



April 2, 2010

Evidence of
late feedback
round (April, 2010)

Chris Minnich
Council of Chief State School Officers
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Dear Chris:

Thank you for the opportunity to comment on the public draft of the Common Core State Standards for English Language Arts and Mathematics that were released on March 10. Attached are the Wisconsin Department of Public Instruction's comments regarding the most recent draft.

Overall, we continue to congratulate and applaud the progress made between the various drafts on this very important work for both Wisconsin and the nation. The comments provided represent the response from experts within our agency as well as comments heard from our stakeholders.

Again, thank you for the ongoing opportunities that you provided to the states throughout the development process. As the drafts evolved from one to the next, it was clear the comments provided by the states were listened to and addressed.

Sincerely,

Tony Evers, PhD
State Superintendent

TE:sg

1 of 7

**Common Core State Standards
Wisconsin Feedback (April 2, 2010)**

1. The documents still contain too many standards. This becomes especially problematic when considering the impact on assessment.
2. The documents **must** have a common architecture, creating parallel language, structure, and organization for English language arts (ELA) and mathematics. Both ELA and mathematics will be used by K-5 teachers. In other words, at least half of the teachers using the standards will be using both ELA and mathematics. Consequently, the standards must have the same architecture. As this architecture is designed, the emerging Common Core efforts in science and social studies must be considered. Again, if this common architecture is not addressed, it will result in elementary teachers and perhaps others wading through different content area structures (e.g., ELA, math, science, social studies). When an individual state develops standards, care is to taken to create the same structure because it is the foundation for discussion across the content areas. Part of the "Common Core" should be common language, common structure, common organization.

To achieve this, consider the following:

- a. Use the same definitions of the various "layers" of each discipline's standards (mathematics uses domain and clusters; ELA uses strands).
- b. The grade level narratives that are given in mathematics are useful to provide an overview to the grade level, but for English language arts, the grade-to-grade differences are minimal, so a narrative overview should be given to each grade

2 of 7

band (K-2, 3-5, 6-8, 9-12). The grade level narratives for mathematics at the high school are currently more like a list of topics than a description of learning about the topic.

3. Including literacy only in history/social studies & science suggests that ELA teachers need to include this content in their classes. We encourage instead a broader emphasis on literacy across all subject areas (arts, world languages, career and technical education, health/physical education, mathematics). We recommend placing these standards either as an appendix to the ELA document or saving them for future development of common core standards for social studies and science. If these standards are still to be included in the ELA Common Core, we recommend:
 - a. Identify who is responsible for these standards
 - b. Show how these standards are connected to ELA instruction as well as instruction in social studies and science classes
 - c. Regardless of whether or not these standards are included in this document, include more elaboration to explain their connection with ELA and answer the question about how these standards would be assessed in ELA and the other subjects.
4. The Common Core Standards need an overarching vision up front that points to applications of knowledge and understanding in order to avoid reading the standards as a skills checklist (necessary to move from current standards to new standards; from current curriculum to new curriculum at LEA-level)
5. A clearer integration of technology applications needs to be embedded in the ELA and mathematics standards. If not explicitly included, this is easily ignored.

6. English Language Arts specific:

- a. The content of the discipline is more than the communication skills learned.
Therefore, the elements detailed in the standards are necessary, but not sufficient in defining the discipline. Communication processes are an important inclusion, but learning about the human experience across time through ELA is left out.
- b. The writing exemplars showcase informational and explanatory writing, but should also include persuasive and creative writing exemplars.
- c. The “Exemplars of Reading Text Complexity and Quality” (Appendix B) becomes a recommended (if not required) list with the addition in the description of “and quality.” In “Appendix B: Illustrative Texts,” we recommend fewer exemplars (perhaps 2-3 per grade, in a variety of genres) and the inclusion of an explanation as to why each was chosen, highlighting the text complexity demonstrated in each. These changes would provide the technical assistance that would help teachers in choosing materials of comparable complexity. Such an approach would mirror what was done in “Appendix C: Samples of Student Writing,” as well as the approach in “Appendix A: The Model in Action: Sample Annotated Reading Texts” (pp. 15-25). It has been noted that there are passages drawn from materials that are listed in the “Appendix B: Illustrative Texts” that have been used or are being considered for future use on NAEP assessments. The use of these passages on NAEP sets the stage for the unintended interpretation of this list as a focus for instruction, leading to limitations on teachers’ instructional decisions.

