

## Concerns about Competency Based Education

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Competency Based Education (CBE) is a slick new name for computerized education that teaches lower level workforce training and psychological/behavioral skills. These programs should be opposed for many reasons. Here is a list of the most prominent ones (emphasis is added):

### Subjectivity

The lack of agreed upon definition:

One of the leading groups in the competency based education movement, Competency Works<sup>1</sup>, requested comments on the definition of competency based education or CBE on its website, because the **definition is still a “work in progress.”**

How can the districts involved submit an application as required in HB 1365<sup>2</sup> starting on lines 31 and 32 that includes “a vision and timeline for a competency based education program” if there is no standard definition of the program?

Subjectivity of program elements:

Another part of that same Competency Works website<sup>3</sup> said that one of the key elements of a CBE program that seemed to be agreed upon is – “Learning outcomes emphasize competencies that include application and creation of knowledge, along with the development of important skills and dispositions.”

- Why the emphasis on skills instead of broad based academic knowledge children can use to choose whatever career or academic path they want to pursue?
- What about regular foundational subject knowledge, before going on to applied knowledge, whatever that means?
- What about dispositions? Isn't that entering the non-academic, psychological realm?
- Who decides which dispositions are taught or what they each mean or which ones a certain child needs?
- How are issues of consent handled as to the psychological profiling that teaching and assessing dispositions would entail?
- What data regarding these dispositions are kept in a child's life-long electronic portfolio?

<sup>1</sup> <http://competencyworks.pbworks.com/w/page/67945372/Detailed> Definition of Competency Education

<sup>2</sup> <http://flsenate.gov/Session/Bill/2016/1365/BillText/c2/PDF>

<sup>3</sup> <http://competencyworks.pbworks.com/w/page/66734498/Welcome> to the CompetencyWorks Wiki

While this is a pilot project that has been called voluntary during committee discussion, the parents of the children in the affected districts deserve to have answers to these and many other questions before jeopardizing their children's privacy and futures and more hard earned tax dollars that will be necessary beyond any grant funds are spent on this potentially very ill-advised program that makes guinea pigs out of their children. In addition the language of the senate bill<sup>4</sup> states that the plan districts submit to the Department of Education are to include "A vision for the pilot program, including a timeline for the program and the timeframe for districtwide [sic] implementation of competency-based education," indicating that they do not even want to wait for the results of the pilot

### **Harm to the Teacher-Student Interaction:**

CBE shifts teaching from a warm personal interaction between teacher and student to de-personalized learning, constant assessment, and data gathering via computers. The problems with this approach are many and include:

- Conversion of teachers from respected professional to mere computer proctors and baby sitters
- Narrowing of curriculum to what can be digitized and sadly for our students and taxpayers, monetized to be profitable for large corporations like Microsoft and Pearson that stand to reap huge profits
- No evidence that either teaching or assessing online works and some evidence that it does not given the recent news that PARCC assessment scores were lower for those students taking the tests on computers<sup>5</sup> than those taking them on paper. We are also all aware<sup>6</sup> of the many significant technical problems with AIR in Florida<sup>7</sup> and numerous other states.
- There is also likely to be little change in the overuse of data and testing for teacher "accountability" decisions for tenure and pay
- Inability of the parent or teacher to actually see the curriculum or assessments because everything is online

### **Over-Reliance on Technology and Unhelpful Foundation Grants**

- Extraordinary expense at the sacrifice of other very pressing needs of schools
  - This pilot is funded by the Bill and Melinda Gates Foundation<sup>8</sup> that also gave \$100 million to Hillsborough County to reform teacher evaluation and pay with the county required to bring in additional \$100 million, but the county's cost rose to \$124 million and the program is being dismantled after largely failing.
    - "More than \$23 million of the Gates money went to consultants."
    - "Millions of dollars were pledged to parts of the program that educators now doubt. After investing in an elaborate system of peer evaluations to improve teaching, district leaders are considering a retreat from that model. And Gates is withholding \$20 million after deciding it does not, after all, favor the idea of teacher performance bonuses — a major change in philosophy."
  - Los Angeles wasted \$1.3 billion on iPads<sup>9</sup> for every student that were to be loaded with Pearson Common Core curriculum that were utterly unusable resulting in FBI investigations for bid rigging.
  - Baltimore is embarking on a similarly misguided \$270 million endeavor<sup>10</sup> where the superintendent took a consulting job with a related company after awarding that company a large contract

