core in one of their presentations³⁹ (bold emphasis in original, italics added):
 - The CCSS **mandates** the student learning outcomes for every grade level. Students will be tested and **instructional effectiveness will be measured based on CCSS**. *Federal funding* is tied to CCSS adoption, implementation, and accountability. English Language Arts and Mathematics **CCSS are just the beginning. . . more subject area standards are being developed.**
- Career and Teacher Control
 - AIR champions "College and career readiness," which is euphemistic terminology for Common Core's agenda of centralized control over children's career paths. [This is the School to Work agenda that is pushed by Mark Tucker, president of the National Center for Education and the Economy⁴⁰ and author of the infamous “Dear Hillary Letter that spelled out his vision of controlling the career choices of everyone.⁴¹]
 - AIR advances the "Value added measures in education," an empirically discredited methodology of teacher evaluation.⁴²
- An official for the ACT who is developing Common Core tests for other states in grades 3-10 such as those that have pulled out of PARCC and SBAC said, "There would be interest inventories for students, as well as **assessment of behavioral skills** for students and teachers to evaluate."⁴³ (Emphasis added)
- Psychological assessment and monitoring is also accomplished directly via Common Core aligned curriculum,
 - “The Student Observation Form on Assessment Handbook page 11 is an informal assessment tool that notes **growth and change in individual students’ behaviors and attitudes.**” (Emphasis added)
 - Under that rubric,⁴⁴ students are graded at various levels on whether they “Use first person plural voice (our) to **advocate ways to solve the problem.**” (Emphasis added)

³⁷ Effrem, K. and Osborne, R. – Florida’s Common Core Standards: A Policy Analysis – 2013 Florida Stop Common Core Coalition and Florida Eagle Forum <http://bit.ly/1jCRT9t>

³⁸ <http://steveleinwand.com/about/>

³⁹ http://www.betterhighschools.org/MidwestSIG/documents/Ratway_Presentation.pdf

⁴⁰ www.ncee.org

⁴¹ http://www.eagleforum.org/educate/marc_tucker/

⁴² For more details on this see the website VAMboozled at <http://vamboozled.com/>

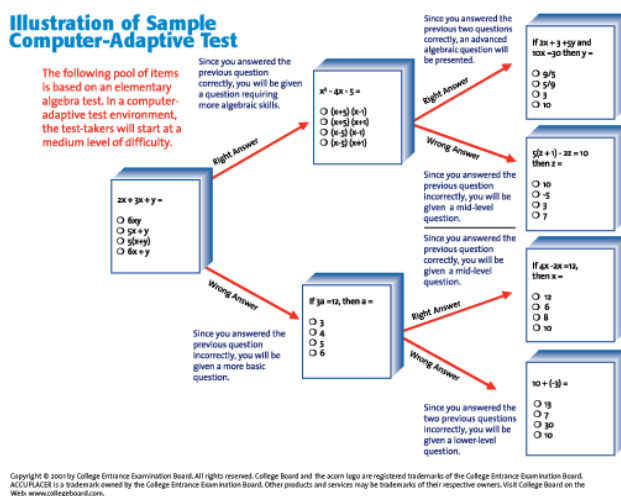
⁴³ http://blogs.edweek.org/edweek/college_bound/2012/07/act_plans_to_roll_out_career_and_college_readiness_tests_for_3rd-10th_grades.html

⁴⁴ Ibid

- Activity 4.9 – Justice and Moral Reasoning⁴⁵ contains a survey in the SpringBoard curriculum, which is used at least in three California school districts⁴⁶, discussed above called “How Just Are You?” with items such as:
 - I should pay all my taxes because I could go to jail if I do not
 - people will think of me as a good citizen
 - my taxes along with those of others will help to pay for services used by all

Depending on whether students respond with a majority of “a,” “b,” or “c” responses they are forced to rate themselves as “pre-conventional,” “conventional,” and “post-conventional” based on psychologist Lawrence Kohlberg’s Three Levels and Six Stages of Moral Reasoning. This is clearly a psychological test about which parents receive no notification and for which their consent is not asked.

SBAC especially, through AIR will be using computer adaptive testing where the questions change depending on the answers to the previous questions. The tests results can be manipulated depending on the need of those in charge to make the test scores look better or worse, to inculcate certain attitudes or behaviors by not letting the student continue until he has answered a certain way all without the parent, the teacher or policy makers knowing what is happening. This creates stress, uncertainty, manipulation, makes the tests useless for the much ballyhooed comparisons across state lines or for improving learning, because no one ever sees the actual questions or results.. Here is an illustration:



Both PARCC and SBAC, the two multi-state consortia that are developing the federally funded, federally supervised national Common Core aligned test which will assess these various psychological parameters, has signed a memorandum of understanding with the federal government to share individual student data with them:

“Comply with and where applicable coordinate with the ED staff to fulfill the program requirements established in the RTTA Notice Inviting Applications and the conditions on the grant award, as well as to this agreement, including, but not limited to working with the Department to develop a strategy to make **student - level data that results from the assessment system available on an ongoing basis for research, including for prospective linking, validity, and program improvement studies**; subject to applicable privacy laws”⁴⁷ (Emphasis added)

⁴⁵ SpringBoard English Textual Power Level 5- College Board, p, 256, documentation available on request.