- d. The Reading Foundations, unlike other strands, is singled out. This section is described both as standards and as foundational skills. These two terms are not the same and the role of this section must be determined: If the section is standards, the content belongs integrated into the ELA document; if the section is foundational skills, the section belongs in an appendix.

7. Mathematics specific:

- a. With the “Standards for Mathematical Practices” (pp. 4-5) relegated to front matter (and not embedded in the actual K-12 standards), the K-12 standards become too much a skills checklist. We recommend clustering the standards into deeper understandings, to connect topics within a grade level and also to show the connections of concepts K-12, such as making more explicit how the K-5 concepts lead to algebraic thinking. Leaving the grade level standards as they are now, the long list could be interpreted as a checklist of isolated skills rather than as concepts to teach for understanding. Clustering will also diminish redundancies such as found in grade 2, Number – Base 10 (#7 & #9 both refer to mental computation and could be combined.)
- b. The language of the standards must strike a balance between a *mathematician’s* language and a *mathematics educator’s* language in both the Standards for Mathematical Practice and the Grade Level Standards. It is important that the final version uses terms that are mathematically accurate, but not unnecessarily technical, especially critical for teachers of grades K-8.

5 of 7

- c. As noted earlier, the narrative at the beginning of each grade level is a benefit and needs to reflect the skills, understandings, and mathematical proficiencies to truly ‘tell the story’ of mathematical learning at that level. There needs to be a coherent message that builds across levels. In the public draft version, the high school narratives seem to be more of a list of skills. It would be helpful if the writers would review the narratives side-by-side to ensure the coherence.
- d. The elementary and middle school overview on pages 7 and 8 is very helpful to see how the standards build across grade levels K-5 and 6-8; however, a clear connection is missing to help bridge elementary to middle school. The link of the six domains in grades K-5 to the six domains in grades 6-8 must be explicit (currently only “Geometry” appears in both domain groupings). The recommendation is to identify the specific connections linking elementary grades to middle school and middle school to senior high school. Broad categories that provide K-12 coherence would be helpful, for example
- Number and Algebra
 - Geometry
 - Measurement, Data/Statistics, and Probability
- e. The current learning progression, especially at the elementary level, designates mastery of some skills prior to developmental readiness. This has the potential consequence of focusing instruction on memorizing procedures and skills rather than building an important foundation of understanding. This is especially apparent in the areas of base-ten number, development of relational thinking about all numbers, including fractions, and decimal concepts.

- f. The focus on ‘the standard algorithm’ continues to be problematic. This narrow definition will likely be interpreted in a very limited way by educators and will not provide access to all students. It is debated what ‘the standard algorithm’ actually means in the international world of mathematics. We suggest that the language be broadened to include multiple algorithms and efficient computational strategies.
- g. Application of mathematical knowledge is very important and seems to be missing from the current draft. Application of mathematics needs to be readily apparent through rich examples in all areas. Most of the standards seem to point to modeling; however, more applications through modeling need to be included. Modeling as a separate standard with no applications is insufficient for this important component of mathematics.
- h. The course pathways section (Appendix A) does not belong in a standards document. These are curriculum and program decisions, not elements of standards. The course pathways are too skills-based and are not neutral, especially when it comes to assessment. The course pathways support end-of-course assessment or the general ACT-type of assessment, whereas the international benchmark (comparison with nations ranking high on international assessment measures) is for integrated maths (in the plural).