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<sup>4</sup> <http://flsenate.gov/Session/Bill/2016/1714/BillText/c1/PDF>, lines 39-41

<sup>5</sup> <http://www.edweek.org/ew/articles/2016/02/03/parcc-scores-lower-on-computer.html?intc=main-cablogde>

<sup>6</sup> <http://www.flstopccoalition.org/blog/alice-wonderland-validity-study-fsa-valid-except-not.htm>

<sup>7</sup> [https://feaweb.org/\\_data/files/2015\\_DOE/FSA\\_Validity\\_Study/FSA-Final-Report\\_08312015.pdf](https://feaweb.org/_data/files/2015_DOE/FSA_Validity_Study/FSA-Final-Report_08312015.pdf)

<sup>8</sup> <http://www.tampabay.com/news/education/k12/sticker-shock-how-hillsborough-countys-gates-grant-became-a-budget-buster/2250988>

<sup>9</sup> <http://www.wired.com/2015/05/los-angeles-edtech/>

<sup>10</sup> <http://emilytalmage.com/2016/02/08/baltimore-county-public-schools-used-in-270-million-dollar-tech-experiment/>

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## Digital Badges

Here is an excellent explanation of digital badges<sup>14</sup> written by Cheri Kiesecker, researcher for the Parent Coalition for Student Privacy<sup>15</sup> and how they fit into the School to Work System described in the infamous 1992 letter<sup>16</sup> from Marc Tucker of the National Center for Education and the Economy to Hillary Clinton that envisions a plan to **"to remold the entire American system" into "a seamless web that literally extends from cradle to grave and is the same system for everyone," coordinated by "a system of labor market boards at the local, state and federal levels" where curriculum and "job matching" will be handled by counselors "accessing the integrated computer-based program."**

- Dear schools and parents, forget grades, we'll soon have corporate sponsors and badges to label your kids, help **predict** their workforce or college future. Take a look at the members listed in this newly created badging collaborative<sup>17</sup>, funded by Lumina in partnership with NGA, Pearson, Broad, Walton, Exxon and Business Round Table, etc. They, along with the folks participating in the October 2015 Close It Summit<sup>18</sup> want to know how your children feel, how your children think, so they can "predict workplace success" and close those pesky workforce gaps, with a corporate endorsed data badge. WHY? because education is not about teaching children anymore. Exxon reminds us that schools are job suppliers, **children are products**<sup>19</sup>. [Tillerson goes on to say that children not educated the Common Core way are **"defective" products.**]

*Meet Digital badges: ranking and sorting children as products, endorsed by businesses, branding children, and starting in kindergarten (sometimes preschool).* Digital badging is linked with Competency Based Education (CBE) now part of the new ESSA<sup>20</sup>, and is mentioned in the White House testing plan<sup>21</sup>. Why is the National Governor's Association (NGA) urging states to introduce bills, to change education policy,<sup>22</sup> making way for schools as factory workforce talent pipelines<sup>23</sup>, allowing businesses to dictate K-16 curriculum<sup>24</sup> then shop for, groom and cherry-pick (endorse) our children? It's all about the data<sup>25</sup>, and that data will be delivered via Digital Badges.

<sup>11</sup> <http://www.edweek.org/ew/articles/2016/02/03/parcc-scores-lower-on-computer.html?intc=main-cablogde>

<sup>12</sup> <http://www.flstopccoalition.org/blog/alice-wonderland-validity-study-fsa-valid-except-not>

<sup>13</sup> [https://feaweb.org/\\_data/files/2015\\_DOE/FSA\\_Validity\\_Study/FSA-Final-Report\\_08312015.pdf](https://feaweb.org/_data/files/2015_DOE/FSA_Validity_Study/FSA-Final-Report_08312015.pdf)

<sup>14</sup> <http://missourieducationwatchdog.com/breaking-laws-or-breaking-children-a-list-of-data-and-the-laws/>

