



Comments on the 2nd Draft of the Florida Math and ELA Standards Based on FSCCC Recommendations

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Our most preferred solution continues to be a wholesale replacement of the Common Core/Florida standards in both subjects. Below are specifics.

Math:

1. **Which Standards?** - Standards that could be reviewed and offered include those of high performing states prior to Common Core - California (1997), Indiana (2006), Minnesota (2007), or Massachusetts (2000- 2004) - or countries, such as Singapore and Japan. The Washington Exemplary Math Standards (WEMS), developed by a group of Washington math educators, parents, mathematicians, and science professionals, although not adopted by a state, could be offered as well, since they are a sterling example of high quality standards development after a consensus of the most important stakeholders in math education.
2. **Missing Content/Algebra 1 by 8th Grade** – Ensure that new standards provide a reasonable progression of skill and knowledge attainment to the completion of a full Algebra 1 course by the end of 8th grade at the latest as is done in other high performing countries. One of the reasons other countries are able to accomplish this acceleration is that they focus more exclusively on arithmetic and other skills referred to as “number sense”, including problem solving as well as computation, at the elementary grades and less skipping from one unrelated topic to another. This allows high-performing countries to spend less time reviewing skills because they are not forgotten as easily. This acceleration should be universally available to allow all students that want to pursue a STEM degree, but not universally required for those that do not want this college focus or simply need a little more time to truly master the content. As many experts have pointed out, Algebra I by 8th grade is very important for calculus and for those that want STEM careers, especially poor children that do not have access to tutoring.
3. **Standard Algorithm/“Variety of Strategies”** – The standard algorithm is the most efficient way to solve a problem and most fulfills Governor DeSantis’ executive order to get rid of Common Core, which was significantly based on parental concerns about not being able to help their children with math homework. Although an improvement over Common Core that moves the standard algorithm to third grade instead of fifth grade, moving use of the standard algorithm to second grade would be ideal, as is done in high performing pre-Common Core states like Massachusetts. ***The phrase “variety of strategies” should be replaced by “the standard algorithm” from second grade through the grades*** where arithmetic is taught as in the high-performing pre-Common Core states mentioned above. The basic math operations of addition, subtraction, multiplication and division should be taught as early as is developmentally appropriate using the standard algorithms. Once children fall one or more years behind the optimal progression, it is very, very difficult for them to catch up.

4. **Procedural Fluency vs. Communication** - Math standards should promote the actual performance of math problems in a much higher percentage than understanding, thinking about, or communicating about mathematical concepts, especially in the earlier grades, as is done in high performing nations like Singapore and Japan and in high performing states prior to Common Core, such as Massachusetts and California. The Mathematical Thinking and Reasoning Standards in the second draft need to be removed. An excellent white paper containing great data on this subject is available [here](#).
5. **Individual Standards** - The premises of the Common Core are fundamentally defective. Having the public comment on individual standards implies that the standards need to be tweaked, or adjusted, at specific passages. It will thus likely lead to a repeat of the rebranding that occurred in 2014, and is an implicit rejection of the Governor’s directive to “eliminate Common Core and return to the basics of reading, writing, and arithmetic.” Public comment on individual standards will not fix the systemic sequential flaws of the current math standards nor address needed content that is not present in the standards for either subject. Intentionally or not, constraining comments in this manner limits the ability of parents and other citizens to make broader points about the standards and gives the impression that public input is not really welcome.
6. **Scope and Sequence/Developmental Appropriateness** – Despite not wanting to comment on individual standards as noted above, it is important to note the standards that are still in the second draft from the Common Core that are developmentally inappropriate. It is critical that these be fixed for the third draft. ***The basic math operations of addition, subtraction, multiplication and division should start being taught in second grade using the standard algorithms***, not delayed for up to two years, as is done in Common Core. Once children fall one or more years behind the optimal progression, it is very, very difficult for them to catch up. These comments are based on the standards of other pre-Common Core states and the expert comments of [Ze’ev Wurman](#), former U.S. Department of Education official and current Stanford University Hoover Institute fellow:
- MA.K.NSO.2.1 - Count to 100 by ones and by tens.
Comments: The MN standards go to 31 in kindergarten and 120 in grade 1. Wurman wrote - "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."
 - MA.K.NSO.2.2 - Starting at a given number, count forward within 100 and backwards within 20.
Comments: MN only requires counting within 20. Wurman agreed, "Unwisely aggressive for numbers up to 100. A limit of 20 would be more appropriate."
 - MA.K.GR.2.3 - Combine three-dimensional figures to form a composite figure. Figures are limited to spheres, cubes, cones and cylinders.
Comments: This is a 1st grade standard in MN. Wurman agreed: "Inappropriate. Children at this age can intuit the difference between 2D and 3D but many have a difficult time to verbalize it and/or visualize it."
 - MA.K.NSO.2.4 - Compose and decompose numbers from 11 to 19 with a group of ten ones and additional ones. Demonstrate each composition or decomposition with objects, drawings or equations.
 - MA.K.AR.1.1 - Represent addition and subtraction within 10 in multiple ways using objects, fingers, drawings, verbal explanations and equations.
 - MA.K.AR.1.2 - Solve addition and subtraction word problems within 10 using objects, drawings or equations to represent the problem.

