

Rebuttal Paper to the WDE timeline distributed in August 2013

WDE Timeline Entry Dated 2009

Memorandum of Agreement signed by Gov. Freudenthal and Sup. McBride

WDE asserts – “The MOA **allows** the state to participate in a state-led process to draw on evidence to lead to a set of common core state standards (CCSS) in language arts and mathematics for students in grades K-12.” (<http://edu.wyoming.gov/sf-docs/standards/ccss-in-wyoming-081213.pdf>)

MOA actually says – “This document **commits** states to a state-led process that will draw on evidence and lead to development and **adoption of** a common core of state standards (common core) in English language arts and mathematics for K-12.” Source: http://wyomingcitizensopposingcommoncore.com/wp-content/uploads/2013/07/CommonCoreStateStandardsInitiativeMOA_Wyoming.pdf

Issue: Why does WDE use the word *allow* when the MOA uses the word *commits*? Why does WDE leave out the words “adoption of”? Also, “commits” means to bind (a person or an organization) to a certain course or policy. “Allows” means to permit or give permission. This MOA by its language, binds Wyoming into the adoption of the CCSS.

Significance: The MOA is a binding agreement and binds Wyoming to the terms it contains.

WDE Timeline Entry Labeled “Key Points from MOA Document” (Selected Bullet Points)

Second Bullet Point:

WDE asserts: Individual states decide how to align the statewide assessment (PAWS in WY) to the CCSS

MOA truth: The second phase of the CCSSI will be development of common assessments aligned to the core standards

Issue: Just as states need to modify or create new curriculum frameworks and instructional materials to match the CCSS, states will also need to significantly alter their assessments to ensure alignment with the CCSS. The assessment that Wyoming has begun to participate in is called Smarter Balanced Assessment Consortium, or SBAC. Participation in SBAC requires each state to identify existing barriers in state laws,

statutes, regulations or policies and remove those barriers prior to implementing this federally funded assessment.

Significance: The assessments that are common further undermine local control because the MOA binds the state to participation in a common assessment. Furthermore, by signing a binding agreement to participate in Smarter Balanced Assessment, Wyoming will have to change state laws and regulations.

Fourth Bullet Point:

WDE asserts: Individual states chose how to adopt the CCSS- there were three options:
1) Adopt the common core in its entirety, as it was written and published on corestandards.org
2) Align at least 85% of a state's "home grown" standards to the CCSS; or,
3) Adopt the CCSS in its entirety with the option to "include additional state standards beyond the the common core standards.

MOA truth: The MOA outlines how the states will voluntarily adopt the common core

Issue: States may choose to include additional state standards beyond the common core standards. States that choose to align their standards to the common core standards agree to ensure that the common core represents at least 85% of the state's standards in ELA and math.

Significance: States could adopt the common core in its entirety, or they could choose to add 15%. Aligning 85% of a state's "homegrown" standards was not an option- but rather, the state had to ensure that the common core represented at least 85% of the state's standards.

Also in Fourth Bullet Point:

WDE asserts: In Wyoming, content review committees for math & ELA chose to adopt the CCSS in its entirety without adding additional standards. The content review committee included K-12 and higher education, as well as parents.

The whole truth: The CCSS review committee: Math had 38 participants; 2 parents, 3 UW faculty-only one is a Professor of Mathematics. ELA had 32 participants; 3 parents, 3 UW faculty-only one is a Professor of English.

Issue: The WDE timeline does not clarify the subject matter that these committee members teach, which is important in qualifying them to participate on the review committee.

Significance: If the CCSSI is to prepare for "college and career readiness" then it would be best to have college professors of Mathematics and ELA reviewing/approving the

standards. While input from K-12, and parents is also important- the Mathematics & ELA professors would know best where students are lacking when they get to college level coursework. Furthermore, there are many comments regarding these standards from those who participated in the committee- yet their comments did not change the outcome.

Source, http://edu.wyoming.gov/sf-docs/publications/Jun10_Packet_Part_1.pdf?sfvrsn=0

In addition, there was a National Validation Committee which is discussed in the CCSSI MOA, and it was charged with the task of providing an independent review of the common core. Dr. Sandra Stotsky (ELA) and Dr. James P. Milgram (Mathematics) refused to sign off on the standards.

Fifth Bullet Point:

WDE asserts: The MOA describes ways the USDE can support states that choose to adopt the CCSS. However, no state was required to adopt the CCSS.