⁴⁶ http://www.susanohanian.org/show_atrocities.php?id=9381

⁴⁷ COOPERATIVE AGREEMENT Between the U.S. DEPARTMENT OF EDUCATION and the PARTNERSHIP FOR ASSESSMENT OF READINESS OF COLLEGE AND CAREERS 1/7/11 PR/Award #: S395B10001 and S395B10001A <http://www2.ed.gov/programs/racetothetop-assessment/parcc-cooperative-agreement.pdf>

This is highly significant because it shows that one of the main goals for uniform national assessments like PARCC and SBAC is for the federal government to have access to highly personal individual student data. The “subject to applicable privacy laws” part of that agreement quoted just above is useless. The advocates of this kind of invasive data collection on our children and their families constantly say that student privacy is protected by Family Educational Rights and Privacy Act (FERPA) and that parents should not be concerned. Yet, because of the significant weakening of FERPA regulations that occurred in 2011, there are many people who have access to students’ sensitive individually identifiable information, including the psychological data described above without parental consent:

Here is the definition of authorized representative in the federal regulations:

“Authorized representative means ***any entity or individual designated by a State or local educational authority*** or an agency headed by an official listed in §99.31(a)(3) to conduct—with respect to Federal- or State-supported education programs—any audit or evaluation, or any compliance or enforcement activity in connection with Federal legal requirements that relate to these programs.”⁴⁸ (Emphasis added)

§ 99.31 Under what conditions is prior consent not required to disclose information?⁴⁹

(a) An educational agency or institution may disclose personally identifiable information from an education record of a student without the consent required by §99.30 if the disclosure meets one or more of the following conditions:

(1)(i)(A) The disclosure is to other school officials, including teachers, within the agency or institution whom the agency or institution has determined to have legitimate educational interests.

(B) ***A contractor, consultant, volunteer, or other party*** to whom an agency or institution has outsourced institutional services or functions may be considered a school official under this paragraph provided that the outside party... (Emphasis added)

This expansion of who has access to personally identifiable information occurred as a direct result of a regulatory weakening of FERPA by the Obama Administration. In fact, The Electronic Privacy Information Center (EPIC) is suing the U.S. Department of Education in federal court over this very matter.

So instead of knowledge-based academic and cognitive data, our children will be taught and assessed on controversial psychosocial attitudes and beliefs and have that data become part of their permanent records, all without parental knowledge or consent. This data can and most likely will be used to psychologically profile children for everything from “kindergarten readiness;” to the type of job for which government or corporate authorities determine they are most suited; to whether they are “at risk” for some type of psychiatric diagnosis, even though mental screening of children is notoriously inaccurate; to whether they have adequately internalized some government desired concept.

There is a large loophole in the Protection of Pupil Rights Amendment⁵⁰ which is supposed to protect students from surveys asking about “Mental and psychological problems potentially embarrassing to the student and his/her family,” because it does not apply to “curriculum and instructional materials” or to “tests and assessments.”

⁴⁸ Code of Federal Regulations – §99.3 What definitions apply to these regulations? - <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=11975031b82001bed902b3e73f33e604&rgn=div5&view=text&node=34:1.1.1.1.33&idno=34%2334:1.1.1.1.33.4.132.1#34:1.1.1.1.33.1.134.3>

⁴⁹ 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=34:1.1.1.1.33&idno=34#34:1.1.1.1.33.4.132.1>

⁵⁰ 20 U.S.C. § 1232h; 34 CFR Part 98

In addition, as was discussed above, the federal government's involvement in the writing of national test questions, the requirement to give individual student data to the federal department of education, and the regulatory weakening of FERPA by the Obama administration have combined to all but completely erode any hope a student has for protection from such unconsented psychological probing and for data privacy.

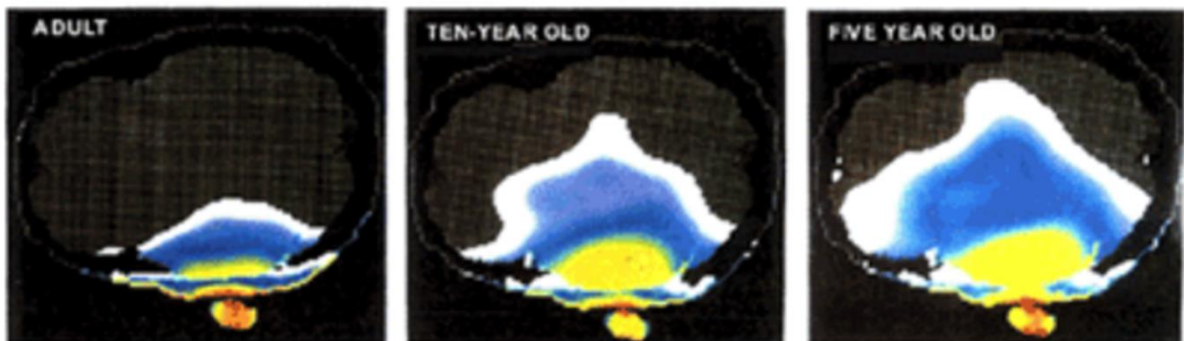
This information combined with the federal plans discussed above to make sure that these federally funded and supervised assessments measure psychological attributes which will then be kept in a child's lifelong data dossier is in this author's opinion as a pediatrician and a parent, the worst, most freedom endangering aspect of the entire Common Core system.