Comments: These are the three kindergarten standards in the second draft mentioning equations and number sentences, which are not mentioned in MN until grade 1 and felt to be inappropriate at this grade by Wurman.

- MA.1.FR.1.1 - Partition circles and rectangles into two and four equal-sized parts. Name the parts using appropriate language including halves or fourths. Describe the inverse relationship between the size of the parts and the number of parts.
Comment – Understanding halves and fourths is not mentioned in the MN standards until grade 4 in general, not having to do with shapes. Wurman believes this is unnecessarily aggressive for grade 1.
- MA.2.M.2.1 - Tell and write time on analog and digital clocks to the nearest five minutes using a.m. and p.m. appropriately. Express portions of an hour using the fractional terms half an hour, half past, quarter of an hour, quarter past and quarter til.
- MA.2.M.2.2 - Solve one- and two-step addition and subtraction word problems involving either dollar bills within \$100 or coins within 100¢ using \$ and ¢ symbols appropriately.
Comment - These both are grade one standards in MN

7. **Social Emotional Learning** - Completely reject “social-emotional learning” or “21st Century” psychosocial skills in the standards, such as “grit/perseverance” or a “growth mindset.” Both the math and the ELA standards are supposed to be and have been portrayed as rigorous academic content standards, and should focus on subject-matter academic content. The research supporting such fuzzy standards is unreliable and some of it borders on fraudulent. This has been a grave concern because there will be a push to assess these very subjective parameters like perseverance and effortful learning, as well as replace the academic aspects of math. The lack of good definition, research basis, dangers to privacy, and other problems are outlined in a [white paper for the Pioneer Institute \(executive summary\)](#) That is one reason why we are pushing for the elimination of many of the Mathematical Thinking and Reasoning Standards in the second draft, especially standards 1-3.

8. Prominently include, especially for review of the high school standards, content experts (e.g., professors of mathematics, engineering, and physics as opposed to professors of mathematics education) in the subject matter standards for final review. Some of the experts reviewing the standards for younger students should have strong abilities in child development to make sure that new standards are developmentally appropriate, a glaring problem with Common Core.

FSCCC Comment – We are extremely pleased that you have consulted Drs. Gray, Stotsky and Bauerlein in this process. We would be very appreciative if you would find experts in phonics for ELA like Dr. Louisa Moats, who had many phonics-based objections to Common Core and child development for both subjects for the review of Draft 3. There are still several standards in both subjects that need to be moved or eliminated that are still identical or close to Common Core that are developmentally inappropriate. See the lists in each subject.

9. There should be no requirement for specific instructional strategies, especially some of the experimental ones used in geometry, with the exception that the ***standard algorithms for the basic arithmetic operations should be mastered by all students starting in the second grade.*** Another reason to throw out those specific Mathematical Thinking and Reasoning Standards and any other specific teaching strategies because some of these requirements even though they are not supposed to be there, are experimental, developmentally inappropriate, vague, and have caused great frustration for students and parents.