MOA “rest of the story”: “Federal Role” section clearly outlines how the government can provide key financial support for this effort in developing a common core of state standards and in moving toward common assessments, such as through Race to the Top Fund authorized in the American Recovery and Reinvestment Act of 2009. Further, the federal government *can incentivize this effort through a range of tiered incentives*, such as providing states with greater flexibility in the use of existing federal funds, etc.

Issue: Wyoming did apply for Race to the Top, phase I with the intent to receive federal dollars. By applying in January 2010, the state agreed to adopt the common core state standards before they were published in June 2010. Furthermore, Wyoming did receive ARRA funds in 2009 in exchange for a commitment to enhance the quality of education standards. Because of this, Wyoming had to establish enhanced quality of standards, and then comes the “college and career readiness standards” to assist them...

Source: <http://www2.ed.gov/programs/statestabilization/stateapps/wy.pdf>

Furthermore, Wyoming also took a No Child Left Behind Waiver in exchange for a commitment to adopt college-and career-ready standards tied to state tests.

Source: <http://edu.wyoming.gov/sf-docs/flexibility-waiver/wyoming-esea-flexibility---04-15-13-with-attachments.pdf>

Significance: We were not required to adopt the CCSS, but the WDE avoids mentioning the many losses and penalties we were sure to experience if we did not.

WDE Timeline Entry Dated September 25, 2009

First Public Draft of CCSS Released

WDE asserts: Wyoming Department of Education informs districts through a Superintendent's memo that the NGA and CCSSO have released the first official public draft of the college and career readiness standards in language arts and math.

MOA side note: CCSSO and the NGA Center will ask states to share their adoption timeline and process in early 2010, when the *K-12 common core* state standards are completed.

Issue: The draft referenced here is NOT a draft of the *K-12 common core* state standards, but rather the *college and career readiness standards*. These documents are different. The WDE does not clarify the difference between these two draft documents.

Significance: This is important later, when Wyoming applies for Race to the Top grant money, without having seen a draft of the K-12 common core state standards.

Important Dates *Omitted* from the WDE Timeline Between September 25, 2009 and June 2, 2010

January 4, 2010: The WDE requested districts to each sign an MOU with the state for the RttT application; the memo gave the districts only *4 days* to return the MOU signed by the district Superintendent, Board Chair President and the Local Teachers' Union Leader; funding rewards were attached to district participation. The MOU outlined Wyoming's plan to support the statewide transition to and implementations of internationally benchmarked K-12 standards that build toward college and career readiness.

January 14, 2010: WY State Superintendent told the SBE in a meeting that the state had an excellent chance of receiving \$162 million from the RttT and \$11 million more through a data grant. Source: http://edu.wyoming.gov/sf-docs/publications/Jan10_SBE_Minutes

January 19, 2010: The 1st phase of the Race to the Top grant applications were due; Wyoming submitted an application. Application calls for agreement to a common set of standards:

Common set of K-12 standards means a set of content standards that define what students must know and be able to do and that are substantially identical across all States in a consortium. A State may supplement the common standards with additional standards, provided that the additional standards do not exceed 15 percent of the State's total standards for that content area.

The ONLY set of standards that met this criteria were the Common Core- which were still under construction.

February 22, 2010: The federal government announced the intent to tie Title I funding to the Common Core commitment, essentially cutting off nearly all federal education funding to states that opt out.

March 2010: The first draft of K-12 standards was finally released by NGA and CCSSO, AFTER our state had already committed to the process of adoption.

Late March 2010: Wyoming is notified it does not win the Race to the Top grant in Phase I

April 16, 2010: In an SBE board meeting, according to the meeting minutes, the State Superintendent stressed that Wyoming would “need to figure out how we can work with common core standards by 2015; otherwise, it could affect the federal dollars we receive”

Source: http://edu.wyoming.gov/sf-docs/publications/Apr10_SBE_Minutes.pdf?sfvrsn=0

May 14-15, 2010: A group of 37 teachers, parents, business people, higher education faculty and WDE personnel met in Casper to look at the pros and cons of the common core Math standards (CCSS)

May 21-22, 2010: The Wyoming Department of Education Standards Team , in an effort to involve key education stakeholders in the 2010-2013 standards review process, organized a two day meeting on May 21-22, 2010 in which twenty-nine area content experts convened to conduct a detailed analysis of the English Language Arts Common Core State Standards for consideration by the State Board of Education.