Before concluding, it should be mentioned that there is growing concern in medical circles about the considerable potential harm that radiation from wireless technology does to children, especially young ones:

- The United States has more wireless technology than anywhere else in the world⁵¹:



- The fastest growing segment of the cell phone market is 8-12 year olds, and by 2010 there will be 10.5 million cell phone users under the age of 13. .
- According to the National Institute for Environmental Health Sciences, "EMF has been recommended to be classified as a Group 2B carcinogen under standards established by the World Health Organization's Agency for Cancer Research", which happens to be the same category containing DDT, formaldehyde, and lead⁵²
- Children's skulls are much less dense; hence the radiation plume coming from a cell phone can easily penetrate their skull⁵³:



- France is in the process of banning the use of cell phones for children 12 and under.⁵⁴

⁵¹ <http://www.mapcruzin.com/images/cell-towers-google-earth-380x382.jpg>

⁵² "Adverse Health Effects of EMF Stress & Biopro Technology Solutions" by Tim Leitch
http://bioenergy.timleitch.net.nz/protection/stress_effects_outline.htm and http://www.mercola.com/article/emf/emf_dangers.htm

⁵³ <http://articles.mercola.com/sites/articles/archive/2000/11/26/mobile-phones-part-four.aspx>

In conclusion, because of the many academic problems, the psychological training and testing without parental consent and teaching of many standards that are completely developmentally inappropriate, Education Liberty Watch strongly recommends the following:

- 1) Orange County and California should withdraw from the Common Core Standards in Mathematics and English Language Arts. Many of the standards highlighted in this document as well as in the comments of other experts make them too problematic to keep.
- 2) The K-3 standards should be rewritten by a panel of early childhood/early elementary teachers and professionals that can put together a developmentally appropriate set of standards that will prevent the stress related illness that is occurring now related to the frustration and inability to learn from these standards and their related tests. I concur with Utah psychologist Joan Landes who says:

“In my opinion, a better approach to education in the primary grades would incorporate many of the tried and true activities from the first part of the 20th century to activate many disparate areas of their incredibly plastic brain (not to mention a child’s heart): Learning an instrument, Character values, Art, Sports, Games, Penmanship, Speaking, Singing, Reading and listening to narrative fiction and poetry and memorization (the kids even used to memorize poetry in foreign languages!). These activities (while not meeting a fact-acquisition or analytical benchmark) nevertheless activates critical areas of the brain which increases later connections exponentially.”⁵⁵
- 3) Neither SBAC nor any other test should be examining psychological attitudes, values and beliefs.
- 4) No curriculum used in California, whether Common Core aligned or not, should be teaching or assessing psychological or psychosocial attitudes, values and beliefs.
- 5) Because of the cost, the time lost from computer use for testing, the inability of parents and teachers to see what is being tested or emphasized, the loss of data privacy, and the potential dangers from radiation, tests should be given by paper and pencil.

⁵⁴ <http://www.lesleyknight.com/AnnouncementRetrieve.aspx?ID=1024>

⁵⁵ Landes – See footnote

Appendix A – Examples of Developmentally Inappropriate Common Core Standards

The concerns about the following standards being developmentally inappropriate are based on my opinion as a pediatrician and concurrence with the opinions of several experts who will be cited below. They will be divided into subject areas.

Mathematics

This anchor standard is of concern to me as a pediatrician:

Mathematical Practices – Reason abstractly and quantitatively

Comment: According to Piaget, children are not able to reason abstractly until age eleven or twelve. That is very problematic for students in grades K-4. When forced to do math that they are not prepared to understand due to development, there is a significant risk of stress induced symptoms, which teachers, parents, psychologists, and pediatricians have reported,⁵⁶ as well as a loss of aptitude for and enjoyment of mathematics.

I concur with child psychologist Dr. Megan Koschnick⁵⁷ regarding this math standard:

Math.Content.K.OA.A.5 Fluently add and subtract within 5

Comment: This standard will require great amounts of teaching time and time for repetitive training instead of teaching kindergarten students basic facts like counting, one to one number correspondence, etc.

I also concur with Ze'ev Wurman, a nationally renowned math standards expert who found the following standards developmentally inappropriate. Those relevant standards and his comments from his written Florida testimony⁵⁸ are reproduced below

MACC.K.CC.1.1 - Count to 100 by ones and by tens.

Comments: The counting to 100 is unwisely aggressive. As a consequence, in grade 1 it is only extended to 120. A more reasonable sequence would be to count to 20 in Kindergarten and to 100 in grade 1.

MACC.K.CC.1.2 Count forward beginning from a given number within the known sequence (instead of having to begin at 1).