1. **Which Standards?** - Standards that could still be offered include those of high performing states prior to Common Core, including Massachusetts, Indiana, California and Texas. Our strong preference is Massachusetts.
2. **Intensive systematic phonics is critical** – There have been over 100,000 studies showing the effectiveness of phonics to teach reading. The [state of Texas](#) is now requiring phonics to be taught in every public school in that state. This instruction begins in kindergarten in the standards of second draft, which is commendable. The work of Dr. Louisa Moats (see [here](#) and [here](#)) is critical in this area, as she was involved in the Common Core review and had objections to the methods used.
3. **There should be strong links between the standards and the literature curriculum** – ELA standards experts like Professor *Emerita* Sandra Stotsky says that without a strong literature curriculum, the standards will be empty skills. Dr. Stotsky's [revised table of contents](#) for literature and ELA put together with FLDOE is an excellent way to keep that from happening. The commissioner's Back to School Reading List put together with the expert help of Dr. Mark Bauerlein, Emory University literature professor, which is used as a the basis for the literature appendix in the second draft contains many great works at all ages and should be formed into a coherent curriculum from grades K-12. The only shortcoming in the literature list we see is that listing for the U.S. Constitution in the literature appendix only requires the preamble. It should include the entire document and the Bill of Rights.
4. **The literature curriculum should be explicitly be tied to civic literacy** – The following statements come from Dr. Sandra Stotsky's [version of the 2001](#) of Massachusetts standards which she has made available to any state for use free of charge. These principles fit very well with Governor Ron DeSantis' efforts to get rid of Common Core and to emphasize civic literacy:

It is based on two premises: that learning in the English language arts should be cumulative and that the reading of increasingly challenging literary and non-literary works as well as the writing of increasingly extensive research papers are the basis for developing the independent thinking needed for self- government. (Purpose statement)

"While encouraging respect for differences in home backgrounds, an effective English language arts curriculum nurtures students' sense of their common ground as present or future American citizens in order to prepare them for responsible participation in our schools and in civic life." (Guiding Principle 10)

"Thus, the curriculum should emphasize literature reflecting the literary and civic heritage of the English-speaking world." (Found in Guiding Principle 3)

5. **Developmentally inappropriate standards in Draft 2 still present from Common Core** – While not wanting to comment on individual standards, the following standards are still present in Draft 2 that were both present in Common Core and deemed developmentally inappropriate by numerous ELA experts and are provided with comments:

- **2nd Draft** - ELA.1.V.1.2: Identify and use frequently occurring base words and their common inflections in grade-level content.

CCSS.ELA-Literacy.L.K.4b (Very similar to LAFS.K.L.3.4) 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 pointed out in her [Florida comments](#) 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. It is good that this has been moved to 1st grade, but students may need long to master this standard.

- **2nd Draft - ELA.K12.EE.5.1** - Use appropriate collaborative techniques when engaging in discussions in a variety of situations, including one-on-one dialogues and larger conversations.

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 – Although the 2nd draft has these skills for K-12 and uses the word “appropriate,” this skill is still not appropriate for kindergartners. Here is FSCCC’s comment from 2012: “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.”

- **2nd Draft - ELA.4.C.1.3** - Write an opinion or make a claim supporting a point of view with logical reasons and details and provide a conclusion.

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

Comment - This is one example of point of view standards that are very subjective and difficult to fulfill in the younger grades.

- **2nd Draft - ELA.1.C.1.3** - Write an opinion about a topic or text with at least one supporting reason and a sense of closure.

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 - Providing a sense of closure is another subjective effort requiring opinions from both student and teacher. The CCSS standard was admitted by Pamela 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).” This is far too subjective for early elementary students, especially when Common Core was always portrayed as rigorous academic standards, not social emotional standards.

- **2nd Draft - ELA.3.R.1.5** - Describe how illustrations contribute to the meaning of texts in a variety of written formats.

CCSS 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)

- **Second Draft - ELA.5.R.1.6** - Compare and contrast literary texts from a variety of cultural perspectives.

CCSS 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...difficult to meet...because it asks them to carry out two different operations on two or more texts that almost certainly differ in content, style, and organization." (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 developmental concerns regarding several Common Core English standards.)

- **2nd Draft - ELA.K.C.2.1** - Present information orally using complete sentences.

CCSS 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." (Yatvin)

- 6. Social Emotional Learning (SEL)** – As discussed above in the math section, there is much SEL inserted into both the Common Core math and ELA standards as inserted and directed by [national stakeholders](#), despite the fact Common Core was guaranteed to be rigorous and academic. These must be completely rejected.