<sup>15</sup> <http://www.studentprivacymatters.org/>

<sup>16</sup> [http://www.eagleforum.org/educate/marc\\_tucker/](http://www.eagleforum.org/educate/marc_tucker/)

<sup>17</sup> <http://www.credentialtransparencyinitiative.org/about-us/Collaborative.aspx>

<sup>18</sup> <https://drive.google.com/file/d/0B7epgdVXe0gKeWYxUmktMTZ1MnM/view?usp=sharing>

<sup>19</sup> <http://fortune.com/common-core-standards/>

<sup>20</sup> <http://www.ed.gov/ESSA>

<sup>21</sup> <http://emilytalmage.com/2015/10/25/suspicious-confirmed-testing-action-plan-is-trojan-horse/>

<sup>22</sup> <http://www.nga.org/files/live/sites/NGA/files/pdf/2015/1510ExpandingStudentSuccess.pdf>

<sup>23</sup> <http://ladyliberty1885.com/2015/10/10/how-you-kill-education-in-the-united-states-merge-dol-and-doe/>

<sup>24</sup> [https://www.colorado.gov/pacific/sites/default/files/atoms/files/B\\_2015-004\\_BEELC\\_0.pdf](https://www.colorado.gov/pacific/sites/default/files/atoms/files/B_2015-004_BEELC_0.pdf)

<sup>25</sup> <http://gettingsmart.com/2015/05/the-end-of-the-big-test-moving-to-competency-based-policy/>

**What's a digital badge? (AKA data badge, merit badge, badge credential, competency based badge)**  
“Badges identify skills that businesses deem the most desirable, skills they think will predict a child’s future success,<sup>26</sup>” based on data. “Top companies, like McKinsey and Goldman Sachs, see this as a way to recruit...without having to physically go to campus.” Data badges are portable data, uploaded to the internet, via a badging company, affiliated with a corporate partner. The data is personally identifiable. It is “evidence” of a skill acquired, A COMPETENCY, and is **often in the form of personal essays or videos and photos of students completing a task.** The uploaded video and pictures can be easily data mined using facial and emotional algorithms<sup>27</sup>. And once uploaded, data are nearly impossible to track and delete, becoming a potential Pandora’s Box, and amassing a huge profile of very personal information out in the cloud. Keep in mind that Student Data is a multi-billion dollar per year market.

## Data Mining

There are many reasons to be concerned about the proliferation of competency based education programs that are piloted in this bill, but the lynchpin, closely related to the digital badges cited above, is the loss of privacy via constant data mining and sharing with third party vendors and the federal government without parental or student consent.

- **Workforce Data Quality Initiative (WDQI) Grant Information<sup>28</sup>**

“In 2010, the U.S. Department of Labor (DOL) launched round one of WDQI to fund the development, or enhancement, of state workforce longitudinal administrative databases. ***These state longitudinal databases will, at a minimum, include information on programs that provide training and employment services and will be linked longitudinally at the individual level to allow for analysis*** leading to enhanced opportunity for program evaluation and better information for customers and stakeholders of the workforce system.

WDQI funding is made available through competitive grants administered by DOL in support of a parallel and much larger effort, the Statewide Longitudinal Data System (SLDS) grants administered by the U.S. Department of Education. ***These two programs encourage the development of state education and workforce longitudinal administrative databases. Ultimately, databases developed through WDQI should be linked to education data at the individual level.*** Collecting these and other data sources longitudinally will provide a comprehensive picture of workers' earnings throughout their careers. Through analysis, these data will demonstrate the relationship between education and training programs, as well as the additional contribution of the provision of other employment services.”

- The CEO of ed-tech corporation Knewton<sup>29</sup> said at a data seminar that education is the most data mineable industry there is by far and bragged at a seminar “***Knewton today gets 5 to 10 million actionable data [points] per student per day.***”
- The US Office of Educational Technology<sup>30</sup> describes how educational data-mining works:
  - “... professionals develop methods and ***apply techniques from statistics, machine learning, and computer science to analyze data collected during teaching and learning.*** EDM can be used to test learning theories and inform educational practice.”