Comments: Unwisely aggressive for numbers up to 100. A limit of 20 would be more appropriate.

MACC.K.G.1.1 Identify and describe shapes (squares, circles, triangles, rectangles, hexagons, cubes, cones, cylinders, and spheres) -Describe objects in the environment using names of shapes, and describe the relative positions of these objects using terms such as above, below, beside, in front of, behind, and next to.

Comments: Inappropriate for 3D shapes, and unnecessary for 2D shapes beyond rectangles (or even just squares).

⁵⁶<http://dianeravitch.net/2013/10/13/dr-joseph-ricciotti-how-ccss-ruins-kindergarten/>

⁵⁷<http://www.youtube.com/watch?v=vrQbJlmVJZo&feature=youtu.be>

⁵⁸<http://www.flstopccoalition.org/files/3B2497D3-41D5-4AD3-A4D5-53948BCAB7C1--A5E7A47D-5636-4FED-BA2C-3BA891684233/fl-math-complete.pdf?lc=10162013085509>

MACC.K.G.1.2 Identify and describe shapes (squares, circles, triangles, rectangles, hexagons, cubes, cones, cylinders, and spheres) - Correctly name shapes regardless of their orientations or overall size.

Comments: Inappropriate for 3D shapes, and unnecessary for 2D shapes beyond rectangles (or even just squares).

MACC.K.G.1.3 Identify and describe shapes (squares, circles, triangles, rectangles, hexagons, cubes, cones, cylinders, and spheres) - Identify shapes as two-dimensional (lying in a plane, “flat”) or three-dimensional (“solid”).

Comments: Inappropriate. Children at this age can intuit the difference between 2D and 3D but many have difficult time to verbalize it and/or visualize it.

MACC.K.G.2.4 Analyze, compare, create, and compose shapes - Analyze and compare two- and three-dimensional shapes, in different sizes and orientations, using informal language to describe their similarities, differences, parts (e.g., number of sides and vertices/“corners”) and other attributes (e.g., having sides of equal length).

Comments: Inappropriate and unnecessarily demanding.

MACC.K.G.2.6 Analyze, compare, create, and compose shapes - Compose simple shapes to form larger shapes. For example, “Can you join these two triangles with full sides touching to make a rectangle?”

Comments: Inappropriate and unnecessarily demanding. Grade 2 standard in Singapore.

MACC.K.MD.1.2 Describe and compare measurable attributes - Directly compare two objects with a measurable attribute in common, to see which object has “more of”/“less of” the attribute, and describe the difference. For example, directly compare the heights of two children and describe one child as taller/shorter.

Comments: Inappropriate and unnecessarily demanding. Grade 2 standard in Singapore.

MACC.K.OA.1.3 Understand addition as putting together and adding to, and understand subtraction as taking apart and taking from - Decompose numbers less than or equal to 10 into pairs in more than one way, e.g., by using objects or drawings, and record each decomposition by a drawing or equation (e.g., $5 = 2 + 3$ and $5 = 4 + 1$).

Comments: Recording by equations and number sentences is inappropriate.

MACC.K.OA.1.4 Understand addition as putting together and adding to, and understand subtraction taking apart and taking from - For any number from 1 to 9, find the number that makes 10 when added to the given number, e.g., by using objects or drawings, and record the answer with a drawing or equation.

Comments: Borders on educationally inappropriate, particularly the recording by equation or number sentence.

MACC.1.G.1.2 Reason with shapes and their attributes - Compose two-dimensional shapes (rectangles, squares, trapezoids, triangles, half-circles, and quarter-circles) or three-dimensional shapes (cubes, right rectangular prisms, right circular cones, and right circular cylinders) to create a composite shape, and compose new shapes from the composite shape.

Comments: Premature and inappropriate. Grade 2 standard in Singapore.

MACC.1.G.1.3 Partition circles and rectangles into two and four equal shares, describe the shares using the words halves, fourths, and quarters, and use the phrases half of, fourth of, and quarter of. Describe the whole as two of, or four of the shares. Understand for these examples that decomposing into more equal shares creates smaller shares.

Comments: Probably premature, certainly marginal. Unnecessarily aggressive.

MACC.1.MD.1.1 Measure lengths indirectly and by iterating length units - Order three objects by length; compare the lengths of two objects indirectly by using a third object.

Comments: Transitive (indirect) comparison is premature and inappropriate.

MACC.1.MD.2.3 Tell and write time - Tell and write time in hours and half-hours using analog and digital clocks.

Comments: Missing reference to am/pm.

MACC.1.NBT.1.1 Extend the counting sequence - Count to 120, starting at any number less than 120. In this range, read and write numerals and represent a number of objects with a written numeral.

Comments: Should be to 100. The wrong-headed requirement of 100 in Kindergarten forced this senseless “120” value here.

MACC.1.NBT.3.4 Place value understanding and properties of operations to add and subtract - Add within 100, including adding a two-digit number and a one-digit number, and adding a two-digit number and a multiple of 10, using concrete models or drawings and strategies based on place value, properties of operations, and/or the relationship between addition and subtraction; relate the strategy to a written method and explain the reasoning used. Understand that in adding two-digit numbers, one adds tens and tens, ones and ones; and sometimes it is necessary to compose a ten.