Source:

http://edu.wyoming.gov/PublicRelationsArchive/supt_memos/2010/2010_124.pdf

*the above 2 committees were omitted from WDE timeline. These committees made a recommendation to the State Board of Education to adopt the CCSS in June 2010

June 2, 2010: The official Common Core State Standards were released; copyrighted by the NGA and CCSSO

Issue and Significance of these important dates not being included in the WDE timeline: These events all demonstrate the **INTENT of Wyoming education authorities to obtain federal dollars** in exchange for a commitment to adopt common core. RtTT grant application submitted January 2010. While it is true that Wyoming did not win this grant;

they still applied, and did so *before* they saw a draft of the K-12 common core state standards (March 2010) and before the common core standards were published (June 2010). They applied before educator comment was obtained through the survey sent out on March 26, 2010 and closed on April 30, 2010. The adoption was clearly much more about a race for potential federal money than about considering the true educational quality of the standards.

WDE Timeline Entry Dated June 16, 2010

State Board of Education meeting

WDE asserts: The Wyoming State Board of Education gives approval for *consideration* of the Common Core State Standards in its next standards review process. *This vote did not solidify an adoption of the CCSS in Wyoming*; instead, it gave the Wyoming content review committees an avenue to consider the CCSS as *an option* during the standards revision process.” (<http://edu.wyoming.gov/sf-docs/standards/ccss-in-wyoming-081213.pdf>)

Documentation otherwise: “State Board of Education minutes dated June 16, 2010” Dana Mann-Tavegia moved the Board *approve the adoption of the common core state standards* in English Language Arts and Mathematics in the next revision of the Wyoming Content Performance Standards to be completed by December, 2011. The Common Core State Standards will comprise at least 85% of the revised Wyoming Content Performance Standards in each of these two content areas, seconded by Mike Hejtmanek, motion carried.” (http://edu.wyoming.gov/sf-docs/publications/Jun10_SBE_Minutes_1.pdf?sfvrsn=0.)

Further, in a memo from WDE to superintendents dated July 2, 2010 it is stated: On June 16, 2010, at its meeting in Riverton, the Wyoming State Board of Education voted to adopt the Common Core State Standards to be included in the next revision of the Wyoming Content and Performance Standards in English Language Arts and Mathematics.

Source:

http://edu.wyoming.gov/PublicRelationsArchive/supt_memos/2010/2010_124.pdf

WDE also put out a press release stating: “**Cheyenne** – Wyoming State Board of Education Chairman Sandra Barton has announced that Wyoming has adopted the Math and Language Arts Common Core Standards.”

Source:

http://edu.wyoming.gov/PublicRelationsARchive/press_releases/2010_pr/commo_n_core.pdf

Issue: Was the vote merely to “consider”, to “not solidly” adopt, and to have as “an option” as WDE claims or was the vote as the WY State Board Of Education minutes, memos & press release state, to “approve the adoption of the common core state standards?”

Significance: If the State Board of Education voted to approve the adoption of the Common Core State Standards in June 2010, then the revision committees and public comment that occurred after June 2010 was just a formality since the Board had already adopted Common Core.

Specifics Omitted from from WDE Timeline

March 5-6, 2011

The Language Arts Standards Revision Committee has scheduled a meeting to draft introductory material and performance level descriptors for the Wyoming Content and Performance Standards in Language Arts. Superintendent memo 2011-029 states: “**The Wyoming State Board of Education voted to adopt the Common Core State Standards (CCSS) to be included in the revision of the Wyoming Content and Performance Standards in Language Arts. As indicated in the motion, the CCSS will be included, in their entirety, in the Wyoming Content and Performance Standards**”

Source: http://edu.wyoming.gov/sf-docs/suptmemos/2011_029_Supts_Memo_Language_Arts_Content_Comiteee_Meeting.pdf?sfvrsn=0

Issue: This committee is meeting in order to establish introductory material and performance level descriptors, not to advise on whether to adopt the CCSS.

Significance: This committee operated under the assumption that the CCSS had already been adopted in June 2010.

Here is the list of the participants: http://edu.wyoming.gov/sf-docs/publications/Standards_Review_Steering_Committee.pdf

May 9, 2011- June 15, 2011:

WDE puts out another memo for public comment period. However, this memo states: “**Please note: the Wyoming Content Standards for mathematics and language arts have incorporated the Common Core State Standards, which the State Board of Education has agreed to adopt. For this reason, these standards and benchmarks cannot be changed.**”

Issue: The point of public comment is to obtain input from stakeholders.

Significance: Input from stakeholders at this point cannot change the standards, as the state board of education has already agreed to adopt the CCSS.