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<sup>26</sup> <http://eddesignlab.org/2015/06/are-badges-college-ready/>

<sup>27</sup> <http://singularityhub.com/2014/01/19/with-emotion-recognition-algorithms-computers-know-what-youre-thinking/>

<sup>28</sup> <https://www.doleta.gov/performance/workforcedatagrants09.cfm>

<sup>29</sup> <https://www.youtube.com/watch?v=Lr7Z7ysDluQ>

<sup>30</sup> <http://tech.ed.gov/wp-content/uploads/2014/11/Expanding-Evidence.pdf>

- That report shows the focus is on behavior and psychosocial parameters<sup>31</sup> instead of academic knowledge. “During development of an innovative learning resource, educational data mining and learning analytics can uncover patterns of learner behavior that can be used to guide improvement.”
- They also admit that they are combining this data with other extremely sensitive social and family data<sup>32</sup>:
  - “The chapter discusses how combining data from different agencies permits analyzing information on achievement, attendance, and other indicators of school success with information on students’ involvement in social services such as the juvenile justice system, the foster care system, and youth development programs to create early warning systems for identifying at-risk students.”
- The report<sup>33</sup> also confirms that third party vendors have access to this sensitive educational and behavioral data reeking of corporate cronyism
  - “For example, educational data mining combines conventional and new learning analytics in ways **that make them useful for big data**”
- The report<sup>34</sup> admits concerns over validity of this kind of data mining that ends up in a child’s life long record saying, “The key evidence challenge is establishing the external validity of the “signal” provided by technology.”
- Privacy is endangered because the federal student privacy law, which is the law upon which Florida’s privacy law is based<sup>35</sup> (see lines 26-32) is 40 years old and has been gutted by the Obama administration, now containing regulations that allow sharing individual student data<sup>36</sup> with third party vendors and the federal government without parental consent.
- Finally, the US House Committee on Oversight and Government Accountability has uncovered in two recent hearings (HERE<sup>37</sup> and HERE<sup>38</sup>) the appalling lack of data security for student data in the US Dept. of Education.

## Psychological Manipulation and Profiling

### In Digital Badges and CBE

- [Digital] “Badges can be given for the kinds of competencies that are essential in real-world work and community that are seldom formally assessed or recognized within the school system.” (Expanding Evidence Approaches for Learning in a Digital World<sup>39</sup>) -These are subjective psychosocial and non-academic workforce skills instead of foundational academic knowledge.
- In addition, the American School Counselors Association<sup>40</sup> said, “**Mindsets & Behaviors align with specific standards from the Common Core State Standards through connections at the competency level.**”

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<sup>31</sup> Ibid

<sup>32</sup> Ibid

<sup>33</sup> Ibid

<sup>34</sup> Ibid

<sup>35</sup> <http://flsenate.gov/Session/Bill/2014/0188/BillText/er/PDF>

<sup>36</sup> <http://edlibertywatch.org/2014/01/formal-response-to-the-chief-state-school-officers-letter-on-student-data-privacy/>

<sup>37</sup> <https://oversight.house.gov/hearing/u-s-department-of-education-information-security-review/>

<sup>38</sup> <https://oversight.house.gov/hearing/u-s-department-of-education-investigation-of-the-cio/>

<sup>39</sup> <http://tech.ed.gov/wp-content/uploads/2014/11/Expanding-Evidence.pdf>

<sup>40</sup> <https://www.schoolcounselor.org/magazine/blogs/november-december-2014/change-behaviors-by-changing-mindsets>

- Businesses want to know your child’s non-cognitive, behavioral, social emotional, 21st century “soft skills”. ***These skills are difficult –if not impossible to accurately quantify — behavioral “skills” such as awareness, advocacy, leadership, life-long learner, critical thinker.*** [Though there are many problems with this type of behavioral labeling<sup>41</sup>], the badges are presented to children as prizes, embracing the current push of gamification<sup>42</sup> (uploading and sharing your personal data is fun! and profitable for businesses!). You can visit one school’s website to see video of 10 and 11 year olds<sup>43</sup> explaining how they upload videos of themselves to win these badges. This particular school district is piloting badges district-wide, starting in preschool.<sup>44</sup> (Kiesecker<sup>45</sup> – emphasis in original)