Comments: Ill-defined standard open to multiple interpretations that sends mixed signals. Unclear what those “strategies based on place value, properties of operations, and/or the relationship between addition and subtraction” are. Further, if a “written method” (whatever it is) is known, why the need for those strategies? Finally, no reason to limit to a two-digit number and one-digit number if one truly expects understanding that in “adding two-digit numbers, one adds tens and tens, ones and ones; and sometimes it is necessary to compose a ten.”

MACC.1.OA.3.6 Add and subtract within 20 - Add and subtract within 20, demonstrating fluency for addition and subtraction within 10. Use strategies such as counting on; making ten (e.g., $8 + 6 = 8 + 2 + 4 = 10 + 4 = 14$); decomposing a number leading to a ten (e.g. $13 - 4 = 13 - 3 - 1 = 10 - 1 = 9$); using the relationship between addition and subtraction (e.g. knowing that $8 + 4 = 12$, one knows $12 - 8 = 4$); and creating equivalent but easier or known sums (e.g., adding $6 + 7$ by creating the known equivalent $6 + 6 + 1 = 12 + 1 = 13$).

Comments: Insists on pedagogy that is appropriate for mental math but inappropriate, awkward, and constraining for written math. This standard belongs to Kindergarten. Instead, the standards should call on committing addition facts up to 20 to memory in this grade, like Singapore does in grade 1.

MACC.2.MD.3.8 Work with time and money - Solve word problems involving dollar bills, quarters, dimes, nickels, and pennies, using \$ and ¢ symbols appropriately.

Comments: Grade 2 is too late to start with money and build on children natural curiosity and their familiarity with money. It is a grade 1 standard in Singapore. In grade 2 it should include “combinations of dollar bills, quarters, dimes, nickels, and pennies” like Singapore grade 2 does.

English Language Arts Standards

I concur with the concerns of child psychologist Dr. Megan Koschnick⁵⁹ regarding this set of English standards and sub-standards and offer my own comments:

CCSS.ELA-Literacy.SL.K.1 Participate in collaborative conversations with diverse partners about *kindergarten topics and texts* with peers and adults in small and larger groups.

CCSS.ELA-Literacy.SL.K.1a Follow agreed-upon rules for discussions (e.g., listening to others and taking turns speaking about the topics and texts under discussion).

CCSS.ELA-Literacy.SL.K.1b Continue a conversation through multiple exchanges.

Comment: Asking children this young to behave like little adult corporate board members is completely inappropriate, especially when many adults have not mastered these non-cognitive workforce based competencies. (Effrem)

CCSS.ELA-Literacy.SL.1.1b Build on others' talk in conversations by responding to the comments of others through multiple exchanges.

Comment: This has the same problem as the set of standards mentioned just above.

I also concur with the developmental concerns of Dr. Sandra Stotsky who raised concerns about the following standards and benchmarks and whose comments I reproduce here, as well as note my own:

CCSS.ELA-Literacy.L.K.4b Use the most frequently occurring inflections and affixes (e.g., *-ed, -s, re-, un-, pre-, -ful, -less*) as a clue to the meaning of an unknown word.

Comment: Dr. Stotsky rightly points out that kindergarten students especially would not be able to achieve this benchmark because they are not reading yet and because they do not learn word meaning from affixes, but rather by context.

LACC.K.RL.2.4 Ask and answer questions about unknown words in a text.

Comment: How do you compel a kindergartner to ask a question about an unknown word? (Stotsky)

LACC.1.RL.2.5 Explain major differences between books that tell stories and books that give information, drawing on a wide reading of a range of text types.

Comment: In grade 1? (Stotsky) First grade students have not been exposed to that many text types as they are still learning to read. (Effrem)

LACC.3.RL.2.6 Distinguish their own point of view from that of the narrator or those of the characters.

Comment: This is extraordinarily subjective and would be difficult for third grade students to understand, much less fulfill. (Effrem)

LACC.2.RI.1.3 Describe the connection between a series of historical events, scientific ideas or concepts, or steps in technical procedures in a text.

⁵⁹ <http://www.youtube.com/watch?v=vrQbJImVJZo&feature=youtu.be>

Comment: This is not a standard, and it is not an activity for second graders. (Stotsky) Children at this age would not have this type of knowledge to be able to carry this out and would be unnecessarily stressed if forced to do so. (Effrem)

LACC.2.RI.3.8 Describe how reasons support specific points the author makes in a text.

Comment: Doesn't make sense. Describe HOW reasons support something? This is metalinguistic, not for grade 2 (Stotsky)

ACC.3.RL.3.7 Description: Explain how specific aspects of a text's illustrations contribute to what is conveyed by the words in a story (e.g., create mood, emphasize aspects of a character or setting).

Comment: This is inappropriate in grade 3. They should be well past looking at a story's illustrations for information by now (for a test). (Stotsky)

LACC.910.RI.1.3 Analyze how the author unfolds an analysis or series of ideas or events, including the order in which the points are made, how they are introduced and developed, and the connections that are drawn between them.