Source: http://edu.wyoming.gov/sf-docs/may-sups-memos/2011_058_Supts_Memo_WY_Content_and_Performance_Standards_Revisions.pdf?sfvrsn=0

WDE Timeline Dated September 23, 2011

Revised Standards Presented to State Board of Education

WDE asserts: The Wyoming standards review committee presents the revised standards for math and language arts (CCSS), as well as health, to the State Board of Education. The Board approves the revised Wyoming content standards in language arts, math and health.

Important Documentation from Meeting: State Board Packet September 2011, page 79: “In May 2010, after careful consideration, and with support from members of the English Language Arts review committee, the Wyoming State Board of Education adopted the common core state standards for Mathematics and English Language Arts and literacy in History/Social Studies, Science and Technical Subjects. This standards document is a result of that action.”

Source: http://edu.wyoming.gov/sf-docs/state-board-documentation/September_2011_Packet.pdf?sfvrsn=0

Issue: The WDE claims that on June 16, 2010, the Wyoming State Board of Education only gives approval for consideration of the Common Core State Standards.

Significance: As much as the WDE would like to have the public believe otherwise, documents keep affirming that the standards were indeed adopted by the State Board, before a final version was available to examine, and outside of the proper process for standards adoption in Wyoming.

WDE Timeline Entry December 12, 2011

Public Comment Begins

WDE asserts: The Wyoming Department of Education begins accepting public comment on the content standards in math and language arts (which are now the Common Core State Standards). As part of the rules promulgation process, the general public is invited to comment on the revised standards. Announcements were posted on our website and distributed via memo to every school district, as well as through press release.

Issue: The memo to superintendents does not direct them to distribute this information to teachers or to parents. The memo can be found here:

<http://edu.wyoming.gov/sf-docs/dec-memos/Memo No 2011 166 Public Hearings Chapter 31 Rules.pdf?sfvrsn=0>

Significance: The State Board of Education had already approved the adoption of the Common Core State Standards in May 2010. Public comment in December 2011-January 2012 would have no effect on the standards. Furthermore, the memo does not direct superintendents to share this information with teachers or parents. In addition, districts/schools do not advise parents to frequently check the WDE website & therefore the public is largely unaware of changes being made at the state level.

WDE Timeline Entries Dated January 25, 2012-February 14, 2012 Public Comment Period Closes, Public Hearings Held

WDE asserts: Announcements that the public was invited to comment also included a press release alerting citizens about multiple public hearings across the state on the CCSS. There is no evidence to support that the press release put out by the WDE was actually published by any Wyoming newspapers. The press release can be found here: <http://edu.wyoming.gov/sf-docs/wde-press-releases/PRESS RELEASE Ch31 Rules Public Hearings.pdf?sfvrsn=0>

Issue: The message simply did not make it to the majority of the public. The WDE fails to reveal how many members of the public attended these meetings, if any. And again, the State Board of Education has already voted to adopt the CCSS in May 2010.

Significance: How can public input at this point be anything more than a formality?

WDE Timeline Entry Dated March 20, 2012 Suggestions and Written Feedback Received by State Board

The State Board of education meets via teleconference. One purpose of this meeting was to provide and update on Wyoming State Content Standards Rules & Regulations. Julie Magee hoped to have all the responses by March 15, 2012. Public comments were also received and can be found on page 57 of the following source:

http://edu.wyoming.gov/sf-docs/state-board-documentation/March_20_2012_Meeting_Packet.pdf

Issue and Significance: Note the “canned responses” planned for negative public comments in the summary preceding the comments. This seems to indicate a predetermined outcome to the process. State Board members are helpfully reminded at the bottom of the summary that basically the whole process will have to start over in our

state if the CCSS are not adopted. It is also interesting to note how many of the negative responses had to do with the “confusion” the public apparently has about the Common Core being a “federal initiative”. Yet the standards being copyrighted, allowing no further input from states, and the federal tendency to “support” this initiative with grants and flexibility, and also to impose penalties for not complying, makes very real the concerns expressed about the federal element and loss of local control.

Summary:

The WDE timeline that was put out in August 2013 does not include many key facts and dates. These facts can be supported by meeting minutes, memos, MOAs & other documents. The adoption of the CCSS in the state of Wyoming should have been a transparent process that included the public. The fact of the matter remains that the CCSS are copyrighted by the National Governor’s Association & the Council of Chief State School Officers, and therefore, are unamendable by the state of Wyoming. Wyoming Citizens Opposing Common Core encourage the public to research this information and discuss it with teachers, principals, school boards, and legislators. The education of our children is too important not to.