The Office of Educational Technology of the US Department of Education put out a follow-up report to their infamous Grit, Tenacity and Perseverance Report<sup>46</sup> titled *Expanding Evidence Approaches for Learning in a Digital World*<sup>47</sup> that discusses the efforts to expand digital and competency based learning indicates that psychosocial manipulation is prominent. They say:

- Another example of groundbreaking work in building adaptive learning systems involves ***measuring and responding to motivational and affective factors as students work with digital learning systems.***
- The way the federal government hopes to deal with that issue is to use ***“Adaptations based on students’ emotional states and levels of motivation.”***

And the National Association of State Boards of Education<sup>48</sup> said, ***“Various elements of [social emotional learning] 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.”***

These parameters are extremely subjective and there is difficulty in defining them even among experts:

- Yet, even experts on social emotional learning and mindsets in education say that measures to assess them are very problematic. For example, Angela Duckworth, one of the leading social scientists in this area has said of these assessments, “perfectly unbiased, unfakeable [sic], and error-free measures are an ideal, not a reality.”<sup>49</sup>
- There is still no agreement about the meaning of these parameters or even their selection by experts over a period of ten years:

Challenges Involved in Infant and Early Childhood Diagnosis

“Diagnostic classifications for infancy are still being developed and validated...”

“Lack of longitudinal outcome studies”

***“Broad parameters for determining socioemotional outcomes are not clearly defined”***

(National Center for Infant and Early Childhood Health Policy<sup>50</sup> (Emphasis added)

<sup>41</sup> <http://edlibertywatch.org/wp-content/uploads/2015/06/Child-Mental-health-Quotes-and-references1.pdf>

<sup>42</sup> <https://www.salesforce.com/blog/2014/01/gamification-big-data-gp.html>

<sup>43</sup> <https://www.youtube.com/watch?v=XDSH3Fhq8qY&feature=youtu.be>

<sup>44</sup> <http://co.chalkbeat.org/2015/06/22/digital-merit-badges-coming-to-aurora-public-schools/#.VjwUYf-FM5s>

<sup>45</sup> <http://missourieducationwatchdog.com/the-business-of-badging-and-predicting-childrens-futures/>

<sup>46</sup> <http://www.flstopccoalition.org/files/F6A22756-73E4-4406-BC0F-F9E8340A37C6--E36F73DA-E434-44F5-B829-1C27BAA8532F/grit-tenacity-and-perseverance-feb-2013-doe.pdf>

<sup>47</sup> <http://tech.ed.gov/wp-content/uploads/2014/11/Expanding-Evidence.pdf>

<sup>48</sup> <http://www.nasbe.org/wp-content/uploads/FPP-Social-Emotional-Learning.pdf>

<sup>49</sup> [http://blogs.edweek.org/edweek/rulesforengagement/2015/05/grit\\_accountability\\_noncognitive\\_skills\\_duckworth\\_veager.html](http://blogs.edweek.org/edweek/rulesforengagement/2015/05/grit_accountability_noncognitive_skills_duckworth_veager.html)

<sup>50</sup> *Addressing Social Emotional Development and Infant Mental Health in Early Childhood Systems* <http://files.eric.ed.gov/fulltext/ED496853.pdf> (2005)

## Engage the Community in Collectively Defining SEL Standards

The process of collectively defining standards provides a great way to address the first two pitfalls. ***Developing collective standards and engaging all stakeholders in the process of constructing the standard help to ensure that everyone understands and supports the implementation of the learning standards.*** <sup>51</sup>

### CONCLUSION:

The parents of Florida do not send their children to school to lose their 4<sup>th</sup> amendment right to privacy and be psychologically manipulated and experimented upon by federal and state education programs funded by crony capitalists that stand to reap millions if not billions of dollars from our children to change their habits of thinking based on so-called standards that even the experts and proponents admit are subjective and to be tracked into careers based on the needs and desires of business.

**The bottom line is that CBE will be collecting extremely diluted academic and sensitive psychological/socioemotional and family data on children; to do so in a necessarily subjective manner that seems to lack validity; to expose the subject children to possible negative consequences in their later schooling and careers, to entrust that data to agencies that are no longer governed by serious privacy law and that have proven they cannot or will not keep personal student data secure all for corporate profit instead of the benefit of Florida's children. For all of these reasons, we believe this pilot program should not proceed.**