Comment: Dr. Stotsky notes that this is "a standard that most grade 9 students can't do."

I also concur with Professor Joanna Yatvin, an adjunct professor and supervisor of student teachers at the Portland State University Graduate School of Education, Portland, Ore., and is a past president of the National Council of Teachers of English (NCTE). She had numerous concerns regarding the lack of developmental appropriateness of several English standards:⁶⁰

RI.4.4 - Determine the meaning of words and phrases as they are used in a text, including those that allude to significant characters found in mythology (e.g., Herculean).

Comment: "I can't help wondering how 9- and 10-year-olds are supposed to do their "determining." Competent, engaged readers of any age do not stop to puzzle out unknown words in a text. Mostly, they rely on the surrounding context to explain them. But, if that doesn't work, they skip them, figuring that some- where down the page they will be made clear."

RI.5.5 Compare and contrast the overall structure (e.g., chronology, comparison, cause/effect, problem/solution) of events, ideas, concepts, or information in two or more texts.

Comment: "For 5th graders, this standard would be even more difficult to meet than the previous one because it asks them to carry out two different operations on two or more texts that almost certainly differ in content, style, and organization."

L.K.1 (When speaking) Produce and expand complete sentences in shared language activities.

Comment: "Most of the kindergartners I know have no idea what the term "complete sentence" means. Children and adults commonly speak short phrases and single words to each other. I can't imagine any kindergarten teacher insisting during a group language activity that children speak in "complete sentences" or that they "expand" their sentences. Those directions would in all likelihood end the activity quickly as most children fell silent."

⁶⁰ Joanne Yatvin - Warning: The Common Core standards may be harmful to children – Phi Delta Kappan, March 2013

Appendix B - Psychologically Based/Socioemotional/Sociocultural Standards

CCSS.ELA-Literacy.RL.K.10 Actively engage in group reading activities with purpose and understanding.

Comment: This standard requires a subjective psychological assessment on the part of the teacher to know if a child is reading with purpose and understanding. Purpose and understanding are both subjective terms.

ELA Literacy.L.3.5c Distinguish shades of meaning among related words that describe states of mind or degrees of certainty (e.g. knew, believe, suspected, heard, wondered)

Comment: This requires abstract thinking and knowing children's state of mind, others' states of mind and applying it to the meanings of various words. According to Piaget, children are not really capable of abstract thinking until eleven or twelve years of age. Knowing states of mind is quite a subjective endeavor at any age.

CCSS.ELA-Literacy.W.2.3 Write narratives, in which they recount a well-elaborated event or short sequence of events, include details to describe actions, thoughts, and feelings, use temporal words to signal event order, and provide a sense of closure.

Comment: Admitted by Nancy Orme of Anchorage School District to correspond to socioemotional learning standards for "Self-Awareness" that require students to "demonstrate awareness of their emotions;" "recognize and label emotions/feelings;" and "describe their emotions and feelings and the situations that cause them (triggers)."⁶¹

CCSS.ELA-Literacy.SL.1.4 - Describe people, places, things, and events with relevant details, expressing ideas and feelings clearly.

Comment: This is another standard that deals with subjective feelings and would fall, as discussed by the Alaskan official above into the socioemotional category.

CCSS.ELA-Literacy.W.3.3b - Use dialogue and descriptions of actions, thoughts, and feelings to develop experiences and events or show the response of characters to situations.

Comment: This is the yet another skill that demands subjective discussion of feelings as discussed above.

CCSS.ELA-Literacy.W.3.3d -Provide a sense of closure

Comment: Providing a sense of closure is another subjective effort requiring opinions from both student and teacher.

CCSS.ELA-Literacy.SL.K.1 Participate in collaborative conversations with diverse partners about *kindergarten topics and texts* with peers and adults in small and larger groups.

Comment: This completely developmentally inappropriate national standard (See Appendix B also) requires multiple subjective and potentially politically correct personal opinions on the part of the teacher, such as who constitutes diverse partners, whether a conversation is collaborative or not, and what constitutes a "kindergarten topic." These personal opinions are likely to be enforced by subjective assessments such as the Common Core aligned curriculum *Voices* discussed above in Kindergarten or the federally funded, federally supervised national tests, PARCC and SBAC for older grades.

⁶¹ Pamela Orme, Anchoage, School District, social studies curriculum coordinator, Social Emotional Learning in Common Core State Standards - <http://www.youtube.com/watch?v=ZZMhn-9SRoA> starting at 1:23.

LACC.910.RL.2.6 Analyze a particular point of view or cultural experience reflected in a work of literature from outside the United States, drawing on a wide reading of world literature

Comment: This national standard will be based on personal opinion and will most likely result in politically correct multiculturalism and cultural equivalence as enforced by the psychosocially based assessments in Common Core aligned in curriculum in younger grades or in federally funded, federally supervised national tests like PARCC and SBAC, or other Common Core aligned national tests for older students.

CCSS.ELA-Literacy.RL.2.2 Recount stories, including fables and folktales from diverse cultures, and determine their central message, lesson, or moral.

Comment: This is extremely subjective with much room for sociopolitical indoctrination depending on the point of view of the teacher or what is expected on the federally funded, federally supervised Common Core aligned national tests.

CCSS.ELA-Literacy.RL.2.9 Compare and contrast two or more versions of the same story (e.g., Cinderella stories) by different authors or from different cultures.

Comment: This is another subjective national standard that is vulnerable for politically correct multicultural or culturally equivalent interpretation as discussed for Standard Literacy.RL.2.2.

CCSS.ELA-Literacy.RL.3.2 Recount stories, including fables, folktales, and myths from diverse cultures; determine the central message, lesson, or moral and explain how it is conveyed through key details in the text.

Comment: This is another subjective national standard that is vulnerable for politically correct multicultural or culturally equivalent interpretation as discussed for Standard Literacy.RL.2.2.

CCSS.ELA-Literacy.RL.4.9 Compare and contrast the treatment of similar themes and topics (e.g., opposition of good and evil) and patterns of events (e.g., the quest) in stories, myths, and traditional literature from different cultures.

Comment: This is another subjective national standard that is vulnerable for politically correct multicultural or culturally equivalent interpretation as discussed for Standard Literacy.RL.2.2.

CCSS.ELA-Literacy.RL.5.2 Determine a theme of a story, drama, or poem from details in the text, including how characters in a story or drama respond to challenges or how the speaker in a poem reflects upon a topic; summarize the text.

Comment: This national standard, enforced by the federally funded, federally supervised national tests, again calls for personal opinion that is likely to be open to politically correct interpretation.

CCSS.ELA-Literacy.RL.5.7 Analyze how visual and multimedia elements contribute to the meaning, tone, or beauty of a text (e.g., graphic novel, multimedia presentation of fiction, folktale, myth, poem).

Comment: Aside from the fact that there is no guidance given for how to choose the multimedia elements in this national standard, the interpretation of “meaning, tone, and beauty” is entirely subjective and requires personal opinion on the part of the student and teacher that is open to politically correct interpretation enforced by the federally funded, federally supervised national tests like PARCC, which is still under consideration by the state of Florida, and SBAC.

CCSS.ELA-Literacy.CCRA.W.5 Develop and strengthen writing as needed by planning, revising, editing, rewriting, or trying a new approach.

Comment: This standard has been acknowledged by an educator based on criteria from the Collaborative for Academic Social and Emotional Learning (CASEL) to be a psychosocial skill that teaches “Self-Awareness/Management” and “focuses on identifying and recognizing emotions; self-efficacy; control of oneself; self-motivation and discipline; goal setting; and organizational skills.” Are parents sending their children to school to be psychologically trained or to be educated? The Common Core standards are portrayed to be all about academic rigor, not about subjective, psychosocial skills.

CCSS.ELA-Literacy.CCRA.L.3 - Apply knowledge of language to understand how language functions in different contexts, to make effective choices for meaning or style, and to comprehend more fully when reading or listening.

Comment: This standard has been acknowledged by an educator based on criteria from the Collaborative for Academic Social and Emotional Learning to be a psychosocial skill teaching “Social_Awareness; empathy; difference recognition; and respect for others.” It is not the job of government schools using national standards to set the norms for and to do this psychological training, and certainly not without a frank discussion with parents and consent.

CCSS.ELA-Literacy.RL.7.9 Compare and contrast a fictional portrayal of a time, place, or character and a historical account of the same period as a means of understanding how authors of fiction use or alter history.

Comment: This assumes that the student has had adequate teaching in history to be able to understand the difference between history and historical fiction, which may or may not have been received at this level and may or may not have been received in an English class. Much of this is subjective personal opinion open to interpretation. Because the testing is so high stakes, teachers and districts will most likely choose curriculum that matches the federal model curriculum, which Florida has not rejected; the Common Core text exemplars, which districts may still use even after the State Board of Education’s decision; and the federally funded and supervised national tests.

LACC.910.RL.3.7 Analyze the representation of a subject or a key scene in two different artistic mediums, including what is emphasized or absent in each treatment (e.g., Auden’s “Musée des Beaux Arts” and Breughel’s Landscape with the Fall of Icarus)

Comment: This standard is extremely subjective with no criteria for doing this analysis, leaving issues open to the whim of the sociocultural views of what is required by the teacher or on the federally funded, federally supervised Common Core aligned national tests like PARCC and SBAC.

LACC.910.RI.3.9 Analyze seminal U.S. documents of historical and literary significance (e.g., Washington’s Farewell Address, the Gettysburg Address, Roosevelt’s Four Freedoms speech, King’s “Letter from Birmingham Jail”), including how they address related themes and concepts.

Comment: Not only is this incoherent as an English standard, but having the students “analyze related themes and concepts” without any guidance again leaves a wide opening for politically correct interpretation and direction based on the federally funded and supervised national Common Core aligned assessments like PARCC that and Florida continues to consider and SBAC or other national tests like ACT which admits plans to do “assessment of behavioral skills.” For example, model curriculum for the Gettysburg Address requires teachers to teach that seminal document by “cold reading,” meaning without context in order to “level the playing field.”⁶²

LACC.1112.RL.1.3 Analyze the impact of the author’s choices regarding how to develop and relate elements of a story or drama (e.g., where a story is set, how the action is ordered, how the characters are introduced and developed).

Comment: Requiring students to “analyze the impact” calls for a personal opinion that is subject to what the teacher wants or will be taught to the federal model curriculum for PARCC or SBAC or to whatever national test aligned to the Common Core tests is chosen.

LACC.1112.RL.2.4 Determine the meaning of words and phrases as they are used in the text, including figurative and connotative meanings; analyze the impact of specific word choices on meaning and tone, including words with multiple meanings or language that is particularly fresh, engaging, or beautiful. (Include Shakespeare as well as other authors.)

Comment: According to nationally renowned English standards expert, Dr. Sandra Stotsky, “Here again, we are dealing with personal response. First, students are to determine word meanings in a text. Then they are to analyze their personal responses to specific words in the text, with (for some unknown reason) attention to words with multiple meanings. Why Shakespeare is to be included, we also don’t know.”⁶³ This is another very subjective standard that requires personal responses. How is a student to know what the standard is for “fresh, engaging, or beautiful”?

LACC.1112.RL.2.5 Analyze how an author’s choices concerning how to structure specific parts of a text (e.g., the choice of where to begin or end a story, the choice to provide a comedic or tragic resolution) contribute to its overall structure and meaning as well as its aesthetic impact.

Comment: This is another subjective standard calling for interpretation of the author’s personal choice and opinion and the personal opinion of the reader, again open to politically correct opinion of the curriculum or what will be on the national tests.

LACC.1112.RI.1.1 Description: 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 matters uncertain.

Comment: This so-called standard being imposed on Florida and 44 other states requires personal opinion from both the student and the teacher. The criteria for “strong and thorough” textual evidence will be determined by the federally funded, federally supervised national tests, PARCC and SBAC, the former of which Florida is still considering.

⁶² See http://www.washingtonpost.com/blogs/answer-sheet/post/teacher-one-maddening-day-working-with-the-common-core/2012/03/15/gIQA8J4WUS_blog.html

⁶³ See Dr. Stotsky’s full comments for Florida’s Common Core standards at <http://www.flstopccoalition.org/files/3B2497D3-41D5-4AD3-A4D5-53948BCAB7C1--BF365081-6DE8-45DC-A6F5-B05E63383795/comments-on-florida-ela-standards-3.pdf?lc=10162013085507>, p. 42

LACC.1112.RI.2.5 Analyze and evaluate the effectiveness of the structure an author uses in his or her exposition or argument, including whether the structure makes points clear, convincing, and engaging.

Comment: The only way to determine the “effectiveness of the structure” and whether that structure is “clear, convincing, and engaging” is by subjective personal opinion. The decision about whether a student has adequately carried out this national standard will be by the federally funded, federally supervised national test like PARCC or SBAC or some other national test like ACT plans to do “behavioral assessment.”

LACC.1112.RI.2.6 Determine an author’s point of view or purpose in a text in which the rhetoric is particularly effective, analyzing how style and content contribute to the power, persuasiveness or beauty of the text.

Comment: This national standard requires more personal opinion, the interpretation of which will be enforced by federally funded, federally supervised national tests and federally funded model curriculum and even the official text exemplars of the Common Core standards that districts are still free to use, even though the State Board of Education no longer requires their use statewide.

CCSS.ELA-Literacy.RH.6-8.2 - Determine the central ideas or information of a primary or secondary source; provide an accurate summary of the source distinct from prior knowledge or opinions.

Comment: This is subjective and requires information a student may or may not receive in an English class plus the interpretation of the teacher who must teach to the federally funded and supervised national tests and may still use the Common Core official text exemplars or the federally funded model curriculum that is accompanying the federally funded, federally supervised national tests, PARCC and SBAC, the former of which is still under consideration in Florida.

CCSS.ELA-Literacy.RH.6-8.6 - Identify aspects of a text that reveal an author’s point of view or purpose (e.g., loaded language, inclusion or avoidance of particular facts).

Comment: How a student will accomplish this national standard without subjective, personal opinion on their part or that of the teacher, who may be teaching to scripted curriculum, such as the SpringBoard curriculum described above that is open to politically correct interpretation, is not easily discernible.

CCSS.Math.Practice.MP1 Make sense of problems and persevere in solving them.

Comment: Admitted by an educator based on CASEL criteria to be a psychosocial skill for “Responsible Decision Making” that “includes problem identification and problem solving; evaluation and reflection; personal, social, and ethical responsibility.” This is also admitted by a US Department of Education to be a “non-cognitive,” “21st Century” skill. So, if a student fails the questions related to this subjective national standard on a federally funded, federally supervised national test such as PARCC, which is still under consideration in Florida, or some other national test like ACT that will be doing “behavioral assessment,” will that data in their permanent data file to be seen by employers and colleges and who knows who else show that they are not personally, socially, and ethically “responsible”?